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Dear Mr Burrell

Greater Norwich Local Plan Regulation 18 - Draft Strategy and Site Allocations 2018 - 2038, Sustainability Appraisal and Habitats Regulations Assessment

Thank you for consulting Natural England on the above in your email of 29 January 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We support Broadland District, Norwich City and South Norfolk Councils' preparation of a joint Local Plan to ensure a consistent approach to planning across the Greater Norwich area, with policies aligned with the revised National Planning Policy Framework (NPPF). We have made detailed comments in this letter in relation to the following Greater Norwich Local Plan (GNLP) consultation documents:

- Draft Local Plan – Part 1 The Strategy
- Draft Sites Document
- Habitats Regulations Assessment of GNLP, December 2019
- Sustainability Appraisal and Strategic Environmental Assessment, January 2020

Natural England acknowledges that the findings of supporting documents including the draft Greater Norwich Water Cycle Study (WCS) (AECOM 2019) and the emerging Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) will need to be incorporated in the policies of the Local Plan and supporting documents, once these are finalised.

To summarise our response briefly, we broadly welcome the progress and development of aspects of the Local Plan and supporting documents to date, though Natural England is not yet satisfied that the relevant Plan policies will provide sufficient mitigation to ensure that there will be no adverse impacts to designated sites alone, and in-combination, through changes in water quality and resources and in regard to recreational disturbance, and to demonstrate that policies are sustainable.

Comments on the Draft Greater Norwich Local Plan – Part 1 The Strategy

Greater Norwich Spatial Profile

Q5. Is there anything that you feel needs further explanation, clarification or reference?

Information provided under 'The natural environment' section needs to be improved and expanded as it currently is unclear or incomplete. It needs to recognise and include the issues that the natural environment, both within and adjoining the Plan area, is facing including biodiversity loss, climate change, habitat fragmentation, pollution etc and how the proposed Plan may impact on and address these issues. Currently, it could be read as the only issues facing our natural environment are those identified under (98), which is clearly not the case.

(97) Under (97) and throughout the Local Plan all references to 'Natura 2000 sites' should be replaced with 'European Sites' since Britain has left the European Union. It would be helpful to explain that in the National Planning Policy Framework (NPPF) these are referred to as 'habitats sites' as it is unclear from the text and *Map 4 Major Habitat Sites in Norfolk* nor are the abbreviations in the legend on the map explained. In addition to Map 4, a separate map (or series of maps) should be included which clearly illustrate the other natural environmental assets found **within or adjacent to** the GNLP area.

(98) This section needs to be expanded and made clearer with the impacts resulting from growth on water quality and water resources separated from recreational disturbance impacts. The Plan needs to recognise that recreational disturbance impacts affect not just internationally designated sites, but a wide range of other sites that are important for wildlife, including County Wildlife Sites (CWS).

(101) It needs to be clearly stated here that the existing green infrastructure (GI) network needs to be **protected from further loss and severance**, as well as new GI being created. Mention should also be made of the vital role of GI in:

- supporting biodiversity
- combating climate change
- reducing pollution
- helping to create attractive homes and places to work
- enhancing landscapes
- reducing flood risk, and
- contributing to wellbeing

The Plan needs to recognise that the protection and delivery of quality GI is key to delivering many of its objectives and growth cannot be regarded as being sustainable without this. In particular the Local Plan should promote the delivery of a strategic green infrastructure network that is resilient to the scale of development proposed, capable of protecting designated sites and supporting habitat, and delivering the wider range of environmental services to meet development needs.

Section 3 – The Vision and Objectives for Greater Norwich

Q6. Do you support or object to the vision and objectives for Greater Norwich?

Q7. Are there any factors which have not been covered that you believe should have been?

For the Local Plan to deliver actual sustainable development and significantly address climate change, the vision needs to be better balanced. Otherwise, the vision as set out in (109) - (111) appears to be heavily focussed on growth at the expense of the other two pillars of sustainable development.

In our response (dated 21 March 2018 ref:235617) to a previous consultation on the Local Plan, we considered that the vision would be improved by the inclusion of the following words under (110):

'... and ~~an~~ a **protected and** enhanced environment'.

We maintain that this wording is important to include as it sets the tone for the Local Plan and signals the commitment of the local authorities to safeguard their natural assets.

We also consider that under (110) the text should be amended as follows:

‘Growth will make the best of Greater Norwich’s distinct built, natural and historic assets **whilst protecting and enhancing them.’**

In relation to the Plan’s objectives, Natural England expects GI to feature prominently in the objectives as it has a crucial role in delivering the following objectives: economy, communities, homes, infrastructure and environment and as highlighted in our comments to (101) above. We strongly **recommend that the text is amended to reference GI** under each of the objective headings (112) – (134) as well as in the wording of these objectives as listed under (135).

We emphasised the role and importance of GI in the new Local Plan in our previous consultation response and would like to re-emphasise its importance in this response. Unless GI is given central prominence in the policies, which need to clearly explain in detail how and where GI will be delivered and the timescale for it, the Plan is unlikely to deliver sustainable development, or adaptation to the impacts of climate change, across the Greater Norwich area.

Section 4 – The Delivery of Growth and Addressing Climate Change

Q12. Do you support, object, or have any comments relating to the approach to the Climate Change Statement?

We welcome the Climate Change Statement and support the measures outlined in *Table 5 GNLP coverage of climate change issues* and recognition of the importance of GI in helping to achieve this. In addition to identifying which Plan policies support this issue, it would be useful to identify any aspects of policies which contribute to the opposite effect, and how these can be modified to help decarbonise future development, and therefore contribute to addressing climate change.

Section 5 – The Strategy

Policy 1 – The Sustainable Growth Strategy

Wording of Policy 1 - we have the following comments to make which do not fit within the questions asked (Q13-14), and also in response to:

Q17. Do you support, object or wish to comment on the approach to Infrastructure?

The current wording of the policy needs to be strengthened with regard to the environment and the delivery of GI. Currently it is rather vague and weak with regard to the essential role that quality GI must play if sustainable development is to be delivered under the Plan and meet the needs and aims as set out in the accompanying text under (144). The policy needs to cross reference Policy 3 in order to provide a strong and clear steer of what will be required to deliver the growth strategy whilst protecting and enhancing the area’s natural environmental assets, and to make the Plan sound. We recommend that the wording of the policy needs to be amended as follows (or a similar form of wording used):

“Sustainable development and inclusive growth are supported by...

- *supporting infrastructure will be provided in line with policies 2, **3** and 4;*
- *environmental protection and enhancement measures including further improvements to the green infrastructure network will be delivered **in line with policy 3.**”*

and:

“INFRASTRUCTURE

*The sustainable growth strategy will be supported by improvements to the transport system, green infrastructure and services. **Improvements to existing green infrastructure and the creation of new green infrastructure will be delivered in line with policy 3.***

Whilst we welcome recognition that new development must be supported by additional infrastructure of all kinds, in terms of GI, the reference to Appendix 1 is disappointing, given the complete absence of GI being mentioned in Appendix 1. The appendix is based on the findings of the undated Greater Norwich Local Plan Infrastructure Needs Report (GNLPINR). The GNLPINR make very limited reference to the provision of GI via a large scale map which shows strategic GI corridors and contains two sentences.

We strongly recommend that references to GI throughout the Plan should be made instead to the Greater Norwich Infrastructure Plan (dated July 2019). This document refers to GI in many sections, and in *Appendix A – Infrastructure Frameworks* includes a detailed list of the GI projects that will be delivered under the current Joint Core Strategy (JCS), and presumably rolled forward into the new Plan. Clearly, it will need to be updated due to the new development being proposed under this consultation. However, **more detailed information about the quality and quantity of GI together with where on the ground it will be delivered needs to be included** in the Plan.

Policy 2 – Sustainable Communities

Q18. Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability statement?

We welcome the production of *Table 8 – Key Issues addressed by policy 2* and agree with the issues covered.

In relation to issue 3. *Green infrastructure* it is appropriate for developments to be required to deliver GI off-site, or to financially contribute to this, where it is not possible to deliver quality GI which meets the needs of the inhabitants within that site. It would be useful to state here that **development is expected to avoid loss or severance of existing GI networks**, and to contribute to the **enhancement and extension of existing GI on-site** in order to strengthen these networks.

With regard to issue 9. *Water* the findings of the draft WCS should be referred to, and used to update the table text. A clear intention to adopt the higher standard for water of 110 litres per person per day needs to be stated in the policy. Mention is made of the need to retrofit existing housing and employment stock with water efficiency measures, which we support, and recommend that the Plan should contain a policy which supports this measure.

We support the production of a Sustainability Statement for major developments.

Q19. Do you support, object or have any comments relating to the specific requirements of the policy?

We warmly welcome and support this policy.

Under (3) we consider the provision of accessible GI for recreational uses should be included within the policy. This is necessary to help mitigate the impacts of additional recreational pressure from new housing development on designated sites.

Under (9) we endorse the adoption of the higher standard for water efficiency under the Building Regulations, which is also supported by evidence in the WCS. Reference to retrofitting existing buildings with water efficiency measures has also been identified as essential in the WCS in terms of managing water demand. We suggest it would be appropriate to include some wording in this policy which recognises this need, and supports its implementation should Government adopt this approach in future.

Policy 3 – Environmental Protection and Enhancement

The Natural Environment

Q21. Do you support, object or have any comments relating to the specific requirements of the policy?

Natural England **objects** to the current wording of Policy 3 and considers that the policy and supporting text are inadequate to protect, maintain, restore and enhance the natural environmental assets of the area and the benefits arising from these for residents, workers and visitors. It will not ensure the delivery of GI of sufficient quality and quantity in the right locations, nor help the Plan to meet the sustainability criteria or adapt to climate change. It contains too much uncertainty and needs to explain the hierarchies of site protection and mitigation.

The natural environmental assets found in the Greater Norwich area, and adjoining it, provide immense benefits that deliver across all three pillars of sustainability. In terms of benefits to the economy and society alone, these would run into tens of millions of pounds if they were calculated over the lifetime of the Plan.

We strongly recommend that Policy 3 and the supporting text are substantially amended and expanded. The 175 words assigned to the current natural environment section of Policy 3 cannot do justice to what is required for the Greater Norwich area and surroundings. Much of the wording and maps in *Policy 1: Addressing climate change and protecting environmental assets* in the current Joint Core Strategy (2011) remains valid and relevant. Parts of it could form the basis of a new Policy 3, which needs to cover measures in relation to climate change adaptation, halting and reversing the loss of biodiversity in relation to the Government's 25 year Environment Plan and Nature Recovery Networks, biodiversity net gain, recreational disturbance, suitable alternative greenspace (SANGS) and GI networks.

We also suggest looking at East Suffolk Council's *Local Plan Final Draft* and *Policy SCLP 10.1: Biodiversity and Geodiversity* and the supporting text in general, for the approach that we endorse (<https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>).

GI references in the Plan repeatedly refer to the strategic GI network as set out on the (basic) Map 8 and very little else. The Local Plan needs to provide a strategic document that sets out what the GI network will look like on the ground, how and where it will be delivered and the timescale, together with detailed information about the existing GI network and how it, too, will be protected, enhanced or expand. At this stage of the plan process there needs to be far more detail provided to be certain that it will be delivered, and for the HRA to be able to assess in relation to the mitigation measures that have been identified.

Natural England, together with other partners, would very much like to work with the local authorities in revising and expanding Policy 3 to ensure it is comprehensive and robust.

Policy 4 – Strategic Infrastructure

Q24. Do you support, object or have any comments relating to the approach to other strategic infrastructure (energy, water, health care, schools and green infrastructure)?

There are no specific references to GI in the supporting text or policy and we advise that this needs to change with due recognition and importance given. GI is essential for the delivery of sustainable development. Strategic infrastructure has been identified to meet economic and social imperatives but fails to identify any strategic infrastructure to meet environmental requirements. In the absence of the identification of strategic GI it is unclear how the Plan will deliver sustainable growth, or address the impacts of climate change. This needs to be addressed under the heading of '*Strategic Green Infrastructure*' both in the supporting text and within the policy wording.

The findings of the WSC may need to be reflected in the policy and supporting text.

Policy 6 – The Economy

Q35. Do you support, object or have any comments relating to the approach to tourism, leisure, environmental and cultural industries?

It would be helpful to recognise the benefits and contributions that multi-functional GI delivers to making places more attractive to employers & employees in the greater Norwich area, as well as the contributions that the county's natural environmental assets make to the Norfolk economy. It can be used to enhance the environment in the economic centres of settlements and help attract inward investment.

Under 5.in the policy, second bullet point, we suggest the **wording should be amended to include the protection, enhancement and expansion of the GI network**, rather than simply its implementation.

Policy 7 – Strategy for the Areas of Growth

Policy 7.1 – The Norwich Urban Area including fringe parishes

Policy 7.2 The Main Towns

Policy 7.3 The Key Service Centres

Policy 7.3 Village Clusters

In relation to the questions posed under this section (Q.38 –Q46), please refer to the comments that we have made above in our response to the Local Plan in relation to GI and policy 3 above, and our responses to the Draft GNLP Sites document and the HRA below.

All sites need to be located to minimise impacts on all natural environmental assets wherever possible, and where this cannot be avoided to mitigate, whether on or off-site, and then finally compensate. GI needs to be delivered at every opportunity in a coherent way, and taking into account its varied benefits including supporting biodiversity, providing opportunities for recreation, mitigating and adapting to climate change and enhancing landscape character.

Overarching Consultation Question

48. Do you support or object or wish to comment any other aspect of the draft plan not covered in other questions? This includes the appendices below and the evidence base on the web site. Please identify particular issues.

Please refer to our comments made in relation to Appendix 1 under Policy 1 and Q17 above.

Comments on the Draft GNLP Sites Document

Natural England has not commented on the individual preferred sites for new allocation nor on the reasonable alternative sites identified, due to the number of sites involved and limitations on our resources.

We previously responded to a consultation on new, revised and small sites (our letter dated 14 December 2018; our ref: 262820). Our advice made in that response remains relevant to this current consultation on the selection and allocation of sites under the GNLP, and needs to be considered fully.

Similarly, the advice provided in this letter regarding various Plan policies and the HRA needs to be incorporated into the policy and supporting text of each relevant individual site allocation policy, making it clear that the allocation will only be deliverable if a project level HRA can demonstrate no adverse effects. Any mitigation measures identified through the HRA or the emerging GIRAMS need to be included too.

Habitats Regulations Assessment Report

Natural England welcomes the production of the latest Habitats Regulations Assessment (HRA) report, dated December 2019, and prepared by The Landscape Partnership. We previously commented on the interim HRA in our response (dated 21 March 2018; our ref 235617) to the GNLP growth options and site proposals consultation.

Please note under 1.6.1 that the final sentence should refer to Natural Resources Wales rather than one of its predecessors, Countryside Council for Wales.

The designated sites have been identified correctly and we agree with the likely significant effects identified under 3.2.1. Under the second bullet point it would be good to amend the text as follows:

- “Increased pressure on water resources: The new homes **and businesses** would require a reliable source of drinking water...”.

This would recognise that water is essential for both new residential and employment allocations, as well as potentially being required in the operation of some businesses beyond the usual daily hygiene requirements.

As outlined in our response to the Local Plan above, Natural England has concerns whether the current wording and supporting text of various Plan policies are sufficient to secure the delivery of the mitigation measures identified in the HRA.

5.5 European sites potentially affected by recreational impacts

We strongly advise that this section of the HRA is re-examined in light of the findings of the GIRAMS. An in-depth analysis of the available data from the Footprint Ecology report, referred to under 5.5.1 of the HRA, has been undertaken as part of the GIRAMS. It has calculated separate Zones of Influence (ZoI) for recreational disturbance pressures for residents and for visitors for a number of European sites. Please refer to Table 2 in the draft GIRAMS report (dated February 2020) for further details (which should be available from Trevor Wiggett, Norfolk Strategic Planning Project Manager). The ZoI cover much greater distances for both residents and visitors than those referred to in the table under 5.5.1.

For a consistent standardised approach, the same dataset needs to be used for the assessment of all the policies in the GNLP. We advise that the draft GIRAMS is made available as soon as possible to the consultants who are undertaking the Local Plan’s HRA. This data was unavailable at the time the current HRA was produced. The ZoI will mean that the findings of the HRA will need to be re-examined thoroughly and revised accordingly, with implications for the wording of policies and supporting text with regard to mitigation.

5.10 Mitigation for potential impacts of *Policy 1 – The Growth Strategy*

We consider that the HRA needs to identify which plan policies would identify the three mitigation strands described under 5.10.4 and suggests new policy wording, or amendments to existing policies, to ensure the Plan delivers the mitigation. Whilst recognising that the findings of the emerging Norfolk-wide study, the Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS), will need to be reflected in the Local Plan regarding tariffs, Natural England does not consider the two other strands of suitable alternative natural green space (SANGS) and the implementation of a cohesive programme of GI improvements, have been covered adequately in the Plan to conclude that these will be delivered in a coherently and timely approach at the appropriate locations.

5.10.7 Air pollution

The proposed Norwich Western Link (NWL) road will pass within 200 m of the River Wensum Special Area of Conservation (SAC), and although the road is proposed by Norfolk County Council, it has been identified as necessary in order to support the future housing and employment growth in the Greater Norwich area. The Plan references the NWL, including under Policy 4 - Strategic Infrastructure, and the road should be considered in combination with the other proposals under

Policy 4 that have the potential to affect designated sites through increases in air pollution.

In addition, to examining the distance of proposed allocations from European sites, further assessment of air quality is required where changes to the road network or traffic volumes might increase daily traffic flows by 1,000 Average Annual Daily Traffic (AADT) or more where the road stretch has sensitive habitats within 200 m of the road. Air quality considerations need to have appropriate regard for any impacts that may act in combination. It is unclear whether this work has been done.

5.10.8 Water resource use and waste water discharge

Whilst recognising that the HRA was produced in advance of the draft Water Cycle Study (WCS) being completed, Natural England would expect future iterations of the HRA to recognise the need for water efficiency planning policies to support water efficiency requirements in new builds. Solutions to any water quality issues or water supply issues identified in the WCS need to form part of the detailed master plan stage so there is certainty in what is required and timely delivery, prior to any planning application being made.

With regard to any water treatment issues identified, the HRA will need to examine if the Local Plan contains clear wording in relation to assuring timely delivery of required infrastructure and treatment capabilities for phosphate, ammonia and nitrogen.

7.2 Appropriate Assessment of Policy 3 – Environmental Protection and Enhancement

Whilst Natural England agrees that the Policy will not have an adverse effect on any European site, we do not consider the current wording and supporting text to be sufficient to secure the delivery of the mitigation measures identified in the HRA, for reasons already outlined in our response to the Local Plan above.

8.2 Assessment of Policy 4 – Strategic Infrastructure

8.2 We refer to the second paragraph of our advice under 5.10.7 above. It is unclear whether any predicted increases to traffic flow (1000+ AADT) as a result of the Local Plan have been identified and assessed on existing roads within 200 m of sensitive features of any European sites. Any such increases arising from the Plan whether alone and in-combination need to be assessed at this strategic Plan stage rather than when individual scheme proposals are put forward.

8.2.2 We agree with and support the recommended text amendment to the policy regarding the NWL road.

8.2.4 We agree with and support the recommended text amendment regarding the Major Road Network.

8.2.5 We refer to our comments under 5.10.8 above. Until the findings from the WCS are assessed against the Plan's relevant policies in terms of water quality and water resources, and amended where necessary, it is not possible to assess further. It should be noted that the required improvements to waste water infrastructure are required as mitigation measures for impacts from new developments that are proposed in Local Plans.

8.2.7 For the reasons provided above, Natural England does not consider it possible at this stage to conclude no adverse effect upon the integrity of any European site.

9.2.1 Assessment of Policy 5 – Homes

Whilst Natural England agrees that the Policy will not have an adverse effect on any European site, we do not consider the current wording and supporting text of Policy 3 to be sufficient to secure the delivery of the mitigation measures identified in the HRA, for reasons already outlined in our response to the Local Plan above.

10.2.2 We agree with the assessment in terms of the locations of employment sites and that there is no single proposed employment facility that might have significant environmental impacts that might affect a European site at distance. However, the Plan aims to deliver 33,000 jobs over the Plan

period and the impacts in terms of water resources and water quality should be considered, using the findings from the WCS.

10.2.5. We agree with and support the recommended text amendment to the policy as described with regard to tourism development.

11.0 Assessment of Policy 7 – Strategy for the Areas of Growth

Policy 7.1 - The Norwich Urban Area including the fringe parishes

Policy 7.2 - The Main Towns

Policy 7.3 - The Key Service Centres

Policy 7.4 – Village Clusters

As outlined in our response to the Local Plan above, Natural England has concerns whether the current wording and supporting text of various Plan policies are sufficient to secure the delivery of the mitigation measures identified in the HRA including GI, whether on-site or off-site, and SANGS. It needs to be made clearer in the HRA how all the potential impacts identified under 3.2.1 have been assessed for Policy 7, and cross reference other relevant policies eg for increased urbanisation.

Where it states in the HRA that “*the scale of housing growth means that the emphasis will need to remain on providing sufficient GI by developers...*” the HRA should identify which allocations will require this, particularly in view of our comments on Zol made in relation to 5.5 above . Where GI is required, reference should be incorporated into the policy and supporting text of each individual site allocation policy, making it clear that the allocation will only be deliverable if a project level HRA can demonstrate no adverse effects. Similarly, the policy and supporting text of each individual site allocation policy will need to include details of any other non-recreational related mitigation measures where these are identified at a subsequent stage of the Plan (together with a requirement for a project level HRA). The requirement for individual project level HRAs needs to be covered in the revised HRA, (and reflected in the relevant policy wording within the Local Plan) in light of the Zol in the GIRAMS.

Currently, it is unclear why new individual housing allocations do not reference the HRA requirements. For example in Acle, carried over housing allocation ACL 2 (allocated in 2016) specifies in the policy wording “*Development must ensure no detrimental effect on Broadland SPA, Broadland Ramsar and The Broads SAC.*” The new preferred housing site allocations in Acle GNLP 0378 and 02139 do not.

There appears to be great reliance placed on the emerging GIRAMS to deliver the necessary mitigation, although it has yet to be finalised and agreed, and its findings need to be incorporated comprehensively and consistently into the relevant policies in the Local Plan.

12. Conclusions

Natural England does not consider that it is possible at this stage to conclude no adverse effect upon the integrity of any European site arising from the GNLP alone.

We would welcome further discussion about the HRA and the revisions required with the GNLP authorities.

Sustainability Appraisal and Strategic Environmental Assessment Report

Natural England welcomes the production of the latest iteration of the above document, dated January 2020, and prepared by Lepus Consulting, and in the following comments below it shall be referred to as the Sustainability Appraisal (SA).

We previously commented on the scoping of the SA in our response dated 12 August 2016 (our ref: 1887410) and on the interim SA in our response (dated 21 March 2018; our ref 235617) to the GNLP growth options and site proposals consultation. Whilst we recognise that some of our advice has been reflected in the latest version of the SA, we have the following comments to make:

2.10 SA Objective 1 – Air Quality and Noise

Please refer to our comments on air quality and roads made in response to the HRA. The SA objective may need to be revised if further assessment demonstrates an impact on any sensitive habitats of European sites that lie within 200 m of the existing road network or a new road.

2.11 SA Objective 2 – Climate Change Mitigation and Adaptation

Greater clarity about which carbon emissions have been considered would be welcome. It appears that only residential development has been included and it is unclear how the omission of all non-residential development proposals would affect the SA.

2.12 SA Objective 3 – Biodiversity, Geodiversity and Green Infrastructure

The rationale for the selection of a 5 km buffer zone as opposed to a greater distance needs to be more fully explained given the findings of some visitor studies.

There is no further mention of geodiversity or green infrastructure beyond the heading.

The results of the emerging GIRAMS should be used to inform future iterations of the SA.

2.13 SA Objective 4 - Landscape

The text under heading *The Norfolk Coast and Suffolk Coast and Heaths AONB* needs to be checked and corrected for various errors in the first sentence. It would be useful to include how the 8 km distance was calculated. How has it been determined that there would be no impacts on these AONBs as a result of development proposed in the Plan as, for example a growing population, served by improvements to the road may make result in more visits to honeypot sites within either AONB and resulting impacts on their special qualities.

It is unclear why National and Country Parks have been included under the same heading as they are designated for different purposes and afforded different levels of legal protection and weight under the planning system. Please note that as the Broads was designated under a different piece of legislation to the National Parks, and it would be better to be referred to as a member of the National Park family.

2.15 SA Objective 5 – Population and Communities

It would be clearer if references to '*local landscape designations*' were replaced with '*multi-functional green infrastructure*' in keeping with the draft Local Plan and HRA.

2.17 SA Objective 8 - Health

Again, it would be more meaningful if the phrase '*multi-functional green infrastructure*' was used rather than '*green network*' or '*greenspace*' or '*accessible natural habitats*'.

2.21 SA Objective 12 – Transport and Access to Services

We consider it would be helpful if development was assessed in terms of safe and easy access by all forms of non-motorised vehicle, be it walking or cycling, given the majority of development is concentrated in Norwich and the urban fringes, and in the main towns.

2.23 SA Objective 14 – Natural Resources, Waste and Contaminated Land

It would be helpful to state what is meant by natural resources in the context of the Plan and to use

terminology consistently with regard to greenfield sites.

2.24 SA Objective 15 – Water

Given the wealth of wetland sites, both designated and non-designated, that have the potential to be affected by the GNLP, we consider it would be more helpful to use the headings of '*Water Quality*' and '*Water Resources*' and reflect this in the supporting texts under each heading, including discharges from developments and water stress. The assumptions made under this objective and through the SA will need to be re-examined and revised where necessary based on the findings of the WCS.

Table 3.2 Overview of site assessment pre-mitigation

For ease of reference, it would be appreciated if the matrix headings at the top of the table could be duplicated at the top of each subsequent page.

3. Site Assessments and 4. Policy Assessments

Due to a number of concerns and suggested amendments that we have raised in relation to the Local Plan and the HRA, our comments on the SA Objectives above, and the need to incorporate the findings of the emerging WCS and the GIRAMS, these sections should be re-assessed accordingly.

Appendix A: SA Framework

Please refer back to our previous consultation responses in 2016 and 2018 for our advice regarding what monitoring indicators to use. Natural England considers that all the monitoring indicators should be relevant to assessing the significant environmental effects of implementing the policies in the GNLP and of value in monitoring the performance of the Plan.

Natural England's Conclusions on this Consultation

We advise that further work and revision to the Local Plan's policies, Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) is required, including a review and revision of the wording for selective policies in the Draft Sites Document. We recognise that the results and recommendations of the WCS and the GIRAMS need to be assimilated into the Local Plan and supporting documents.

In order to complete this work before the pre-submission stage, we would welcome working together with the GNLP authorities, and other relevant parties, to address the issues that we have raised in our consultation response.

Yours sincerely

Louise Oliver
Norfolk and Suffolk Team