

South Norfolk Council

**Site Specific Allocations and Policies Document,
Wymondham Area Action Plan and Development
Management Policies Document**

**Environmental Adoption Statement (prepared under
Regulation 16 of the Environmental Assessment of
Plans and Programme Regulations 2004)**

October 2015



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Introduction

South Norfolk Council adopted three Local Plan Documents on Monday 26 October 2015, namely the Site Specific Allocations and Policies Document (SSAPD), the Wymondham Area Action Plan (WAAP) and the Development Management Policies Document (DMPD). In accordance with Regulation 16 of the Environmental Assessment Plans and Programmes Regulations 2004, the Council has prepared this adoption statement (to cover all three documents) that sets out:

- a) How environmental (and sustainability) considerations have been integrated into the plans;
- b) How the environmental reports (Sustainability Appraisals) have been taken into account;
- c) How opinions expressed in response to:
 - i. The invitation referred to in regulation 13(2)(d);
 - ii. Action taken by the responsible authority in accordance with regulation 13(4) have been taken into account;
- d) How the results of any consultations entered into under regulation 14(4) have been taken into account;
- e) The reasons for choosing the plans as adopted, in the light of other reasonable alternatives; and
- f) The measures that are to be taken to monitor the significant effects of implementation of the plans

This statement is a summary of information contained within the Sustainability Appraisal (SA) documents and other relevant documents produced during the preparation of the three Local Plans. The documents referenced and quoted can be viewed in full on the Council's website at www.south-norfolk.gov.uk. Particular links to key documents are given throughout the statement.

This statement has been prepared with input from AECOM Infrastructure & Environment UK Limited, who undertook SA Addendum work on behalf of the Council following the original examination hearing sessions.

a) **How environmental (and sustainability) considerations have been integrated into the plans**

Environmental considerations have been integrated into the plan through the SA process which took place for all three Local Plan documents. SA was an integral part in the preparation of the three Local Plan documents, as this section demonstrates.

Under the Planning and Compulsory Purchase Act (2004), the Council is required to produce a SA for each Local Plan document it prepares. The overall purpose of the SA process is to promote sustainable development through the consideration of social, environmental and economic concerns in the preparation of a Local Plan document and to evaluate reasonable alternatives. SA also incorporates the requirements for a Strategic Environmental Assessment required by European Directive 2001/42/EC (the SEA Directive).

The SA process actually began before the preparation of the three Local Plan documents. The overall effects of the pattern of growth in South Norfolk was assessed as part of the SA of the (now-adopted) Joint Core Strategy (September 2009) and sustainability concerns were taken into account during this process.

SA Scoping Report (covering all documents)

The SA Scoping Report was published in 2010. It covers all the South Norfolk Local Plan Documents together (SSAPD, WAAP and DMPD) and provides the baseline for the consideration of environmental concerns. It includes a review of all relevant plans, programmes and policies highlighting a number of key sustainability issues and opportunities which could affect development within South Norfolk, provides a baseline for key environmental, social and economic data and identifies issues and problems which need to be addressed through the South Norfolk Local Plan documents. A copy of the SA Scoping Report can be viewed online at (http://www.south-norfolk.gov.uk/planning/media/B105_B110_General_Direct_Documents_part_10.zip)

The Scoping Report also provided a SA framework and set of objectives for the assessment of all sites and policies in the Local Plan documents. The framework included 9 key environmental objectives, alongside 8 social and 5 economic objectives.

The SA Scoping Report was consulted on widely with both statutory consultees and a number of other organisations. The consultation provided useful feedback on the key environmental, economic and social factors which have helped to shape the development of the South Norfolk Local Plan documents. Consultation comments were considered carefully and as result some minor amendments were made to the SA framework and objectives.

Following consultation on the SA Scoping Report, the SSAPD and WAAP followed a similar process for the early stages of plan production with the DMPD following slightly behind as shown in the table below:

Table showing the process of preparation of the three Local Plan documents and how Sustainability Appraisal has been incorporated at each stage

Date	SSAPD	WAAP	DMPD
2010	Issues and Options consultation including consultation on Site Assessment Criteria (SA Scoping Report)		-
2011	Issues and Options consultation		-
2012	Preferred Options consultation (Interim SA Report)	'Shaping the future of your town' consultation	Issues and Options consultation
2013	Amendments to Preferred Options consultation (SA updated to reflect changes)	Preferred Options consultation (Interim SA Report)	Preferred Options consultation (Interim SA Report)
	Publication of proposed submission plans and SA reports (Reg 19)		
2014	Submission of plans and examination (including Hearings)		
2015	Further alternatives appraisal of the "floating 1,800" dwellings, publication of proposed modifications and plan finalisation (Inspector's Report)		

There follows a brief description of the main stages of preparation for each document to demonstrate how environmental considerations and SA was integrated into plan preparation at each stage in the process:

Site Specific Allocations and Policies document

Issues and Options (2010):

Approximately 1500 sites suggested for development were consulted on in 2010 alongside the SA Scoping Report and draft site appraisal criteria. No appraisal of sites was undertaken at this stage and hence no SA document was published as part of the consultation, although there was also consultation on a site assessment checklist (which would later form the basis of the site assessment process).

Issues and Options (2011):

A further 147 potential sites were suggested through the 2010 consultation so a second Issues and Options stage consultation took place in 2011. Again no appraisal of sites was undertaken at this stage so no SA document was published as part of the consultation. A further 74 sites were suggested across the district through this consultation.

Preferred Options (2012):

An Interim SA (http://www.south-norfolk.gov.uk/planning/media/B115_B117_Site_Specific_Documents.zip) was published at the preferred options stage. This Interim SA tested the Strategic Principles of the SSAPD against the SA Framework and assessed each of the sites put forward at earlier stages against a detailed site assessment checklist, which had been developed from the site assessment checklist consulted on in 2010. As a result of the detailed sustainability exercise the Council was able to identify preferred sites (and reasonable alternatives, where appropriate) for housing, employment and other uses across the district which were subject to public consultation.

Amendments to Preferred Options (2013):

Following the 2012 consultation it was considered that a small number of amendments needed to be made to the preferred approach, generally where either the landowner had withdrawn the site, or where a constraint had been highlighted that the Council believed could not be overcome. These amendments to preferred options were subject to public consultation in 2013 and the Sustainability Appraisal and Site Assessment tables were updated and amended accordingly.

Pre-Submission (2013):

The pre-submission version of the document was accompanied by an updated SA (http://www.south-norfolk.gov.uk/planning/media/C22-C24_Submission_Documents_Site_Specific_Allocations_and_Policies_Documents.zip) and both documents (alongside various others) were then submitted to the Secretary of State for independent examination in April 2014.

Wymondham Area Action Plan

Issues and Options (2010):

62 potential sites were consulted on in 2010 alongside the SA Scoping Report and draft site appraisal criteria. No appraisal of sites was undertaken at this stage and hence no SA document was published as part of the consultation, although there was also consultation on a site assessment checklist (which would later form the basis of the site assessment process).

Issues and Options (2011):

A further 12 potential sites were suggested through the 2010 consultation so a second Issues and Options stage consultation took place in 2011. Again no appraisal of sites was undertaken at this stage so no SA document was published as part of the consultation. A further 5 sites were suggested across the WAAP area through this consultation.

Wymondham 2026 - Shaping the Future of your town (2012):

The Council first consulted specifically on the WAAP in 2012. A leaflet and survey called 'Wymondham 2026 – Shaping the Future Development of your town' were prepared with input from Wymondham Town Council and sent to all homes and businesses in the parish of Wymondham, as well as a large number of other consultees. This consultation was high level and was not accompanied by a Sustainability Appraisal. However the Council did ask questions about broad locations for housing and employment growth at this stage, which helped to develop the options subsequently assessed in the SA Report.

Preferred Options (2013):

An Interim SA (http://www.south-norfolk.gov.uk/planning/media/B141_B145_Wymondham_Area_Action_Plan.zip) was published at the preferred options stage. This Interim SA tested the Strategic Principles of the WAAP against the SA Framework and assessed each of sites put forward at earlier stages against a detailed site assessment checklist, which had been developed from the site assessment checklist consulted on in 2010. The WAAP Interim SA also looked at broad options for housing and employment growth. As a result of the detailed sustainability exercise the Council was able to identify preferred sites (and reasonable alternatives where appropriate) for housing, employment and other uses in Wymondham which were subject to public consultation.

Pre-Submission (2013):

The pre-submission version of the document was accompanied by an updated SA ([http://www.south-norfolk.gov.uk/planning/media/C41_C43_Submission_Documents_Wymondham_Area Action Plan.zip](http://www.south-norfolk.gov.uk/planning/media/C41_C43_Submission_Documents_Wymondham_Area_Action_Plan.zip)) and both were then submitted to the Secretary of State for independent examination in April 2014.

Development Management Policies Document

Issues and Options (2012):

Early consultation focused on what the policies in the document should seek to achieve and the consultation document explored 40 questions about the key issues and options to be considered in preparing the policies. There was no SA report published at this stage in the process.

Preferred Options (2013):

An Interim SA (http://www.south-norfolk.gov.uk/planning/media/B171_B173_Development_Management_Documents.zip) was published at preferred options stage. The Interim SA focuses on the steps taken to develop and test alternative policy options and the decisions made about the alternatives selected as the Council's 'preferred options' for public consultation.

Pre-Submission (2013):

The pre-submission version of the document was accompanied by an updated SA (http://www.south-norfolk.gov.uk/planning/media/C62_C65_Submission_Documents_Development_Management_Policies_Documents.zip) and both were then submitted to the Secretary of State for independent examination in April 2014.

Habitats Regulations Assessment

To comply with European legislation, a Habitats Regulation Assessment (HRA) under the Habitats Directive (1994) is mandatory for all relevant development plan documents. This is to ensure that policies and proposals will avoid adverse effects on certain habitats of national and international significance, whether these are already protected by a formal designation or are sites proposed for such protection. The three Local Plan documents may only be adopted after it has been shown that they will not adversely affect the integrity of the sites concerned.

Two Appropriate Assessment screening reports were undertaken by Norfolk Council, one jointly for the SSAPD, WAAP, Long Stratton AAP and Cringleford Neighbourhood Plan (http://www.south-norfolk.gov.uk/planning/media/C9_C18_Submission_Documents.zip) and a second for the DMPD (http://www.south-norfolk.gov.uk/planning/media/C62_C65_Submission_Documents_Development_Management_Policies_Documents.zip). It concludes that site proposals within the Local Plan documents either alone, or in combination with other growth proposals identified by the JCS, would be unlikely to have an adverse effect upon the integrity of any European site, subject to the delivery of the necessary mitigation as set out in the Appropriate Assessment of the JCS.

Examination

All three Local Plan documents and accompanying SA documents were submitted to the Secretary of State for examination in April 2014. The original hearing sessions took place between October and December 2014.

The Council produced two additional documents for the examination, post submission, to clarify the SA and site assessment process. These were:

D1: Sustainability Appraisal Technical Background Paper (May 2014)

(http://www.south-norfolk.gov.uk/planning/media/D1_Sustainability_Appraisal_Technical_Background_Paper_May_2014.pdf)

The purpose of this document was to clarify and explain the site assessment process for the SSAPD and WAAP in more detail. It does not introduce any new information or change the SA results, rather it clarified and expanded upon information that already existed.

D25: Further Background Site Assessment/Sustainability Appraisal Summary Document

(<http://www.south-norfolk.gov.uk/planning/media/D25- Further-Background-Site-Assessment-SA-Summary-document.pdf>)

The purpose of this document was to give detailed information about the assessment of sites for housing on a settlement by settlement basis across the district. Again, this document did not introduce any new information; it was prepared to collate information from a number of sources in a clear, transparent and understandable way to show clearly how individual sites were assessed and growth distributed across settlements, summarising succinctly why each individual site was, or was not, preferred for allocation.

Following the initial hearing sessions in October – December 2014 the Inspector requested the Council to undertake some additional SA work to look at the distribution of the ‘floating 1800’ dwellings in the Norwich Policy Area. An SA Addendum (http://www.south-norfolk.gov.uk/planning/media/E36_South_Norfolk_Local_Plan_Draft_SA_Report_Addendum_17-04-15.pdf) was prepared and consulted on publicly during the main modifications consultation in spring 2015. The representations received to this consultation led to an additional hearing session in August 2015. The SA Addendum also included Sustainability Appraisal of the proposed main modifications.

The Council received the Inspector’s Report (http://www.south-norfolk.gov.uk/planning/media/South_Norfolk_Local_Plan_Inspectors_final_report_28SEP15.pdf) on the examination of the three Local Plan Documents in September 2015. Subject to a number of main modifications being made, the documents were found to be “sound”; and in doing so, the Inspector accepted that the Council’s approach to SA was adequate.

b) How the environmental report (Sustainability Appraisal) has been taken into account

The environmental (sustainability appraisal) report was taken account throughout the various stages of the plan making process from preferred options onwards and helped to inform the allocation of preferred sites (and reasonable alternatives where appropriate) and the distribution of the floating 1800 in the NPA through the detailed assessment of sites and the consideration and mitigation of short, medium, long term, cumulative and synergistic impacts of development and monitoring measures. SA was also key in the development of other non-site specific policies in the case of the WAAP and DMPD. The findings and recommendations outlined in the various SA reports were taken into account through the amending and finalising of Plan objectives, policies and site selection.

Site Specific Allocations and Policies Document:

Specifically the environmental report has been taken into account in the following ways through the production of the SSAPD:

- Review of plans, programmes and policies identified a number of key issues that needed to be included when developing the Local Plan documents;
- The identification of key sustainability issues presented an opportunity to address these through policies within the Local Plan documents;
- The Strategic Principles/objectives of the document were tested against the SA Framework to identify and understand potential conflicts. This process identified potential conflicts relating to the allocation of land and environmental protection considerations, areas of flood risk, environmental impacts of traffic generation, the distinctiveness of townscapes and landscapes, minimising loss of undeveloped land and impacts on water quality. It was considered that these impacts could be overcome or mitigated by the appropriate location of development sites and the application of suitable mitigation measures and these were explored through the SA process;
- All individual sites suggested for development were subject to rigorous assessment through the SA process against a detailed site assessment checklist. This enabled the Council to identify preferred options and reasonable alternative sites (where appropriate) for public consultation at the preferred options stage. The detailed site checklist was informed by and tested against the SA Framework and vice versa to increase the robustness of the site selection process. The site assessment process allowed for the comparison of each site on its own merits using professional planning judgement, considering what mitigation would be required to make the site acceptable and whether this mitigation would be likely to result in a viable development. This consideration of issues and identification of mitigation measures translated into the development of policy criteria for each site allocation;
- The effects of the proposed allocations on each settlement/parish were also predicted and evaluated to demonstrate the overall sustainability of the SSAPD. This exercise demonstrated that the overall impact on most settlements would be neutral or positive. Environmental impacts – typically including loss of farmland, local landscape impacts and additional traffic generation – tend to be balanced or exceeded by social and economic gains relating to providing more market and affordable housing, improving access to services and jobs and improving local economies in South Norfolk;

- The site assessment process also informed changes to the development boundaries in the SSAPD as in most cases the development boundary changes derive from the same site assessment process;
- The short, medium, long term, cumulative and synergistic impacts of development were also evaluated through the SA process, which supported the approach taken in the SSAPD. It was concluded that the approach to development in the SSAPD document will have a number of environmental effects. However, most of the effects will be limited – both of a low magnitude and low significance. More significant environmental effects will occur on larger allocations where the magnitude of change is much greater. However the main effects from the growth locations have already been identified in the JCS and appropriate mitigation measure should ensure that the overall environmental effects are not unacceptable.

Wymondham Area Action Plan:

Specifically the environmental report has been taken into account in the following ways through the production of the WAAP:

- Review of plans, programmes and policies identified a number of key issues that needed to be included when developing the Local Plan documents;
- The identification of key sustainability issues presented an opportunity to address these through policies within the Local Plan documents;
- The Strategic Principles/objectives of the document were tested against the SA Framework to identify and understand potential conflicts. This process identified potential conflicts relating to the allocation of land and environmental protection considerations, areas of flood risk, environmental impacts of traffic generation, the distinctiveness of townscapes and landscapes, minimising loss of undeveloped land and impacts on water quality. It was considered that these impacts could be overcome or mitigated by the appropriate location of development sites and the application of suitable mitigation measures and these were explored through the SA process;
- All individual sites suggested for development were subject to rigorous assessment through the SA process against a detailed site assessment checklist. This enabled the Council to identify preferred options and reasonable alternative sites (where appropriate) for public consultation at the preferred options stage. The detailed site checklist was informed by and tested against the SA Framework and vice versa to increase the robustness of the site selection process. Site assessment allowed the comparison of sites, allowed issues to be identified and the identification of mitigation measures which translated into policy criteria. Site assessment allowed the identification of mitigation measures which could

be translated into policy criteria to mitigate any potential adverse impacts of development;

- The SA also considered a number of broad distribution options for new housing and employment land in Wymondham. The effects of the options were predicted, evaluated and mitigated and conclusions were drawn which allowed the identification of preferred options for public consultation;
- The WAAP is more than simply an assessment of sites suggested for development, it also contains non site specific policies and proposals which have been included either because of a direct link to JCS policy, a request from a particular organisation or group or to reflect current planning issues in the town. Although many of these policies and proposals do not have an alternative option, they were still subject to SA to identify any potential effects which needed to be mitigated through the policies in the plan;
- Short, medium, long term, cumulative and synergistic impacts were evaluated through the SA process which supported approach taken. It was concluded that the approach to development in the WAAP document will have a number of environmental effects. In order to meet the need for housing and employment land the majority of new allocations will need to be on greenfield sites there will inevitable be some loss of agricultural land and some impacts on landscape character. However there is also likely to be an increase in the self-sustainability of Wymondham through reaching a better balance of homes and jobs, greater levels of walking, cycling and public transport use and significantly improved levels of green infrastructure in and around the town to alleviate pressure on nearby environmental sensitive areas.

Development Management Policies Document

Specifically the environmental report has been taken into account in the following ways:

- Review of plans, programmes and policies identified a number of key issues that needed to be included when developing the Local Plan documents;
- The identification of key sustainability issues presented an opportunity to address these through policies within the Local Plan documents;
- The Strategic Principles/objectives of the document were tested against the SA Framework to identify and understand potential conflicts. The appraisal demonstrated that the majority of the strategic objectives scored positively against the sustainability objectives, though it highlighted a number of areas where the potential effects demonstrated overall neutrality. In some cases there was conflict with individual DM policy objectives. It should however be remembered that some policy areas will

inevitably tend to conflict with some of the sustainability objectives. For example a direct policy related to economic development is likely to score less well against environmental objectives and a policy on protecting the environment may well be considered to potentially hamper economic development if taken in isolation. It is therefore important that objectives are considered together and a collective view is taken against the sustainability objectives. The SA document highlighted areas of potential conflict which it was considered could be addressed through the flexible application of policy and through positive approach to decision making and early engagement with communities as well as encouraging other parties to take maximum advantage of pre application stages;

- Alternative policy options were generated and tested against the SA framework which led to a number of potential policies being dropped or combined, sub divided or re-ordered to create preferred options;
- Short, medium, long term, cumulative and synergistic impacts were evaluated through the SA process which supported approach taken. The impacts of the DM policies were found to be relatively minor which is to be expected since the purpose of the DM policies are to add detail to the broader principles set out within the JCS and the NPPF. The effects of the policies were found to be generally positive.

c) How opinions expressed in response to:

i. The invitation referred to in regulation 13(2)(d);

ii. Action taken by the responsible authority in accordance with regulation 13(4) have been taken into account

Public engagement is an important aspect of the plan making process. Changes have been made to the documents to take account of issues and concerns raised by consultees up to and following the examination in public. An SA Report has been published with each consultation version of the plans since preferred options stage and consultation bodies and the public were invited to comments on both the document and the accompanying SA at each stage. The Council have produced Consultation Statements for each Local Plan document (both Regulation 19 and Regulation 22(1)(c)) which sets out who was consulted, how they were consulted, a summary of the main issues raised in response to the consultation and how the representations made have been taken into account with the aim of showing how the decision making process has taken account of consultees opinions on the plan and accompanying environmental report at each stage in the plan making process. Throughout the preparation of the Local Plan documents the Council has sought to address the issues raised through the consultation exercises and to reflect these concerns in the content and wording of policies.

In addition to the Consultation Statements, which list all representations received and the Council's responses, the Council have also prepared a separate appendix for each SA document to specifically pull out the Sustainability comments received and Council's response to them. These appendices were updated for the examination to take account of SA comments received at pre-submission stage and can be found at the following links:

<http://www.south-norfolk.gov.uk/planning/media/C26->

[C30 Submission Documents Site Specific Allocations and Policies Documents.zip](http://www.south-norfolk.gov.uk/planning/media/C26-C30_Submission_Documents_Site_Specific_Allocations_and_Policies_Documents.zip)

<http://www.south->

[norfolk.gov.uk/planning/media/C45 C49 Submission Documents Wymondham Area Actio](http://www.south-norfolk.gov.uk/planning/media/C45_C49_Submission_Documents_Wymondham_Area_Actio)
[n_Plan.zip](http://www.south-norfolk.gov.uk/planning/media/C45_C49_Submission_Documents_Wymondham_Area_Actio)

<http://www.south->

[norfolk.gov.uk/planning/media/C67 C71 Submission Documents Development Managemen](http://www.south-norfolk.gov.uk/planning/media/C67_C71_Submission_Documents_Development_Managemen)
[t_Policies_Documents.zip](http://www.south-norfolk.gov.uk/planning/media/C67_C71_Submission_Documents_Development_Managemen)

How the results of public consultation on the plan and sustainability appraisal have been taken into account are considered for each individual document below. Further details can be found in the relevant Consultation Statements:

Sustainability Appraisal Scoping consultation (2010)

Initial consultation on the draft SA Scoping Report took place in 2005/06 at a time when South Norfolk was preparing the Issues and Options stage of a stand-alone Core Strategy and Site Specific Proposals. Comments were sought from the four statutory Sustainability Appraisal bodies at that time: Environment Agency, Countryside Agency, English Nature and English Heritage as well as seven neighbouring local authorities and other stakeholders with environmental, economic and social responsibility. A further consultation took place in 2010 after South Norfolk Council joined with neighbouring local authorities to work on a Joint Core Strategy (JCS). The representations received suggested a number of minor and technical additions and corrections and did not raise any significant issues that would necessitate major changes to the SA appraisal or re-consultation.

Site Specific Allocation and Policies Document

<http://www.south->

[norfolk.gov.uk/planning/media/C25 Statement of Consultation Report Site Allocations Pa](http://www.south-norfolk.gov.uk/planning/media/C25_Statement_of_Consultation_Report_Site_Allocations_Pa)
[rt_1.zip](http://www.south-norfolk.gov.uk/planning/media/C25_Statement_of_Consultation_Report_Site_Allocations_Pa)

<http://www.south->

[norfolk.gov.uk/planning/media/C25 Statement of Consultation Report Site Allocations Pa](http://www.south-norfolk.gov.uk/planning/media/C25_Statement_of_Consultation_Report_Site_Allocations_Pa)
[rt_2.zip](http://www.south-norfolk.gov.uk/planning/media/C25_Statement_of_Consultation_Report_Site_Allocations_Pa)

Issues and Options Consultation (Regulation 18 stage, formerly Regulation 25) (2010)

The 2010 issues and options consultation presented over 1500 sites that had been suggested by landowners and developers and also asked about the future growth of settlements, defining settlement boundaries, other designations or policies the Council could consider and early questions on Area Action Plans. There was also an opportunity for additional sites to be proposed.

An appendix to the Consultation Statement sets out the list of Specific Consultees who were invited to submit representations at this stage. In addition a number of other stakeholders and members of public were also consulted.

The comments received fell broadly into three categories:

- Concern about infrastructure capacity
- Concern about the number and size of sites suggested
- A clear preference for brownfield sites rather than greenfield sites; concern about flooding and requests for more information to local residents about future SSAPD consultations.

The Council's response was:

- To take forward comments about sites when developing preferred options
- To explain in the next consultation how many sites might be required to meet the requirements of the JCS
- To develop the strategic principles of the SSAPD to reflect concerns about flooding, sustainability and stating preference for brownfield land if available and appropriate.

A summary of all the representations received and the Council's responses and actions are included as an appendix to Consultation Statement.

Issues and Options Consultation (Regulation 18 stage, formerly Regulation 25) (2011)

A second Issues and Options consultation took place in 2011. Its principal focus was to seek comments on the additional sites that had been suggested through the previous consultation, although there was also an opportunity to comment on original sites. In addition there was an opportunity to comment on proposed development boundaries, current Local Plan policies and emerging AAPs. The 2011 consultation engaged with the same people as the 2010 consultation.

The comments received can be summarised as follows:

- Continued concern about infrastructure capacity, particularly in the smaller rural service villages
- The need to protect important spaces, landscapes, maintain gaps between settlements and key viewpoints, along with issues to consider for Area Action Plans at Long Stratton and Wymondham were also a common theme in many responses
- An additional 74 sites were also suggested to the Council for consideration.

The Council's response was:

- To take forward the comments about sites and development boundaries for consideration when developing the preferred options
- To commission landscape consultants Chris Blandford Associates to undertake a Landscape Study to review the Local Landscape Character Areas, River Valleys and Strategic Gaps and Important Breaks to inform the Preferred Options stage of the Site Specific Allocations and Policies Document and Area Action Plans for Long Stratton and Wymondham and to inform the merging policies in the Development Management Policies Document
- To take forward the comments on Central Business Areas, Primary Shopping Areas, protection of important spaces, frontages or other suggested designations to the Development Management Policies Document for further consideration
- To consider the additional sites that were suggested and gather view from specific consultees, infrastructure/service providers and parish/town councils.

A summary of all the representations received and the Council's responses and actions are included as an appendix to Consultation Statement.

Preferred Options consultation (Regulation 18) (2012) and Proposed Amendments to Preferred Options consultation (Regulation 18) (2013)

The preferred options public consultation took place in 2012 and presented the Council's preferred site allocations together with policy considerations for their development.

An appendix to the Consultation Statement sets out the list of Specific Consultees who were invited to submit representations at this stage. In addition a number of other stakeholders and members of public were also consulted.

Most of the comments received were similar to those at issues and options stage with concerns about infrastructure capacity and the suitability of settlements to accommodate growth. Objections were also received from people unhappy that particular sites had not been chosen as preferred options. The third type of response was 'technical' responses from key and statutory consultees such as the Environment Agency, Norfolk County Council and Anglian Water.

Analysis of the responses received indicated that some preferred allocations would be difficult to deliver. This led to an 'Amendments to Preferred Options consultation' in 2013, where alternative sites were proposed. In addition some preferred development boundaries were proposed to be significantly amended in response to representations received, most notably from Norfolk County Council (in relation to school landholdings). Significant objections were also received from residents of particular settlements, namely Alington and Trowse. The Council reconsidered these allocations and concluded in the case of Alington that the preferred site was appropriate and in the case of Trowse consulted on a revised option through the amendments to preferred options consultation.

A summary of all the representations received to both consultations and the Council's responses and actions are included as an appendix to Consultation Statement.

Regulation 19 Pre-Submission consultation (2013):

The final stage of consultation on the plan took place in 2013. The key issues raised were:

- Objections to the distribution of the 'floating 1800' in the Norwich Policy Area (that certain locations were to take too much (some smaller locations) or too little (particularly Wymondham) development)
- Representations stating that no 'reasonable alternative' sites were identified in the Norwich Policy Area
- Objections that insufficient dwellings were allocated overall
- Various site specific representations asserting that the sites allocated are inappropriate or that other sites should have been allocated
- Specific objections to the allocation of land at Trowse
- Objections regarding the Sustainability Appraisal and site assessment process.

The Council assessed the representations received and the Council's agreed course of action of each representation fell into the following categories:

- No action required
- Potential changes which could be addressed by making some minor amendments or small changes to the plan without affecting its substantive content or soundness.

A summary of all the representations received and the Council's responses and actions are included as an appendix to Consultation Statement.

Wymondham Area Action Plan

<http://www.south-norfolk.gov.uk/planning/media/C44> *Statement of Consultation Wymondham AAP Part 1 .zip*

<http://www.south-norfolk.gov.uk/planning/media/C44> *Statement of Consultation Wymondham AAP Part 2 .zip*

<http://www.south-norfolk.gov.uk/planning/media/C44> *Statement of Consultation Wymondham AAP Part 3 .zip*

<http://www.south-norfolk.gov.uk/planning/media/C44> *Statement of Consultation Wymondham AAP Part 4 .zip*

Issues and Options Consultation (Regulation 18 stage, formerly Regulation 25) (2010 and 2011)

These were the same consultations that took place for the Site Specific Allocations and Policies Document as described above.

Comments specifically related to Wymondham from the 2010 consultation were:

- Support for the Wymondham AAP from Wymondham Town Council and a request to work with the Council
- Protection of the Strategic Gap between Wymondham and Hethersett
- Maintain the character of the market town
- Protect landscape and view, particularly the Abbey and Tiffey Valley
- Access issues to South Wymondham, particularly regarding the railway bridge (transport and flooding underneath the bridge)

The Council's response was:

- To take forward the comments about sites and issues when developing the Wymondham AAP.

Comments specifically related to Wymondham from the 2011 consultation were:

- Regarding proposed development boundaries at Wymondham
- Regarding the strategic gap between Wymondham and Hethersett
- Regarding how best to deliver the growth at Wymondham
- Regarding the central and primary shopping areas in Wymondham
- Protection of important spaces, frontages and key viewpoints related to features in Wymondham; the Abbey, Tiffey Valley and conservation area.

The Council's response was:

- To take forward the comments and issues raised relating to Wymondham to inform the initial Regulation 18 Wymondham AAP consultation
- To commission landscape consultants Chris Blandford Associates to undertake a Landscape Study to review the Local Landscape Character Areas, River Valleys and Strategic Gaps and Important Breaks to inform the Preferred Options stage of the Site Specific Allocations and Policies Document and Area Action Plans for Long Stratton and Wymondham and to inform the merging policies in the Development Management Policies Document
- To take forward the comments on Central Business Areas, Primary Shopping Areas, protection of important spaces, frontages or other suggested designations to the Development Management Policies Document for further consideration and also inform work on Areas Action Plans. The Council commissioned retail planning consultants GVA to look specifically at retail issues in Wymondham
- To consider the additional sites that were suggested and gather views from Specific Consultees, infrastructure/service providers and parish/town councils.

A summary of all the representations received to both consultations and the Council's responses and actions are included as an appendix to Consultation Statement.

Initial (Regulation 18, formerly Regulation 25) public consultation on the Wymondham Area Action Plan (2012)

The first stage of public consultation specifically on the WAAP took place in 2012. The consultation was launched at public meeting chaired by the local MP and was followed up by sending a leaflet/survey to every household and business in the parish of Wymondham. The Council also wrote to a large number of other people including agents and developers, government organisations, neighbouring local authorities and parish and town councils and neighbouring parish councils, local schools, environment, heritage and amenity groups and transport and utility bodies (as detailed in appendix to Consultation Statement). In total well over 7,000 leaflets and surveys were sent out.

A consultation report was published which summarised the results (see appendix to the consultation statement). The key issues were:

- The retention of Wymondham as a historic market town with a protected centre
- Housing growth to be distributed on smaller sites around the town followed by a preference for housing development to be located in the South Wymondham area

- Improvements to school facilities, health and medical services and surface water and sewerage disposal featuring as top three issues
- Need for wider choices and types of shops including a new supermarket
- Support the need for employment land for start-up small business units
- Support for maintaining the strategic gap between Wymondham and Hethersett
- Strong support for protection of Kings Head Meadow, Tiffey Valley, the Lizard and area around the Abbey and for protecting views of the Abbey from Chapel Lane. More accessible open space in Wymondham.

The key issues were taken forward and used to develop a vision and set of objectives for the Wymondham AAP.

Preferred Options (Regulation 18) (2013)

To inform the development of preferred options for the WAAP a number of events took place with stakeholders and the comments received fed into the development of preferred options. In particular there was consultation with local schools and a planning workshop for invited guests.

An appendix to the Consultation Statement sets out the list of Specific Consultees who were invited to submit representations at this stage. In addition a number of other stakeholders and members of public were also consulted.

The key issues were:

- Support for the Ketts Country Landscape but the need to clarify the approach towards green infrastructure and biodiversity in the document with links across to recreation provision
- Concern about development to the north of the town and support for the strategic gap between Wymondham and Hethersett
- Concern about development to the west and south-west of the town and requests for a policy to address the protection of the historic landscape setting of the town and Abbey
- A balance of support and concern regarding the Council's preferred option for housing growth in South Wymondham under the railway bridge and the need for an extensive buffer zone to the Lizard
- The need to clarify whether 2,200 houses is a maximum or minimum number in the AAP and what happens about sites granted planning permission under the 5 year land supply argument
- A number of detailed comments on the Interim Sustainability Appraisal.

The Council's response was:

- To organise an environmental workshop for invited guests to examine what should be meant by the Ketts Country Landscape and how this should be translated into policies in the AAP

- Move consideration of the Strategic Gap to the Development Management Policies Document (see above under the Development Management Policies section for details of how the Strategic Gap concerns were considered)
- To add text to the plan to address the protection of the historic landscape setting of the town and abbey
- To develop a document entitled 'Connecting South Wymondham' to address connectivity issues in South Wymondham. Issues with the Lizard were discussed through the improved approach to green infrastructure
- To conclude that 2,200 houses should be a maximum figure based on constraints in the town, and that sites granted planning permission since 2008 should count towards the 2,200 figure. The Council subsequently de-allocated some sites from the preferred options document which did not have planning permission
- To take account of Sustainability Appraisal comments in the Pre-Submission version of the SA.

Regulation 19 Pre-Submission consultation (2013)

The final stage of consultation on the plan took place in 2013. The key issues raised were:

- Objection to the allocation of 2,200 dwellings in Wymondham on the grounds that Wymondham can and should accommodate more than the minimum number of dwellings – lack of flexibility
- No evidence that the Council sustainability appraised any reasonable alternative scenarios involving housing numbers greater than 2200. None of the 'floating 1800' apportioned to Wymondham
- No robust evidence to support the limit of 2,200 houses due to secondary education capacity constraints
- The deliverability of the WYM 3 (South Wymondham) allocation due to infrastructure constraints
- No provision for the expansion of recycling facilities.

The Council assessed the representations received and the Council's agreed course of action of each representation falls into the following categories:

- No action required
- Potential changes which could be addressed by making some minor amendments or small changes to the plan without affecting its substantive content or soundness.

A summary of all the representations received and the Council's responses and actions are included as an appendix to Consultation Statement.

Development Management Policies Document

http://www.south-norfolk.gov.uk/planning/media/C66_Statement_of_consultation_Development_Management_Policies_Part_1.zip

http://www.south-norfolk.gov.uk/planning/media/C66_Statement_of_consultation_Development_Management_Policies_Part_2.zip

Issues and Options Consultation (Regulation 18 stage, formerly Regulation 25) (2010 and 2011)

These were the same consultations that took place for the Site Specific Allocations and Policies Document as described above.

The consultation in 2010 was primarily about locations for new development but it also provided an opportunity for comments about other policy designations which should be considered. The issues raised were included in the 2012 Issues and Options consultation (see below) for wider comment and views.

The consultation in 2011 was again focussed on sites suggested for development but it also sought comments about certain Development Management policies, specifically Strategic Gaps/important breaks, landscape character areas and river valleys, areas that contribute towards maintaining the landscape setting of Norwich, protection of important spaces, frontages and viewpoints and Central Business Areas and Primary Shopping Areas.

The Council's response was:

- To take forward the comments and issues raised to inform the initial Development Management Policies Issues and Options consultation
- To commission landscape consultants Chris Blandford Associates to undertake a Landscape Study to review the Local Landscape Character Areas, River Valleys and Strategic Gaps and Important Breaks to inform the Preferred Options stage of the Site Specific Allocations and Policies Document and Area Action Plans for Long Stratton and Wymondham and to inform the merging policies in the Development Management Policies Document
- To take forward the comments on Central Business Areas, Primary Shopping Areas, protection of important spaces, frontages or other suggested designations to the Development Management Policies Document for further consideration and also inform work on Areas Action Plans.

A summary of all the representations received to both consultations and the Council's responses and actions are included as an appendix to Consultation Statement.

Issues and Options (Regulation 18) consultation (2012)

The Issues and Options consultation took place in 2012 and presented a number of issues and questions grouped in four chapters – policies with first principles, policies for prosperity, policies for people and policies for environment.

An appendix to the Consultation Statement sets out the list of Specific Consultees who were invited to submit representations at this stage. In addition a number of other stakeholders and members of public were also consulted.

A large number of comments were received on a wide range of issues and more detail can be found in the Consultation Statement. Following the consultation the policies were amended where appropriate to take into account the representations made.

Preferred Options (Regulation 18) (2013)

Preferred Options consultation took place in 2013. It presented the Council's preferred development management policies

An appendix to the Consultation Statement sets out the list of Specific Consultees who were invited to submit representations at this stage. In addition a number of other stakeholders and members of public were also consulted.

The key issues raised were:

- Considerable concern raised about the designation of the primary shopping area in Diss, specifically the exclusion of the Diss Heritage Triangle
- Difference in opinion regarding space standards for dwellings (some in favour, some opposed)
- Objection to the inclusion of certain parcels of land at Wymondham and Hethersett in the strategic gap
- A number of detailed comments regarding the Interim Sustainability Appraisal.

The Council's response was:

- To amend the wording to make Diss retail policy clearer and support the Diss Heritage Triangle
- Retain the space standards policy with modifications to allow exceptions in certain cases
- Exclude a small area of land from the strategic gap at Hethersett but no changes proposed to the gap at Wymondham

- To address detailed comments on the Interim Sustainability Appraisal in the SA Report.

A summary of all the representations received and the Council's responses and actions are included as an appendix to Consultation Statement.

Regulation 19 Pre-Submission consultation (2013)

The final stage of consultation on the plan took place in 2013. The key issues raised were:

- Town centre policies and thresholds for retail, questioning the thresholds for sequential test and impact assessments
- Objection to the 'employment use first' principle in the rural building conversion policy
- The policy specifying minimum internal space standards Local landscape policies relating to the strategic gap and bypass protection zone do not accord with the NPPF and are therefore unjustified. Precise boundaries of the strategic gap are not appropriate and Trowse should not be removed from the bypass protection zone.

The Council assessed the representations received and the Council's agreed course of action of each representation falls into the following categories:

- No action required
- Potential changes which could be addressed by making some minor amendments or small changes to the plan without affecting its substantive content or soundness.

A summary of all the representations received and the Council's responses and actions are included as an appendix to Consultation Statement.

Main Modifications consultation

Following the hearing sessions on the three Local Plan documents the Council consulted on proposed Main Modifications to the Plan in Spring 2015. The Inspector reflected on the changes put forward by the Council and all representations made in responses to them when preparing his final report.

At the examination hearing sessions objectors raised some concerns about the distribution of the 'floating 1800' and the Council's approach to the assessment of reasonable alternatives in the Norwich Policy Area (NPA). Following the original examination hearings, the Inspector wrote to the Council identifying that further SA work was necessary to give consideration to alternative ways of meeting the JCS Policy 9 requirement to distribute 1800 new dwellings within the NPA part of South Norfolk.

In response the Council commissioned AECOM to undertake an SA Addendum (http://www.south-norfolk.gov.uk/planning/media/E36_South_Norfolk_Local_Plan_Draft_SA_Report_Addendum_17-04-15.pdf). This document looked at alternative approaches to site allocation of the 'floating 1800' looking at both Wymondham and other settlements in the NPA. The SA Addendum was consulted on as part of the Proposed Main Modifications and any responses received were forwarded to the Inspector to be considered by him when writing his report. As a consequence of the comments received the Inspector decided to hold an additional hearing session in August 2015.

d) How the results of any consultations entered into under regulation 14(4) have been taken into account

Regulation 14(4) relates to where the Secretary of State receives a request from another EU Member State indicating that it wishes to enter into consultations on trans-boundary impacts before the adoption, or submission of a plan or programme. This is not relevant to the three Local Plan documents as no such request was received and therefore no additional consultation of this nature was undertaken.

e) The reasons for choosing the plans as adopted, in the light of other reasonable alternatives;

This section provides a summary for each document to explain how reasonable alternatives were considered and why the adopted plan was chosen when compared with the other reasonable alternatives considered during its preparation.

It is important to note that some aspects of the consideration of alternatives was dealt with through the preparation of the JCS such as the determination of the settlement hierarchy and the locations for major growth and the quantum of growth to be allocated to various settlements. The three Local Plan documents have been prepared to be in general conformity with the JCS.

Site Specific Allocations and Policies Document

The consideration of alternatives has been a fundamental element in the development of the SSAPD as set out in the SA report. The Council assessed a large number of sites, only discounting those that did not conform with the JCS settlement hierarchy (e.g. those in Smaller Rural communities where no allocations were proposed) or which were not within 400m of a development boundary or built up area of a neighbouring higher order settlement at an early stage. All other

submitted sites were therefore assessed as potentially acceptable allocations and assessed on their merits.

All sites were appraised individually against a detailed site assessment checklist and conclusions drawn. The site assessment process allowed sites to be compared and led to the identification of preferred options sites for housing, employment and other uses in line with the settlement hierarchy in the JCS and these were consulted on through the Preferred Options consultation in 2012.

In the rural part of the district the Council consulted on preferred sites for allocation, plus a number of reasonable alternative sites which also scored well against the site assessment checklist.

In the Norwich Policy area the Council had to take a different approach to the assessment of alternatives because Policy 9 of the JCS allocates a minimum of 1800 dwellings to 'smaller sites in the [South Norfolk] part of the Norwich Policy Area and possible additions to named growth locations. No reasonable alternatives were identified in the Norwich Policy Area but sites for housing that scored well against the assessment checklist but were not preferred options were considered as part of the 'floating 1800' smaller sites allowance' required by Policy 9 of the JCS.

The Council produced a further background site assessment/SA summary document for the examination D25: Further Background Site Assessment/Sustainability Appraisal Summary Document (<http://www.south-norfolk.gov.uk/planning/media/D25-Further-Background-Site-Assessment-SA-Summary-document.pdf>) to collate site assessment information in a clear, transparent and understandable way to show clearly how individual sites were assessed and growth distributed across settlements, summarising why each individual site was, or was not, preferred for allocation.

Through the preferred options consultation some issues were raised with a small number of the Councils preferred sites, leading to the conclusion that these sites would be difficult to deliver. This led to an Amendments to Preferred Options consultation where a number of reasonable alternative sites were proposed. Where there was no reasonable alternative replacement then no site was allocated.

The SSAPD SA Report also looked at the overall sustainability of the chosen distribution of development to justify the reason for selecting the proposed approach. It looks at short, medium and long term impacts as well as cumulative and synergistic impacts and concludes that significant effects, both positive and negative are likely in a number of areas from the proposed approach but that it is possible to reduce or avoid many of these.

Wymondham Area Action Plan

As with the SSAPD the consideration of alternatives has also been fundamental in the development of the WAAP. Initially the WAAP followed the same site assessment process as the SSAPD and all sites were appraised individually against a detailed site assessment checklist and conclusions drawn.

Because of the high level of growth allocated to Wymondham in the JCS and the need to consider this against a number of constraints affecting the location and quantum of growth in the town the Council felt that the SA needed to look at broad options for growth in addition to the individual assessment of sites. The Council therefore used the results of the individual site assessments together with comments from public consultation, the objectives of the AAP and the key sustainability issues identified in the SA Scoping Report to develop a number of options for the distribution of housing and employment growth in the town.

To enable the effects of the options for the distribution of housing and employment growth in Wymondham to be predicted each option was tested against the SA Framework. This showed that each option has potential positive and negative effects which have been summarised and evaluated in the SA document to allow the Council to develop its Preferred Options for housing and employment growth.

The Council also tested the other policies and proposals in the AAP against the SA Framework to determine whether these would have any significant effects. It was shown that the other policies and proposals would have mainly positive effects, with the exception of the relocation of Wymondham Rugby Club, in terms of impact on the Strategic Gap and the use of greenfield land.

The WAAP SA Report also looked at the overall sustainability of the chosen distribution of development to justify the reason for selecting the proposed approach. It looks at short, medium and long term impacts as well as cumulative and synergistic impacts and concludes that significant effects, both positive and negative are likely in a number of areas from the proposed approach but that it is possible to reduce or avoid many of these.

SA Addendum

At the examination hearing sessions objectors raised some concerns about the distribution of the 'floating 1800' and the Council's approach to the assessment of reasonable alternatives in the Norwich Policy Area. Following the examination hearings the Inspector wrote to the Council identifying that further SA work was necessary to give consideration to alternative ways of meeting the JCS Policy 9 requirement to distribute 1800 new dwellings within the NPA part of South Norfolk.

In response the Council commissioned AECOM to undertake an SA Addendum (http://www.south-norfolk.gov.uk/planning/media/E36_South_Norfolk_Local_Plan_Draft_SA_Report_Addendum_17-04-15.pdf). This document looked at alternative approaches to site allocation of the 'floating 1800' looking at both Wymondham and other settlements in the NPA. In the case of Wymondham the addendum looked at nine 'reasonable alternative' sites grouped into sites in the north and south west of the town and appraised a number of alternative scenarios ranging from low through to very high additional growth. In terms of the other settlements the Council reviewed allocations in the wider Norwich Policy Area and found a number of sites without planning permission and appraised the Councils current allocations against a reduced allocation approach.

The Council's conclusion was that of all the alternatives tested for the distribution of the floating 1800 dwellings the most appropriate is the Pre-Submission distribution of housing. It was concluded that taking into account the findings of the original SA Reports and the SA Addendum work that the benefits generated through additional housing in Wymondham (principally delivering housing and affordable housing and economic growth) are outweighed by the negative impacts of this growth, principally the impact of high schooling but also the impacts on Wymondham's landscape and historic setting and potential increased traffic congestion and pollution. The benefits of reducing allocations in other settlements are also concluded to be outweighed by the disadvantages, particularly the impact on the delivery of local infrastructure and loss of affordable housing in rural areas.

Development Management Policies Document

The document should be consistent with higher level strategic and national policies, consequently the scope for alternative policy options was constrained and the focus was on the policy alternatives necessary to promote and achieve future sustainable development in the face of local opportunities, problems and issues. Because the NPPF effectively provides a default planning policy in the absence of up to date Local Plan policy the policy alternatives considered generally included an alternative option of having no South Norfolk DM policy and relying on higher level policies. Other options considered included the inclusion of some more or less stringent policies on certain aspects

In every case the Preferred Options Policy was found to perform better or at least as well as the reasonable alternative considered. All of the Preferred Option policies were found to have an overall positive or neutral impact on all the Framework Objectives and support the future sustainable development in South Norfolk. The appraisal process identified a number of improvements to draft Preferred Options Policies. All the recommended improvements were then included in the Preferred Options consultation document.

f) The measures that are to be taken to monitor the significant effects of implementation of the plans

The SEA Directive requires the significant environmental effects of plans and programmes to be monitored, in order to identify at an early stage unforeseen adverse effects and to be able to take appropriate action where necessary. Monitoring of significant effects will also include social and economic effects that have been predicted through the SA.

Under Section 35 of the Planning and Compulsory Purchase Act 2004 planning authorities are required to monitor and report on the implementation of Local Plan policies. The Sustainability Appraisal indicators must also be monitored.

The JCS has a policy on implementation (JCS 20) and discusses monitoring. The three district councils of the GNDP produce a single combined Annual Monitoring Report each year, principally to monitor the JCS and the adopted Local Plan documents, including sustainability appraisal objectives.

The SA reports for the three Local Plan documents each contain the same monitoring framework and will all track the same indicators as the JCS, which will be reported in the AMR. This will ensure that the significant effects of implementing the plan are monitored.

The Council are committed to working with its GNDP partners to ensure that the monitoring framework is up to date and reflects the key issues that have emerged through the plan making/SA process.

In addition to this all three Local Plan documents contain monitoring frameworks to track the implementation of the policies in the individual plans. It is intended that these more local indicators will be reported on as an appendix to the wider AMR document.