

Sustainability Appraisal and Strategic Environmental Assessment of the GNLP (Regulation 19 – March 2021)

Representations on behalf of Orbit Homes

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1.0 Introduction

- 1.1 The following representation is made by David Lock Associates (DLA) on behalf of Orbit Homes, *hereinafter referred to as Orbit*, in response to the Pre-Submission (Regulation 19) consultation on the Greater Norwich Local Plan 2018 – 2038. Orbit is the promoter of the Silfield Garden Village, a mixed-use development proposal for circa 6,500 homes south of Wymondham. Orbit has been actively engaged in the plan-making process of the GNLP, most recently submitting representations to the Regulation 18c consultation in March 2020.
- 1.2 This representation relates to the Regulation 19 Sustainability Report (Jan 2021) (*'Regulation 19 SA'*) which forms part of 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 Housing and Economic Land Availability Assessment Addendum III.

2.0 SILFIELD GARDEN VILLAGE PROMOTION BACKGROUND

- 2.1 DLA on behalf of Orbit, submitted representations to the Regulation 18c consultation (March 2020) which provided extensive comments on the draft GNLP and evidence base. The representations also provided a suite of technical information with regards to the development of the SGV site.
- 2.2 The Regulation 18c consultation representations (March 2020) also highlighted that a number of sites related to the current SGV proposal area have been promoted on behalf of the landowner in previous GNLP consultations for large scale development. The Regulation 18c consultation representations suggested the various sites previously submitted under separate representations are consolidated into a single site promotion as SGV (*See overleaf, reproduced from the March 2020 representations*).
- 2.3 During Summer 2020 DLA, on behalf of Orbit, liaised with GNLP officers to consolidate the sites referenced in the March 2020 representations and ensure the site boundary for the GNLP Sites Map was accurate. The consolidated site promotion was given the new site reference **GNLP4057A**, which includes 6,500 residential dwellings, local green infrastructure, education provision, employment etc. (see Silfield Garden Village Prospectus, September 2019 – submitted as part of the Regulation 18c consultation representations) and represents the core SGV proposal. The revised site promotion (GNLP4057A) was subject to a revised assessment within the Regulation 19 SA assessment which is the subject of this representation, Orbit support this approach and are of the view this represents a sound approach to plan-making.
- 2.4 Through this liaison DLA also clarified that Orbit are promoting additional land to the south of the SGV proposal boundary (Site Reference: GNLP4057A) for additional green infrastructure, circa 68.66 ha (Site Reference: GNLP4057B) and for a solar farm, circa 54.91ha (Site Reference: GNLP4057C). The proposed additional green infrastructure and solar farm are ancillary to the core SGV proposal as additional benefits but are not necessary to make the core development acceptable or policy compliant. Therefore, Orbit support the individual assessment of the additional green infrastructure (Site Reference: GNLP4057B) and solar farm (Site Reference: GNLP4057C) promotions.
- 2.5 Notwithstanding the above, Orbit are of the view that the Regulation 19 SA incorrectly assesses the SGV (Site Reference: GNLP4057A) against some of the sustainability objectives and the SA could benefit from an expanded assessment of the new settlement proposals which is outlined in Sections 3 & 4 below.

Reproduced from DLA Covering Letter dated 16th March 2020

Site Ref (HELAA/SEA)	Name	Site Use	Area (ha)	No of Dwgs
GNLP reference 2168	Park Farm, Silfield	Residential (new settlement)	340.28	6,500
GNLP reference 0515	Land at South Wymondham. North of A11 and West of Park Lane	Residential, Community, open space and GI	112.90	1,500
GNLP reference 0402	Land to the north-east of Silfield Road, and south of the A11	Residential, infrastructure, community uses and open space	26.87	800
GNLP reference 0403	Land to the south-west of Silfield Road, and south of the A11	Residential, infrastructure, community uses and open space	13.30	400

3.0 SILFIELD GARDEN VILLAGE SA SITE ASSESSMENT

- 3.1 The representations submitted by DLA, on behalf of Orbit, to the Regulation 18c consultation representations in March 2020 included comments on the Sustainability Appraisal and Strategic Environmental Assessment (January 2020) ('Regulation 18c SA') which set out our commentary on the Regulation 18c SA assessment undertaken for the SGV proposal - *Site Reference: GNNP 2168 in the January 2020 SA which has since changed to GNNP4057 to reflect the consolidated proposal, as explained in Section 2 above.*
- 3.2 The representations included Table 1 which set out where an alternative score should be given against each of the SA objectives for the SGV proposal, and the reason for this change. DLA are pleased that the Regulation 19 SA has reflected the majority of our comments made in relation to most of the SA objectives and support these changes. Nevertheless, the Regulation 19 SA does not accurately assess the SGV proposal against all the SA objectives and table 1 below suggests where an alternative score should be given and cross references back to the comments made on the Regulation 18c SA through the Regulation 18c consultation which remain applicable.

Table 1: Suggested Adjustment to SA Site Assessment – SGV (GNNP Site Ref: GNNP4057A)

SA Objective: Criteria	GNNP2168 SA Score Jan 2020	GNNP4057A SA Score Jan 2021 (Post Mitigation)	Suggested Adjusted SA score (Post Mitigation)	Reason for Suggested Adjusted Score
1. Air Quality & Noise	--	-	0	<i>Comments made in relation to the Regulation 18c consultation remain applicable – see page 4 of the Sustainability Appraisal and Strategic Environmental Assessment of the GNNP (Regulation 18 (C) - January 2020) representation (submitted March 2020).</i>
2. Climate Change & Mitigation	--	--	++	<i>Comments made in relation to the Regulation 18c consultation remain applicable - see pages 5 - 6 of the Sustainability Appraisal and Strategic Environmental Assessment of the GNNP (Regulation 18 (C) - January 2020) representation (submitted March 2020).</i>
3. Biodiversity, Geodiversity & GI	-	0	+	<i>Orbit supports the revised GNNP score for this SA objective, but comments made in relation to the Regulation 18c consultation remain applicable - see page 7 of the Sustainability Appraisal and Strategic Environmental Assessment of the GNNP (Regulation 18 (C) - January 2020) representation (submitted March 2020).</i>

SA Objective: Criteria	GNLP2168 SA Score Jan 2020	GNLP4057A SA Score Jan 2021 (Post Mitigation)	Suggested Adjusted SA score (Post Mitigation)	Reason for Suggested Adjusted Score
4. Landscape	-	-	-	<i>Unchanged</i> NB. The technical baseline report on Landscape submitted to accompany the Regulation 18c 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.
5. Housing	++	++	++	<i>Unchanged</i>
6. Population & Communities	+	+	+	<i>Unchanged</i>
7. Deprivation	0	+	+	<i>Unchanged</i>
8. Health	--	-	+	<i>Comments made in relation to the Regulation 18c consultation remain applicable - see pages 9 - 11 of the Sustainability Appraisal and Strategic Environmental Assessment of the GNLP (Regulation 18 (C) - January 2020) representation (submitted March 2020).</i>
9. Crime	0	+	+	Orbit supports and agree with the increase for this SA objective.
10. Education	+	+	+	<i>Unchanged</i>
11. Economy	+	++	++	Orbit supports and agree with the increase for this SA objective.
12. Transport & Access to Services	-	+	+	Orbit supports and agree with the increase for this SA objective.
13. Historic Environment	-	0	0	Orbit supports and agree with the increase for this SA objective.

SA Objective: Criteria	GNLP2168 SA Score Jan 2020	GNLP4057A SA Score Jan 2021 (Post Mitigation)	Suggested Adjusted SA score (Post Mitigation)	Reason for Suggested Adjusted Score
14. Natural resources, waste & contaminated land	--	-	0	<i>Comments made in relation to the Regulation 18c consultation remain applicable - see pages 14 - 15 of the Sustainability Appraisal and Strategic Environmental Assessment of the GNLP (Regulation 18 (C) - January 2020) representation (submitted March 2020).</i>
15. Water	-	-	0	<i>Comments made in relation to the Regulation 18c consultation remain applicable - see pages 15 - 16 of the Sustainability Appraisal and Strategic Environmental Assessment of the GNLP (Regulation 18 (C) - January 2020) representation (submitted March 2020).</i>

4.0 NEW SETTLEMENT PROPOSALS SA SITE APPRAISALS

- 4.1 Notwithstanding the Regulation 19 SA critique presented above, we have compared the Regulation 19 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. This is an approach we employed in the previous representations made to the Regulation 18c consultation - *see pages 17 - 18 of the Sustainability Appraisal and Strategic Environmental Assessment of the GNLP (Regulation 18 (C) - January 2020) representation (submitted March 2020).*
- 4.2 As mentioned above, an inconsistent approach has been adopted with regard to the assessment of new settlement sites. Unlike Hethel or Silfield, the Regulation 19 SA site assessment score for the revised Honingham Thorpe proposal (GNLP0415R) is presented across individual parcels. DLA previously raised procedural concerns regarding this approach, as set out at *paragraphs 3.19 - 3.26 within the GNLP Sites Document representation (March 2020) - we wish to reiterate these comments which remain applicable and should be addressed prior to submission.*

Table 2: SA site assessment comparison of the three new settlement proposals

SA Objective	Silfield Garden Village	West of Hethel	Honingham Thorpe (Multiple parcels)				
	GNLP4057A SA Score (Jan 2021 - Post Mitigation)	GNLP1055R SA Score (Jan 2021 - Post Mitigation)	GNLP0415R Parcel A SA Score (Jan 2021 - Post Mitigation)	GNLP0415R Parcel B SA Score (Jan 2021 - Post Mitigation)	GNLP0415R Parcel C SA Score (Jan 2021 - Post Mitigation)	GNLP0415R Parcel D SA Score (Jan 2021 - Post Mitigation)	GNLP0415R Parcel G SA Score (Jan 2021 - Post Mitigation)
1. Air Quality & Noise	-	-	-	-	-	-	-
2. Climate Change & Mitigation	--	--	-	+	+	-	-
3. Biodiversity, Geodiversity & GI	0	-	-	-	-	-	-
4. Landscape	-	-	-	-	-	-	-
5. Housing	++	++	++	0	0	++	++

SA Objective	Silfield Garden Village	West of Hethel	Honingham Thorpe (Multiple parcels)				
	GNLP4057A SA Score (Jan 2021 – Post Mitigation)	GNLP1055R SA Score (Jan 2021 – Post Mitigation)	GNLP0415R Parcel A SA Score (Jan 2021 – Post Mitigation)	GNLP0415R Parcel B SA Score (Jan 2021 – Post Mitigation)	GNLP0415R Parcel C SA Score (Jan 2021 – Post Mitigation)	GNLP0415R Parcel D SA Score (Jan 2021 – Post Mitigation)	GNLP0415R Parcel G SA Score (Jan 2021 – Post Mitigation)
6. Population & Communities	+	+	0	0	0	0	0
7. Deprivation	+	+	+	+	+	+	+
8. Health	-	-	--	--	--	--	--
9. Crime	+	+	+	+	+	+	+
10. Education	+	+	-	0	0	-	-
11. Economy	++	+	+	++	++	+	0
12. Transport & Access to Services	+	+	-	-	-	-	-
13. Historic Environment	0	0	0	0	0	0	0
14. Natural resources, waste & contaminated land	-	-	-	-	-	-	-
15. Water	-	-	0	0	0	0	0

**GNLP0415R-E & GNLP0415R-F not included in the above table as they do not include any development but are proposed for a Country Park and Nature Reserve respectfully.*

4.3 Table 3 below consolidates the scores for Honingham Thorpe development parcels A, B, C, D & G and compares this against the Silfield and Hethel new settlement proposals, to demonstrate our procedural concerns.

Table 3: SA site assessment comparison of the three new settlement proposals - Honingham Thorpe (Consolidated score)

SA Objective	Silfield Garden Village	West of Hethel	Honingham Thorpe (Suggested consolidated score)	
	GNLP4057A SA Score (Jan 2021 – Post Mitigation)	GNLP1055R SA Score (Jan 2021 – Post Mitigation)	Honingham Thorpe (Suggested consolidated score) (Jan 2021 – Post Mitigation)	
1. Air Quality & Noise	-	-	-	
2. Climate Change & Mitigation	--	--	--	
3. Biodiversity, Geodiversity & GI	0	-	-	
4. Landscape	-	-	-	
5. Housing	++	++	+	
6. Population & Communities	+	+	0	
7. Deprivation	+	+	+	
8. Health	-	-	--	
9. Crime	+	+	+	
10. Education	+	+	-	0
11. Economy	++	+	+	
12. Transport & Access to Services	+	+	-	
13. Historic Environment	0	0	0	
14. Natural resources, waste & contaminated land	-	-	-	
15. Water	-	-	0	

- 4.4 More broadly, we support the approach taken to separately assess the additional land promoted by Orbit for additional green infrastructure and a solar farm within the Regulation 19 SA as this is an additional benefit to the core SGV proposal and are not required to make SGV acceptable or policy compliant. To this regard, notwithstanding the comments made above, we support the approach taken to separately assess Honingham Thorpe parcels GNLP0415R-E & GNLP0415R-F, promoted for a Country Park and Nature Reserve respectfully, as this is consistent with the approach taken with SGV.
- 4.5 However, that is based on the understand that Honingham Thorpe parcels GNLP0415R-E & GNLP0415R-F are additional benefits and not required to make the Honingham Thorpe new settlement proposal acceptable or policy compliant. If Honingham Thorpe parcels GNLP0415R-E & GNLP0415R-F are required to make Honingham Thorpe new settlement proposal acceptable or policy compliant then the SA assessment for these parcels should be consolidated within the overall SA assessment for the Honingham Thorpe new settlement.
- 4.6 Table 4 below compares the Regulation 19 SA of the additional green infrastructure (Site Reference: GNLP4057B) and solar farm (Site Reference: GNLP4057C) promoted as an ancillary benefit to the core SGV proposal against Honingham Thorpe parcels GNLP0415R-E & GNLP0415R-F, promoted for a Country Park and Nature Reserve respectfully.

Table 4: SA site assessment comparison of SGV additional benefits & Honingham Thorpe (country park & nature reserve)

SA Objective	Silfield Garden Village		Honingham Thorpe (Multiple parcels)	
	GNLP4057B (Green Infrastructure) SA Score	GNLP4057C (Solar Farm) SA Score	GNLP0415R-E (Country Park) SA Score	GNLP0415R-F (Nature Reserve) SA Score
	(Jan 2021 – Post Mitigation)	(Jan 2021 – Post Mitigation)	(Jan 2021 – Post Mitigation)	(Jan 2021 – Post Mitigation)
1. Air Quality & Noise	0	0	0	0
2. Climate Change & Mitigation	+	+	0	0
3. Biodiversity, Geodiversity & GI	0	0	+	+
4. Landscape	+	-	+	+

SA Objective	Silfield Garden Village		Honingham Thorpe (Multiple parcels)	
	GNLP4057B (Green Infrastructure) SA Score	GNLP4057C (Solar Farm) SA Score	GNLP0415R-E (Country Park) SA Score	GNLP0415R-F (Nature Reserve) SA Score
	(Jan 2021 – Post Mitigation)	(Jan 2021 – Post Mitigation)	(Jan 2021 – Post Mitigation)	(Jan 2021 – Post Mitigation)
5. Housing	0	0	0	0
6. Population & Communities	0	0	0	0
7. Deprivation	+	+	0	0
8. Health	+	0	+	+
9. Crime	+	+	0	0
10. Education	0	0	0	0
11. Economy	0	0	0	0
12. Transport & Access to Services	0	0	0	0
13. Historic Environment	0	0	0	0
14. Natural resources, waste & contaminated land	0	-	0	0
15. Water	0	0	0	0

The findings of Table 4 are subject to the comments made in paragraph 4.5.

SA Comparison of New Settlement Options

SA Objective 2: Climate Change & Mitigation

- 4.7 SA Objective 2 (Climate Change Mitigation and Adaptation) assesses three sub-objectives carbon emissions, fluvial flooding, and pluvial flooding. The assessment of carbon emission assumes the increase greenhouse gas (GHG) emissions caused by new residents is associated with impacts of the construction phase, the occupation and operation of homes and businesses, oil, gas, and coal consumption and increases in local road transport with associated emissions. Therefore, the greater number of proposed dwellings the worse a development proposal is likely to score for this SA objective. The assessment of fluvial flooding and pluvial flooding is based upon the area of the extent of area in areas at risk of flooding.
- 4.8 The approach to assessing carbon emissions highlights our concerns that the Regulation 19 SA (as well as the Regulation 18c SA) inconsistently assesses the Honingham Thorpe in comparison to Hethel and Silfield. Paragraph B.15.2.1 of the Regulation 18c SA (but not updated within the Regulation 19 SA) reads:
- "Carbon Emissions: Site GNLP0415R-G is proposed for the development of 266 dwellings. The proposed development at this site could potentially increase local carbon emissions, as a proportion of Broadland's total, by more than 0.1%. Therefore, a minor negative impact on Broadland's carbon emissions would be expected. Sites GNLP0415R-D and GNLP0415R-A are proposed for the development of 601 dwellings or more. The proposed development at these two sites could potentially increase local carbon emissions, as a proportion of Broadland's total, by more than 1%. Therefore, a major negative impact would be expected."*
- 4.9 It is clear from the above that some of the parcels of the Honingham Thorpe have been assessed more favourably against SA Objective 2 as the level of proposed housing across each individual parcel varies. In comparison Silfield and Hethel score 'major negative effect' for this SA objective partly due to the higher quantum of proposed residential dwellings (fluvial flooding and pluvial flooding contribute to the SA objective score also, as outlined above).
- 4.10 Not only that but some of the Honingham Thorpe parcels have scored more positively for this SA objective in the Regulation 19 SA compared with the Regulation 18c SA (see table 5 below), whilst this is not uncommon, we are concerned that the reason for a more positive score is not explained or recorded. We suggest this, along with the consolidation of the SA scores for Honingham Thorpe needs to be correct prior to the submission.
- 4.11 Notwithstanding the above, we wish to reiterate comments made during the Regulation 18c consultation. SGV is committed to delivering a net zero carbon development (see technical submissions made in support of the Regulation 18 c 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 for SA Objective 2.

Table 5: Honingham Thorpe SA Objective 2 SA Comparison

Site Reference	Sustainability Appraisal and Strategic Environmental Assessment (January 2020) ('Regulation 18c SA') SA Score	Regulation 19 Sustainability Report (Jan 2021) ('Regulation 19 SA') SA Score
GNLP0415R-A	--	-
GNLP0415R-B	--	+
GNLP0415R-C	--	+
GNLP0415R-D	--	-
GNLP0415R-G	--	-

An alternative SA Assessment for New Settlement Proposals

- 4.12 We are of the view that subject to addressing the comments raised above the SA represents a sound approach to plan-making. However, it does not represent the most effective way in which to assess the sustainability credentials of new settlement proposals which are distinctively unique, more complex and require a broader level of thinking than more traditional 'bolt-on' development proposals.
- 4.13 We suggest future iterations of the SA could assess the new settlement proposals in two parts. The first part can retain the traditional SA site assessment, which we have commented on above. The second part could assess the new settlement proposals against a more bespoke SA objective criteria which looks at the wider impacts and benefits of the new settlement proposal such as: location (example sub-criteria could include transport, access to rail, support for existing town centres, access to or inclusion of employment opportunities etc.); ability to protect, enhance and integrate existing green infrastructure; ability to protect against inappropriate development elsewhere (i.e., prevent the need for further piecemeal 'edge development'); and on-site education/community facilities provision.
- 4.14 It is acknowledged that the GNLP is at an advanced stage in the plan-preparation process. However, this 2-part assessment process could form part of the new settlement preparation work that is required as part of draft Policy 7.6 and be completed prior to the examination of the GNLP. We suggest that in order to demonstrate commitment to this analysis and assessment work and to give some formal policy status to this commitment, a reference to the further NS assessment should be included as part of an updated draft policy wording for Policy 7.6.

5.0 POLICY 7.6 SA ASSESSMENT

- 5.1 We strongly support the inclusion of draft Policy 7.6 – please see paragraphs 3.104 – 3.151 of our representations of the GNLP Strategy Document for further details.
- 5.2 We also support the SA assessment of this draft policy within the Regulation 19 SA as this represents a sound approach to plan-making. We acknowledge that the draft policy is broad at this stage and as such the level of detail to assess has been reflected within the SA assessment. Nevertheless, we are of the view the Regulation 19 SA undervalues the sustainability credentials of new settlement proposals with regards to the transport & access to services SA objective. Table 6 below suggests where an alternative score should be given, and the reason for this change:

Table 6: Suggested Adjustment to SA Policy 7.6 Assessment

SA Objective	Policy 7.6 – Preparing for New Settlements	Suggested Adjusted SA score	Reason for Suggested Adjusted Score
1. Air Quality & Noise	-	-	
2. Climate Change & Mitigation	-	-	
3. Biodiversity, Geodiversity & GI	-	-	
4. Landscape	-	-	
5. Housing	++	++	
6. Population & Communities	+	+	
7. Deprivation	+	+	
8. Health	+	+	
9. Crime	+	+	
10. Education	++	++	
11. Economy	++	++	
12. Transport & Access to Services	-	+	The scale of new settlement proposals offers a unique opportunity to support a significant shift to more sustainable pattern of movement through the co-location of housing and employment opportunities along with the integration of attractive and efficient active travel links.

				<p>The scale of new settlement proposals can also attract a greater contribution to, or the provision of new, public transport which in turn can reduce the impact on the existing transport network.</p> <p>In summary, the scale of new settlement development offers a greater opportunity to achieve more sustainable patterns of development in comparison to piecemeal or small-scale allocations.</p>
13. Historic Environment	-		-	
14. Natural resources, waste & contaminated land	-		-	
15. Water	-		-	

6.0 SUMMARY & CONCLUSIONS

- 6.1 The consolidation of the SGV proposal was given the revised site reference GNLP4057A which includes 6,500 residential dwellings, local green infrastructure, education provision, employment etc. (see Silfield Garden Village Prospectus, September 2019 – submitted as part of the Regulation 18c consultation representations) and represents the core SGV proposal. The additional green infrastructure (Site Reference: GNLP4057B) and solar farm (Site Reference: GNLP4057C) promoted by Orbit as an additional benefit to the SGV core proposal have been assessed independently of one another within the Regulation 19 SA. Orbit support this method and consider this represents a sound approach to plan-making.
- 6.2 We are pleased that the Regulation 19 SA site assessment of the core SGV proposal reflects some of the comment Orbit made on the Regulation 18c consultation and support these changes. Nevertheless, we are of the view that the Regulation 19 SA still scores the core SGV proposal incorrectly against some of the SA objectives. Table 1, above, sets out where an alternative score should be given against each of the SA objectives for the SGV proposal, and the reason for this change.
- 6.3 Table 2 presents a comparison of the SA site assessments for the three new settlement proposals (SGV, Hethel and Honingham Thorpe). In summary, table 2 highlights two significant considerations – (i) the inconsistent (piecemeal) approach taken with regard to Honingham Thorpe unfairly skews the SA site assessment score for some of the SA objectives, principally SA objective 2 (Climate Change & Mitigation); and (ii) SGV is the most sustainable development proposal of the three new settlement proposals.
- 6.4 We are of the view that subject to addressing the comments raised within these representations the Regulation 19 SA represents a sound approach to plan-making, but it does not represent the most effective way in which to assess the sustainability credentials of new settlement proposals. We suggest future iterations of the SA could assess the new settlement proposals in two parts: (1) The traditional SA Site Assessment; and (2) A more bespoke SA objective criteria which looks at the wider impacts and benefits of the new settlement proposal. It is acknowledged that the GNLP is at an advanced stage in the plan-preparation process. However, this 2-part assessment process could form part of the new settlement preparation work that is required as part of draft Policy 7.6, and that the wording of Policy 7.6 could be amended to include this requirement to ensure commitment to the workstream.
- 6.5 Finally, Orbit strongly support the inclusion of draft Policy 7.6 of the GNLP, *see paragraphs 3.104 – 3.151 of the GNLP Strategy representations*, but are of the view the Regulation 19 SA undervalues the sustainability credentials of new settlement proposals with regards to the transport & access to services SA objective.