

Sustainability Appraisal and Strategic Environmental Assessment of the GNLP (Regulation 18 (C) - January 2020)

Orbit Homes and Bowbridge Strategic Land representations, prepared by David Lock Associates



Introduction

This representation relates to the Sustainability Appraisal (SA) approach that the Greater Norwich Development Partnership (GDNP) has employed and which forms the evidence base for the emerging Greater Norwich Local Plan (GNLP). These representations are submitted alongside and supplement comments on the GNLP Strategy Document and GNLP Sites Document. The covering letter prepared by David Lock Associates (DLA) provides the background to these representations and sets out the full suite of supporting information that is provided in this submission.

The emerging GNLP has been subject to a number of Regulation 18 consultations:

- Regulation 18 (a) consultation – included the Interim Sustainability Appraisal, which included assessment of reasonable alternative policy options and was consulted on for information only. No comments are offered on this SA document within these representations.
- Regulation 18 (b) consultation – no SA was consulted upon during this consultation. No comments on this consultation are offered within these representations.
- Regulation 18 (c) consultation (*current consultation*) – the Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (Regulation 18 (C) - January 2020) is the document which these representations relate to.

Part 1 of these representations consider the SA site assessment for Silfield Garden Village (GNLP Site Ref: GNLP2168) (hereinafter referred to as SGV).

Part 2 of these representations consider the SA site assessment for the three new settlement proposals (Silfield Garden Village; West of Hethel; and Honingham Thorpe).

Overall Approach

We consider that the SA fails to evaluate the proposed policy options and their effects alongside alternative policy options. No assessment is made of **reasonable alternative spatial options for accommodating growth**: the SA limits itself to a consideration of 'reasonable alternative sites'.

On this basis, we suggest that the approach to the SA and the SA itself, is in conflict with the Planning Practice Guidance (PPG) [Paragraph 018, Reference ID: 11-018-20140306], which explicitly states:

"...the sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. ..."

Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made."

Fundamentally, as the key policy for the growth strategy, Policy 1 has not been assessed against reasonable alternatives. This does not accord with the PPG and undermines the robustness of the entire Plan and its spatial strategy. Were the spatial growth strategy set out in Policy 1 to be assessed

against reasonable alternative spatial strategies, it is not inconceivable that an alternative spatial pattern of growth would result in more favourable SA outcomes.

On this basis, we consider that the SA which forms the part of the evidence base of the GNLP does not meet the requirements of the PPG. We contend that the failure to assess reasonable alternative spatial options is a flaw of the SA and undermines the soundness of the Plan's approach to allocating growth of the SA as it currently stands, and suggest that the GNDP should reconsider the assessment and undertake a more robust SA of alternatives prior to the formal submission of the GNLP to the Planning Inspectorate.

Methodology and Scoring

We consider that the SA methodology approach has not been made clear. The interrelationship of the SA with the Site Assessment booklets, which informed the allocations within the GNLP Sites Document (*See separate representation on this point*) is not explicit.

More detailed points are made below.

Part 1 - the SA site assessment for SGV

The GNDP has employed Lepus Consulting to undertake an appraisal of each reasonable alternative site considered by the GNDP. Each appraisal includes a SA impact matrix which provides an indication of the nature and magnitude of impacts pre-mitigation. Assessment narratives follow the impact matrices for each site within which the findings of the appraisal and the rationale for the recorded impacts are described. The GNDP have identified 287 reasonable alternative sites, for residential, employment or mixed uses.

SGV is identified as a 'reasonable alternative site' and assessed as such within the SA.

Notwithstanding the procedural concerns we have raised at [*Paragraphs 3.11 – 3.26 in the GNLP Sites Document Representation*] in relation to the treatment of SGV as a reasonable alternative, we have significant concerns regarding the SA Site Assessment proforma completion for the SGV proposal. Most notably, that the grouping of two or more criteria/issues under the 15 Objectives means that positive scorings for individual criteria have been grouped into an overall negative scoring and vice versa, giving a misleading indication of the relative sustainability of each site. We therefore strongly consider that the SA should be updated to provide an individual scoring for each of the criteria assessed. It will then allow a grouping of scores to be made if appropriate but underpinned by more robust assessment scores.

Set out below is our commentary on the SA undertaken for SGV (in relation to the site assessment proforma for SGV forming part of the *Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (Regulation 18 (C) - January 2020)*). The table below suggests where an alternative score should be given, and the reason for this change:

Table 1: Alternative Sustainability Assessment – Silfield Garden Village (GNLP Site Ref: GNLP2168)

SA Objective: Criteria	SA Objective Details (as per SA documentation)	Original SA Score	Suggested revised SA score	Reason for Suggested Revised Score
<p>1. Air Quality & Noise:</p>	<p>Main Road: The A11 passes through the south east of Wymondham. Site GNLP2168 is located adjacent to this road. Therefore, the proposed development at GNLP2168 could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using the A11 would be expected to have a minor negative impact on air quality and noise at these sites.</p> <p>Air Pollution: Sites GNLP0006, GNLP0032, GNLP0354, GNLP0507, GNLP0515, GNLP0525R, GNLP1055, GNLP2150 and GNLP2168 are proposed for the development of 100 or more dwellings. The proposed development at these nine sites could potentially result in a significant increase in local air pollution; therefore, a major negative impact would be expected.</p>	--	0	<p>Given the assessment of 'minor negative impact' in the commentary for proximity to highways and 'major negative impact' on air pollution simply by virtue of the site being larger than 100 dwellings, it is unclear why an overall score of Major Negative is given.</p> <p>Developments need to demonstrate good access to the road and rail network to meet other sustainability objectives. Any 'potential' air and transport pollution associated with proximity to the A11 would need to be mitigated through development.</p> <p>At SGV, the technical work submitted with our representations demonstrates that any potential for increased levels can be appropriately mitigated through masterplanning and detailed design to ensure no unacceptable impact upon the end user.</p> <p>If the current SA approach in the Reg 18 plan were to be taken to its logical conclusion, no development would be acceptable if located close to major highways. Given the need for new developments at scale to demonstrate effective access to the strategic highway whilst managing any negative impacts, the SA criteria and scoring does not appear logical.</p> <p>In summary, given the 'potential' nature of the impact, the conflict with other SA objectives of providing effective access to the highway network, and the grouping together of the criteria under SA1, we suggest that a SA score of 'negligible' against SA1 would be a more accurate assessment for SGV.</p>

<p>2. Climate Change & Mitigation:</p>	<p>Carbon Emissions: Sites GNL0006, GNL0515, GNL0525R, GNL1055 and GNL2168 are proposed for the development of 663 dwellings or more. The proposed development at these five sites could potentially increase local carbon emissions, as a proportion of South Norfolk's total, by more than 1%. Therefore, a major negative impact would be expected.</p>	<p>--</p>	<p>++</p>	<p>As noted above, we suggest that a different approach needs to be taken in the SA of the Plan in relation to climate change and mitigation (and indeed, strongly suggest that in order to be found sound, an SA of the spatial strategy must be undertaken before individual sites are considered, as the climate change outcomes of reasonable alternative spatial strategies have not been considered as part of the SA).</p> <p>Nevertheless, as far as the individual site assessment applies, from the wording with the SA it appears that site GNL2168 has been assessed in combination with four other potential allocation sites which are unrelated other than being located in the same area.</p> <p>This is in contrast to the approach elsewhere (for example for the sites which together make up the Honingham Thorpe New Settlement proposal) where these sites have been assessed separately and have received varying SA outcomes against SA Objective 2.</p> <p>The SA also appears to assume that the impact of any new development on carbon emissions is (a) automatically and universally negative, and (b) increases exponentially with scale. This approach is flawed.</p> <p>We consider that neither the grouping of sites, the assessment methodology in relation to carbon emission impact nor the resultant scoring represents an accurate or fair assessment of sites.</p> <p>New development at scale is often selected for allocation as a more appropriate response than dispersed development for tackling climate change objectives through its ability to generate lower per capita carbon emissions resulting from greater self-containment and the built-in provision of better ped/cycle and PT facilities from the outset. SGV proposal is committed to delivering a net zero carbon</p>
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	<p>Fluvial Flooding: <i>A proportion of site GNL2168 is located within Flood Zones 2 and 3a. The proposed development at this site could potentially locate some site end users in areas at risk of fluvial flooding; therefore, a major negative impact would be expected.</i></p> <p><i>A proportion of site GNL2168 coincide with areas determined to be at low, medium and high risk of surface water flooding. The proposed development at this site would be expected to have a major negative impact on pluvial flood risk, as development would be likely to locate site end users in areas at high risk of surface water flooding, as well as exacerbate pluvial flood risk in surrounding locations.</i></p>			<p>development. As such, it is not reasonable to assume that the site will result in per capita carbon emissions any greater than any other development within South Norfolk or the GNL2168 area. Given the opportunity for built-in carbon reduction measures as part of the GV model, we consider that a more appropriate score for this SA objective when assessed against other sites would be a major positive.</p> <p>With regard to fluvial flooding, development proposals have to demonstrate that development does not result in unacceptable increases in fluvial flood risk or surface water flooding.</p> <p>A review of the online Flood Map for Planning shows the SGV site is predominantly located within Flood Zone 1 'Low Probability'. An area along the western boundary of the site is located within Flood Zone 3 'High Probability'. This area is adjacent to the Bays River and likely functions as a floodplain (see section 4 of the Technical Report on Flood Risk and Drainage submitted with our representations for further details). As such, the master plan for the SGV has kept this area free from development.</p> <p>With regard to surface water flooding, the modelling undertaken to inform the SGV masterplan indicates those areas to be kept free of development and also how the proposed surface water strategy for the GV gives an opportunity to provide some betterment to control rapid agricultural runoff which is likely to be present in the local catchment.</p> <p>On this basis (and indeed, adopting a consistent approach to other parts of the SA, e.g. SA10 Education, where the proposed features of the GV are taken into account in the assessment), we suggest that the overall grouped score against SA2 should be 'major positive'.</p>
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<p>3. Biodiversity, Geodiversity & GI</p>	<p>Ancient Woodland: Site GNLP2168 coincides with 'Peasacre Wood'. The proposal for this site would be expected to retain this stand of ancient woodland, however, the proposed development could potentially be located adjacent to the woodland.</p> <p>Priority Habitat: Site GNLP2168 coincides with deciduous woodland priority habitat and a small area of traditional orchard priority habitat. The proposed development at this site would likely to result in the partial loss of these habitats, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.</p>	-	+	<p>Masterplanning already undertaken, and appropriate planning conditions/obligations will ensure that the ancient woodland and any identified priority habitats are retained.</p> <p>We consider that the effective management of these assets required through any consented development, together with the change in land use from intensively farmed agriculture to a wide variety of open space, wooded and surface water attenuation habitats associated with the GV will enhance their value for biodiversity and secure their long term future.</p> <p>On this basis, (and indeed, adopting a consistent approach to other parts of the SA, e.g. SA10 Education, where the proposed features of the GV are taken into account in the assessment) we consider that SGV would result in a 'minor beneficial' impact on these habitats.</p>
<p>4. Landscape</p>	<p>Landscape Character: GNLP2168 is located within the LCA 'Tiffey Tributary Farmland'. Some key characteristics of this LCA include large scale arable farmland, water bodies, sparse settlements and long views. A small proportion of Site GNLP2168 is located within the LCA 'Wymondham Settled Plateau Farmland'. Some key characteristics of this LCA include large scale arable fields, large towns and villages, and long views. A small proportion of Site GNLP2168 is also located within the LCA 'Ashwellthorpe Plateau Farmland'. Some key characteristics of this LCA include arable fields, panoramic views and linear settlements along roads. Therefore, the proposed development at this site could potentially be discordant with these key characteristics and would be expected to</p>	-	-	<p style="text-align: center;"><i>Unchanged</i></p> <p>NB. The technical baseline report on Landscape submitted to accompany these representations demonstrates that notwithstanding some degree of landscape and visual impact, the masterplanning of SGV is based on a sensitively designed scheme with respect to landscape impact and can come forward with only limited landscape and visual effects at a localised level. We therefore concur with the SA assessment for the four landscape criteria under SA4.</p>

	<p>have a minor negative impact on the local landscape character.</p> <p>Views from the PRow Network: Site GNLP2168 coincides with a PRow. The proposed development at this site could potentially alter the views experienced by users of the PRow network; therefore, a minor negative impact on the local landscape would be expected.</p> <p>Views for Local Residents: Site GNLP2168 comprise large areas of previously undeveloped land, situated in close proximity to surrounding small settlements including Silfield and Hethel. The proposed development at this site would likely alter views experienced by local residents of surrounding dwellings to some extent, and therefore, a minor negative impact on the local landscape would be expected.</p> <p>Urbanisation of the Countryside: Site GNLP2168 comprises previously undeveloped land and are located outside the existing settlement of Wymondham. Sites GNLP1055 and GNLP2168 in particular could potentially result in a significant extent of urbanisation as both sites are proposed for the development of new garden villages. Therefore, the proposed development at this site could potentially contribute towards the urbanisation of the countryside. A minor negative impact on the local landscape would be expected.</p> <p>Coalescence: Site GNLP2168 is proposed for the development of a new garden village, located in close proximity</p>			
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	<i>to surrounding small settlements including Silfield and Hethel. The proposed development at this site could potentially increase the risk of coalescence between these settlements; therefore, a minor negative impact on the local landscape would be expected.</i>			
5. Housing	Net Gain: <i>GNLP2168 is proposed for the development of 100 or more dwellings; therefore, the proposed development at this site would be expected to result in a major positive impact on housing provision.</i>	++	++	Unchanged
6. Population & Communities	Local Services: <i>GNLP2168 is proposed for the development of a new garden village, which would be expected to include local services within new district centres. The proposed development at this site would be expected to have a minor positive impact on site end users' access to local services.</i>	+	+	Unchanged
7. Deprivation	<i>The purpose of this objective is to help redress deprivation issues across the Plan area. None of the site proposals assessed in this report will be expected to redress these issues. At this stage, it is assumed that development proposals at all of the reasonable alternative sites would have a negligible impact for this objective</i>	0	0	Unchanged
8. Health	Green Network: <i>Site GNLP2168 for a new garden village would be expected to include public greenspaces, including new Country Parks and community facilities such as playing fields and open spaces. Therefore, a minor positive impact would be expected at this site, as the proposed</i>	--	+	We do not consider the grouping of the selected criteria under a single 'health' heading is either sensible or helpful in the undertaking of a sound SA for potential development sites, neither does it take into account the expected on-site provision of health and community facilities associated with a GV.

	<p><i>development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.</i></p> <p>Main Road: <i>Site GNLP2168 is located adjacent to the A11. The proposed development at this site could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users.</i></p> <p>AQMA: <i>GNLP2168 is located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users.</i></p> <p>NHS Hospital: <i>The closest hospital with an A&E department to Wymondham is Norfolk and Norwich University Hospital, located approximately 8.5km north east of the cluster. The proposed development at GNLP2168 could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.</i></p> <p>GP Surgery: <i>The Windmill Surgery and Wymondham Medical Centre are both located within Wymondham. Site GNLP2168 is located outside the target distance to these GP surgeries, and therefore, the proposed development at this site would be expected to have a minor negative impact on the access of site end users to GP surgeries.</i></p>			<p>Furthermore, individual assessments for SGV against each of the criteria are either minor negative (x 3) or minor positive (x3). It is therefore unclear why an overall major negative scoring has been given.</p> <p>Specifically, there are a number of scores that we do not consider are sound. Taking each criteria in turn:</p> <ul style="list-style-type: none"> • We concur with the level of green infrastructure that the SA assumes is to be provided as part of the GV. However, we consider that this would give rise to a 'major' rather than 'minor' positive impact on health and wellbeing; • The health impact of traffic emissions has already been assessed as part of the Air Quality criteria under SA1. There is therefore an element of double counting in the SA which gives undue weight to certain outcomes when considered against other equally valid SA objectives, and should be deleted from one of either the health or air quality objective; • AQMA – no comment other than to suggest this criteria also duplicates the assessment under SA1 and therefore accords it proportionately greater weight; • We are at a loss to see why a negative score has been given on the basis that the development of the GV site could "restrict the access of site end users" to the Hospital. SGV is proposed to be accessed directly off a new junction on the A11 and to include improved PT transport services which will enhance accessibility to Norwich from both the site and Wymondham itself. We therefore consider that access to the Hospital will not be affected (and indeed, would be improved on PT). On this
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	<p>Leisure Centre: Wymondham Leisure Centre is located in the centre of Wymondham. Site GNLP2168 is located outside the target distance to this leisure facility, and therefore, a minor negative impact on the health and wellbeing of site end users would be expected at this site.</p> <p>As site GNLP2168 is are located outside the target distance to an NHS hospital, GP surgery and leisure centre, the proposed development at this site would be expected to have a major negative impact on the health and wellbeing of site end users.</p>			<p>basis, we suggest a negligible or minor positive score should be given;</p> <ul style="list-style-type: none"> When planning at Garden Village it is expected that the day to day needs of its residents are met on site. This would include medical and other local health facilities including a GP surgery. Therefore (and on the same basis as the approach set out in SA10 for education) the score against this criteria would be minor positive (as a minimum); Similarly, on-site formal sports provision is also included in the GV proposal. Therefore, whilst we do not propose a second leisure centre for Wymondham, the quantum of on-site outdoor sports, leisure and recreation facilities would suggest a minor positive score should be applied. <p>On this basis, we consider that SGV should score an overall minor positive score against this SA objective.</p>
9. Crime	<p>The purpose of this objective is to help reduce crime rates in the local area. It is not possible to assess the impacts of residential site proposals on local crime prevention or crime rates. At this stage, it is assumed that development proposals at all of the reasonable alternative sites would have a negligible impact for this objective.</p>	0	0	Unchanged
10. Education	<p>Primary School: Browick Road Primary and Nursery School, Robert Kett Primary School and Ashleigh Primary School and Nursery are located within Wymondham. Site GNLP2168 is proposed for the development of a new garden village which would be expected to include new primary education. The proposed</p>	+	+	Unchanged

	<p>development at this site would be likely to result in a minor positive impact on site end users' access to primary education.</p> <p>Secondary School: Wymondham High Academy is located in the centre of Wymondham. Site GNLP2168 is proposed for the development of a new garden village which would be expected to include new secondary education. The proposed development at this site would be likely to result in a minor positive impact on site end users' access to secondary education.</p>			
11. Economy	<p>Primary Employment Location: Wymondham Town Centre is located in close proximity to the Wymondham cluster. This location would be expected to provide a range of employment opportunities for site end users. Therefore, the proposed development at Site GNLP2168 would be expected to have a minor positive impact on the local economy.</p> <p>Employment Floorspace: Site GNLP2168 is proposed for mixed use development including commercial, employment and/or employment end uses. This would be expected to result in the provision of employment opportunities in the local area, and therefore, a major positive impact on the local economy would be expected as a result of development at this site.</p>	+	++	<p>The economic case underpinning SGV site is set out in the Economic Strategy Statement submitted in support of these representations.</p> <p>SGV is situated at the heart of the Cambridge -Norwich Tech Corridor, with direct access along the A11 to key employment destinations at NRP and the University, and but also well-related to the existing primary employment location of Wymondham.</p> <p>As such, both its proximity to existing employment destinations and the inclusion of new employment floorspace as an integral part of the GV should generate a 'major positive impact' for the local economy in SA terms.</p> <p>This major positive score is further supported by the provision of new homes at SGV which are close to SW Norwich, within the investment focus of the Tech Corridor, and accessible to other key employment centres to the west and east by rail as well as road/PT.</p>
12. Transport & Access to Services	<p>Bus Stop: Site GNLP2168 is located outside the target distance to a bus stop providing regular services. Therefore, the</p>	-	+	<p>For both public transport provision, and access to on-site and off-site services, the SGV proposal includes</p>

	<p><i>proposed development at this site could potentially have a minor negative impact on site end users' access to bus services.</i></p> <p>Railway Station: <i>Site GNLP2168 is located wholly or partially outside the target distance to Wymondham Railway Station or Spooner Row Railway Station and therefore, the proposed development at this site could potentially have a minor negative impact on site end users' access to rail services.</i></p> <p>Pedestrian Access: <i>Site GNLP2168 currently has poor access to the surrounding footpath network. The proposed development at this site could potentially have a minor negative impact on local accessibility.</i></p> <p>Road Network: <i>Site GNLP2168 is well connected to the existing road network. The proposed development at this site would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.</i></p>			<p>significant improvements over the current situation. Taking each criteria in turn:</p> <ul style="list-style-type: none"> • Extensions to existing bus services and new bus stops will be provided within the development, providing regular services to key destinations within Wymondham and the GNLP area. Therefore, the proposed development at this site would have a positive minor impact on site end users' access to bus services. • Accessibility, both pedestrian/cycle and vehicular, to Wymondham Railway Station and Spooner Row Railway Station would be improved as part of the delivery of the proposed GV. Therefore, the proposed development at this site could potentially have a minor positive impact on site end users' access to rail services. • Pedestrian priority and access within, across and beyond the GV site to the wider area has been incorporated into the masterplanning of SGV (see Illustrative Master Plan and Connectivity Plans for details). Therefore, the proposed development at this site could potentially have a minor positive impact on local accessibility; • We concur with the assessment in relation to road access. <p>On this basis, we suggest that the overall score against this objective should be 'minor positive' (as a minimum).</p>
<p>13. Historic Environment</p>	<p>Grade II Listed Buildings: Site GNLP2168 is located adjacent to 'Mariner's Inn', approximately 40m from 'Silfield Old Hall', 100m from 'Ivy</p>	<p>-</p>	<p>0</p>	<p>No Listed Buildings lie within the site. The setting of the Listed Buildings within the vicinity of the site boundary has already been carefully considered and mitigated through the masterplanning of the GV,</p>

	<p>Cottage' and within viewable distance from several other Listed Buildings in the surrounding countryside. The proposed development at this site could potentially alter the setting of these Listed Buildings, and therefore, a minor negative impact on the local historic environment would be expected.</p>			<p>including buffers and offsets to minimise any impact. Therefore, it is considered that a score of 'negligible impact' on the local historic environment would be more appropriate.</p>
<p>14. Natural resources, waste & contaminated land</p>	<p>Waste: Sites GNLP0006, GNLP0515, GNLP0525R, GNLP1055 and GNLP2168 are proposed for the development of 621 dwellings or more, and therefore, would be expected to increase household waste production by more than 1% in comparison to current levels in South Norfolk. The proposed development at these five sites could potentially result in a major negative impact on waste generation.</p>	<p>--</p>	<p>0</p>	<p>Taking each criteria in turn:</p> <p>Waste As with carbon emissions, the SA also appears to assume that the impact of any new development on waste generation increases exponentially with scale. This approach is flawed.</p> <p>Increasing the scale of impact simply by virtue of site size is not a robust approach; indeed, the opportunities for on-site recycling facilities, and particularly reducing construction waste, increase with the scale of development proposed.</p> <p>Furthermore, as with SA1, the SGV site appears to have been assessed cumulatively with 4 other unrelated sites. This is in contrast to the approach elsewhere (for example for the sites which together make up the Honingham Thorpe New Settlement proposal) where these sites have been assessed separately and have received varying SA outcomes.</p> <p>Depending on the size of individual homes, all new development will create an equal volume of waste on a per household basis, and that the total waste generated depends on the total number of new homes allocated, not where they are located.</p> <p>As such, it is questioned whether this is a valid SA criteria per se. However, if it is decided to be retained, then all development sites should score equally as 'negligible'.</p>

	<p>Previously Developed Land: Site GNLP2168 would be likely to result in a major negative impact on natural resources due to the loss of 20ha or more of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.</p> <p>ALC: Site GNLP2168 is situated on ALC Grades 2 and 3 land. ALC Grades 2 and 3 are considered to be some of Greater Norwich's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site due to the loss of this important natural resource.</p>			<p>Greenfield/PDL It is inevitable that a proportion of land that has not been previously developed will need to be released in order to meet the level of growth required within the GNLP. Whilst the relative proportions of greenfield to brownfield land is a legitimate SA consideration, we suggest varying the severity of impact simply according to greenfield site size is flawed, and would mean that greenfield strategic sites – which often have better sustainability credentials and outcomes than smaller dispersed greenfield development sites – are disproportionately negatively scored.</p> <p>ALC Although we concur with the assessment score in relation to impact on agricultural land, it should be noted that the SGV site is predominantly Grade 3 (see ALC report submitted with these representations).</p> <p>Given the above, it is suggested that the SGV proposal should score as 'negligible' for this SA objective.</p>
<p>15. Water</p>	<p>SPZ: Site GNLP2168 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.</p> <p>Watercourse: Site GNLP2168 coincides with Bays River. The proposed development at this site could potentially increase the risk of contamination of</p>	-	0	<p>Whilst infiltration is not considered to be likely at the site due to its underlying geology, the protection of the underlying groundwater and aquifer will need to be considered at the design stage. It is envisaged therefore that the treatment of the surface water generated through the development will be managed in accordance with the SuDS Manual Simple Index approach.</p> <p>Similarly, as with any new development, measures will have to be put in place through planning and EA consents to ensure that the risk of watercourse contamination is prevented.</p>

	these watercourses, and therefore, a minor negative impact would be expected.			In this context, it is considered that the SGV proposal should score as 'negligible' for this SA objective.
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Part 2 - the SA site assessment for the three new settlement proposals (Silfield Garden Village; West of Hethel; and Honingham Thorpe)

Notwithstanding the Sustainability Appraisal (SA) critique presented above, we have compared the SA site assessment scores given for each of the three new settlement proposals and are of the view this demonstrates inconsistencies and inaccuracies with the SA site assessment scores given. Table 2 below sets out the SA site assessment comparison between the three new settlement proposals.

As mentioned above, an inconsistent approach has been adopted with regard to the assessment of new settlement sites. Unlike Hethel or Silfield, the SA site assessment score for Honingham Thorpe (GNLP0415) is presented across individual parcels. DLA have procedural concerns regarding this and are set out at *paragraphs 3.19 – 3.26* within the GNLP Sites Document representation. These comments apply in the context of the SA assessment also.

Table 2: SA site assessment comparison of the three new settlements

SA Objective	Silfield Garden Village	West of Hethel	Honingham Thorpe				
	GNLP2168 SA Score	GNLP1055 SA Score	GNLP0415 Parcel A SA Score	GNLP0415 Parcel B SA Score	GNLP0415 Parcel C SA Score	GNLP0415 Parcel D SA Score	GNLP0415 Parcel G SA Score
1. Air Quality & Noise	--	--	--	--	--	--	--
2. Climate Change & Mitigation	--	--	--	-	+	--	-
3. Biodiversity, Geodiversity & GI	-	--	-	-	-	-	-
4. Landscape	-	-	-	-	-	-	-
5. Housing	++	++	++	0	0	++	++
6. Population & Communities	+	+	-	-	-	-	-
7. Deprivation	0	0	0	0	0	0	0
8. Health	--	--	--	--	--	--	--
9. Crime	0	0	0	0	0	0	0
10. Education	+	+	--	0	0	--	--
11. Economy	+	++	+	++	++	+	-
12. Transport & Access to Services	-	-	-	-	-	-	-
13. Historic Environment	-	-	-	-	-	-	-

14. Natural resources, waste & contaminated land	--	--	--	-	--	--	-
15. Water	-	-	-	-	-	-	-

SA Comparison of New Settlement Options

SA Objective 2: Climate Change & Mitigation

The three new settlement sites score 'Major Negative' for this SA objective. We have commented above about the failure of the SA to assess reasonable alternatives in respect of Policy 1 and the spatial strategy (on the grounds that new settlements offer a more sustainable spatial response to meeting growth needs than dispersed development sites). We have also commented on the flawed assessment of large scale sites under SA1 above.

In considering the relative merits of the new settlement options, it should be noted that SGV is committed to delivering a net zero carbon development (see technical submissions made in support of these representations for details of how this is to be achieved). This is a commitment not made by the other new settlement proposals. Taking this into account, not only do the measures embedded in the SGV proposal align most closely with the GNDP's wider plan objectives, but they will result in a more positive SA score for SGV. We would expect this to be taken into account in the updated SA which accompanies further iterations of plan-making including the Regulation 19 plan.

SA Objective 8: Health

The three new settlement sites score 'Major Negative' for this SA objective. All three new settlement proposals would provide the critical mass for both new healthcare and leisure on-site facilities and as such should be considered more favourably in this regard. More specifically, both healthcare and leisure facilities will be provided as part of the mix of community uses on-site as part of the SGV proposal.

In considering the relative merits of the new settlement options, it should be noted that SGV has the closest relationship to existing healthcare and leisure facilities (at Wymondham). As such, SGV has the greatest potential to establish a comprehensive health and leisure offer comprising both on-site provision and a close complementary functional relationship with existing facilities. As such, we consider that SGV presents the best opportunity for supporting existing facilities and providing new health and leisure facilities and should score relatively higher than the other new settlement options against this SA objective.

SA Objective 11: Economy

Honingham Thorpe (GNLP0415) score for this SA objective ranges from 'Minor Negative' to 'Major Positive' given the individual parcel assessment of this new settlement proposal. We reiterate our previous concerns regarding the approach to this assessment and request that GDNP review this and present the SA site assessment in a consistent format for all new settlement options.

The West of Hethel (GNLP1055) new settlement proposal scores 'Major Positive' for this SA objective. We do not disagree with this score, but in this context consider that SGV (GNLP2168) should also score 'Major Positive' for the reasons outlined in the table above.

SA Objective 12: Transport & Access to Services

All the new settlement options score 'Minor Negative' when assessed against Transport & Access to Services. We strongly disagree with this assessment and consider that the SA is seriously flawed in this respect.

When transport and access to services of the sites are directly compared, it is evident that the West of Hethel (GNLP1055) new settlement option has only one main access route onto the A11 via the B1135; is a completely isolated garden village; does not include or demonstrate suitable or deliverable access into Wymondham Town Centre or Rail Station on foot or by cycle; and there are no existing public transport services close to the site.

The Honingham Thorpe (GNLP0415) new settlement proposal has no proximity to rail, either existing or proposed. There is no access to a rail station or line within the vicinity of the site; it has no existing adequate pedestrian or cycle connections to other places; there is only one bus service of any frequency; and it is dependent on the completion of the Norwich Eastern Link to avoid unacceptable pressures on existing roads in the Wensum valley area.

By comparison, the SGV (GNLP2168) new settlement proposal has direct access from the A11, a number of direct existing accesses to Wymondham Town Centre and rail station and because of this proximity, proposes a comprehensive sustainable transport strategy focused on sustainable and active travel, pedestrian/cycle accessibility and access/support for public transport initiatives (including the potential to support BRT).

On this basis, we strongly contend that in respect of Transport and Access to Services, SGV should score more favourably than other new settlement options. Notwithstanding the procedural concerns already eluded to with assessing Honingham Thorpe as individual parcels, these parcels should have scored lower for this SA Objective given that their transport and access to services would be co-dependent on the other parcels coming forward in the appropriate manner.

SA Objective 13: Historic Environment

All new settlement proposals score 'Minor Negative' against the Historic Environment SA objective. We have serious reservations as to the soundness of this score. The West of Hethel (GNLP1055) new settlement proposal boundary surrounds Stanfield Hall (Grade II* Listed) and 'Bridge across moat to east of Stanfield Hall' (Grade II Listed) on all sides. In comparison, no listed buildings or assets are contained within the SGV new settlement proposal.



As such, we fail to understand why the scores do not differentiate in terms of severity of impact when clearly there are material differences in potential impact on the historic environment between the new settlement options.

Conclusions

Part 1 of these representations have identified significant concerns regarding the SA Site Assessment proforma completion for the SGV proposal and provided requested changes in relation to this. Without the suggested changes we have reservations as to the soundness of the evidence base for the GNLP and its likely success in achieving a successful outcome through the examination process.

Part 2 of these representations have highlighted inconsistencies with the approach to the SA site assessment matrices for the new settlement options. Having undertaken a detailed comparative review we consider that the SGV should have scored more favourably when compared with other new settlement options.

We suggest that the approach, methodology and the scoring within the SA is reviewed and updated in the period between this current consultation and the next scheduled consultation period (Regulation 19) in January/February 2021. Without making the suggested changes and review the SA fails to provide a sound and justified evidence base for the GNLP.