

Sustainability Appraisal Objectives: Focused Consultation Responses
Report by Planning Policy Officer

Summary:	A four week consultation on some minor amendments to the Sustainability Appraisal Objectives has been completed. The report informs Members of the responses received.
Recommendation:	To amend the Sustainability Appraisal Objectives as set out at section 4 of this report.

1 Introduction

- 1.1 The Sustainability Appraisal (SA) was initially scoped in November 2014¹. After using the SA Objectives at the first stage of producing the Local Plan² and also using them in relation to assessing flood risk, it has become apparent that two of the SA Objectives could be improved to be clearer in their wording as well as more consistent with the NPPF. In particular, SOC6 as worded could only be applied to the provision of new services rather than assessing the location of a site and its accessibility to existing services.

2 The Proposed Amendments.

- 2.1 The two SA Objectives it is proposed to improve are:

- SOC6: To improve the quality, range and accessibility of community services and facilities
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness

- 2.2 The proposed new SA objectives (which were consulted on) are:

- ENV10: To achieve the highest quality of design that is innovative, ***imaginative***, and sustainable and reflects local distinctiveness
- SOC6a: To improve the quality, range and accessibility of community services and facilities
- ***SOC6b: To ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities***

¹ The Sustainability Scoping Report is here: <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

² The Interim Sustainability Scoping Report (Feb 2016) is here: http://www.broads-authority.gov.uk/_data/assets/pdf_file/0011/710858/Broads-Local-Plan-Issues-and-Options-Interim-SA-Final.pdf

2.3 The following organisations were invited to comment: Environment Agency, Historic England, Natural England, our district and county councils, RSPB, New Anglia LEP, Wild Anglia and Marine Management Organisation.

3 Comments received

Organisation	Comment	Broads Authority Response
Natural England	No comments	Noted.
Norfolk County Council	Support changes.	Support noted.
North Norfolk District Council	It is the decision making criteria that are important in the applying the objective and it is felt that there is no need to split Objective SOC6 into two separate objectives. In doing so you are making the SA objectives very specific and perhaps limit. Overall from the appendix 5 in the scoping report it can be seen that the decision making criteria / prompting questions adequacy cover accessibility and cover this specific point.	The decision making criteria do allow for the accessibility objective to be interpreted both ways – i.e. is it a new service that is located in a sustainable location or is the allocation for, say, dwellings in a location well related to services? But the SA Objective itself when read literally only relates to improving the accessibility of a service or improving the range. We do not think this is limiting as whilst there are two SA objectives number 6, the decision making criteria are the same and indeed they will be assessed together but one will apply to new service provision and another will apply to new dwellings. The Authority considers this change makes the objectives clearer and as such intend to make these changes to the SA objectives (on considering other comments received).
	In relation to changes to ENV10 – this is a correction to grammar, although if given a preference there is a case for just delating any reference to using ones “imagination” and leaving the objective as ... <i>‘innovative, sustainable and reflects local distinctiveness’</i> as innovation implies imagination.	We consider that ‘imaginative’ is a relevant aim for development in the Broads. The synonyms for innovation and imagination tend to be different. Whilst technical innovation is important; so too is creativity. As such, we intend to keep this as the SA Objective (on considering other comments received).
Broadland District Council	No comments other than bringing your attention to a typo on SOC6b – “sustainably” not “sustainability”	Error noted and final changes will be checked thoroughly.
Historic England	<p>Historic England supports the amendment to SA objectives ENV 10 which is of relevance to Historic England’s primary duty to consider the impact of proposals on the historic environment. ENV 10 is directly related to cultural heritage, aesthetic values and sense of place. This is acknowledged in the related ecosystems services as reported in appendix 3 of the issues and options sustainability appraisal.</p> <p>The deletion of <i>‘imaginable’</i> and its replacement by <i>‘imaginative’</i> allows for a more focused assessment of the likely significant effects that may arise from decisions made on the emerging Local Plan. As the ultimate policies that result will require a precision of language, then this new wording is deemed an improvement and will assist in the delivery of the sustainability appraisal that will inform the pre-submission Local Plan.</p>	Support noted.

4 Recommendation

4.1 It is recommended that the following amended SA Objectives are adopted and used:

- ENV10: To achieve the highest quality of design that is innovative, imaginative, and sustainable and reflects local distinctiveness
- SOC6a: To improve the quality, range and accessibility of community services and facilities
- SOC6b: To ensure new development is sustainably located with good access by means other than a private car to a range of community services and facilities

5 Financial Implications

5.1 None.

Background papers: None

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Appendices: None