

Local Plan: SA Scoping Report (October 2014)

Responses

Broadland District Council

The District Council does not wish to make any comments on the SA Scoping Report.

Broads Authority Officer Summary of Response: No comments.

Broads Authority Comment: Noted.

English Heritage

Within the SEA/SA process it is crucial that the historic environment within the Norfolk and Suffolk Broads is properly recognised and accounted for. English Heritage promotes a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. Please note that we have produced guidance entitled 'Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment' which is available at: www.helm.org.uk and <http://www.english-heritage.org.uk/publications/strategic-environment-assessment-sustainability-appraisal-historic-environment/> This guidance sets out detailed information on scoping, relevant plans, programmes and policies and gives general pointers to baseline information. Answers to many of the questions posed within the accompanying questionnaire can be found in this document and as such we do not intend to reiterate this here. Whilst it is noted that the report aims to provide a broad scope of issues, it is critical that these will be further refined for Broads Local Plan and any individual DPDs as these are progressed. As well as looking at the mitigation of impacts, the appraisal process should also identify opportunities for enhancement. We also recommend that your Heritage Environment Officer should be involved in the appraisal of the Broads Local Plan, DPDs and other relevant plans as they are best placed to provide information and advice on local historic environment issues, mitigation and in terms of securing future wider benefits for the historic environment. In addition to the above, we have a number of detailed comments, including comments regarding the text included within the main document and appendices, as follows: Sustainability Appraisal Scoping Report for Broads Local Plan

3. OTHER RELEVANT POLICIES, PLANS AND PROGRAMMES AND SUSTAINABILITY OBJECTIVES

European: We welcome the reference to the Valetta Convention (European Convention on the protection of Archaeological heritage, 2001).

National: We welcome the reference to the National Planning Policy Framework (2012). Although PPS5 has been superseded by the NPPF, the PPS5 Practice Guide is still valid and should be referred to. <https://www.english-heritage.org.uk/professional/advice/government-planning-policy/pps-practice-guide/> This will, however, be replaced in early 2015 by good practice advice currently being developed by English Heritage in conjunction with the Historic Environment Forum. References in existing document to PPS5 policies are now redundant, but because the policies in the NPPF are very similar and the intent is the same, the PPS5 Practice Guide remains very useful in the application of the NPPF. However, it should of course be read in the context of what has happened since, including the launch of the NPPF Planning Practice Guidance. The way it is interpreted will also depend on the specifics of the case. The reference to 'Scheduled Monuments & nationally important but non-scheduled monuments.' (DCMS 2013) is welcomed as is the reference to 'The Archaeology of Norfolk's Broads, zone results of the national mapping programme' (English Heritage, 2007). The references to the 'Historic Environment Good Practice Advice in Planning; 'Historic Environment Good Practice Advice Note 1: The Historic Environment in Local Plans', and 'Historic Environment Good Practice Advice Note 3: The Setting of Heritage Assets' is welcomed. Reference should also be made to 'Historic Environment Good Practice Advice

Note 2: Decision-Taking in the Historic Environment .’ Final versions of these documents (consultation on which has now closed) along with additional more detailed information (termed Technical Advice in Planning) will replace both the PPS5 Planning and the Historic Environment: Historic Environment Planning Practice Guide (2010) and various pieces of English Heritage guidance. This is likely to be in early 2015. Appendix 2: Literature Review: This should reflect the references in the Sustainability Appraisal Scoping Report for Broads Local Plan section on Other Relevant Policies, Plans and Programmes and Sustainability Objectives, including the additional references proposed above. Appendix 3a: Baseline Data Cultural Heritage: This section should provide numbers for each of the designated heritage assets found in the Broads Authority area; listed buildings, conservation area, registered parks and gardens and scheduled monuments, as well as the numbers for listed mills, to reflect and summarise the information shown in Appendix 3b Baseline Data Map Bundle. Whilst the references numbers of Conservation Area appraisals reviewed and listed buildings at risk are welcomed, the section should also include a reference to the numbers of buildings on the Broads Local List of heritage assets and Heritage at Risk in the Broads Authority area: <http://www.english-heritage.org.uk/publications/har-2014-registers/>

Appendix 5: Sustainability Appraisal Framework: We welcome the SA Objective ‘To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.’ English Heritage considers that for an SA to meet the requirements of the SEA Directive to assess impacts on cultural heritage, it needs to include a specific objective “conserve and enhance the historic environment, heritage assets and their settings”. This objective should be included in the SA Framework and replace the SA Objective ‘To conserve and where appropriate enhance the cultural heritage and archaeological importance of the area.’ English Heritage welcomes the SA Objectives; ‘To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.’ And ‘To improve education and skills including those related to local traditional industries.’

Broads Authority Officer Summary of Response:

- 1: Signposts to 'Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment'.
- 2: SA should provide opportunities for enhancement.
- 3: Heritage Officer appraise the Local Plan.
- 4: PPS5 practice guide is still relevant.
- 5: Refer to ‘Historic Environment Good Practice Advice Note 2: Decision-Taking in the Historic Environment ’.
- 6: Appendix 3a: Baseline Data Cultural Heritage: This section should provide numbers for each of the designated heritage assets found in the Broads Authority area; listed buildings, conservation area, registered parks and gardens and scheduled monuments, as well as the numbers for listed mills, to reflect and summarise the information shown in Appendix 3b Baseline Data Map Bundle. Reference to the numbers of buildings on the Broads Local List of heritage assets and Heritage at Risk in the Broads Authority area.
- 7: Include a specific objective “conserve and enhance the historic environment, heritage assets and their settings”. This objective should be included in the SA Framework and replace the SA Objective ‘To conserve and where appropriate enhance the cultural heritage and archaeological importance of the area.’

Broads Authority Comment:

- 1: Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment will be read and considered.
- 2: The SA objective (as it stands now and notwithstanding the other EH comment relating to proposed changes) refers to enhancements. Section 7 of the Scoping Report says 'The process will seek to minimise any negative impacts but also seek to maximise any positive impacts'. As such, no further action required as the SA process will seek enhancements.

- 3: During the production of the Sites Specifics Local Plan, a group of internal experts on different themes/issues in the Broads was convened to help produce the SA and assess the Local Plan. The Heritage Officer was part of this group and this approach will be repeated for the production of the new Local Plan.
 - 4: Noted re PPS5 practice guide. This will be reviewed and considered.
 - 5: This note will be reviewed and considered.
 - 6: In future documents we will consider displaying numbers as suggested, although displaying on maps shows the spatial context rather than simply stating the numbers.
 - 7: The precise wording of this SA Objective will be discussed and agreed at a meeting between English Heritage and the BA in January 2015.
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Great Yarmouth Borough Council

The Scoping Report is considered to be proportionate and accurate. The consideration of other SA Objectives in the proposed SA Framework including the 22 SA Objectives which form the Great Yarmouth's SA Framework is welcomed. Whilst the Scoping Report has identified a comprehensive review of relevant plans and programmes, it is reiterated that all policies in the emerging Great Yarmouth Core Strategy, and information pertaining to its subsequent Sustainability Appraisal, are taken in account. Whilst the Core Strategy and SA have not yet been adopted, they are expected to be examined and adopted by early 2015 and are therefore material to the scope of the Broads Authority Local Plan. The "Scoping Report" may also wish to further draw out sustainability issues derived from the Index of Multiple Deprivation. It is noted that deprivation level related to housing and barriers to services are particularly chronic due to typology of the Broads Authority Area as rural hinterland. With a higher than average ageing population, it is important that accessibility to core services such as public transport and local facilities are improved and affordable housing needs are met.

Broads Authority Officer Summary of Response:

- 1: All policies in the emerging Great Yarmouth Core Strategy, and information pertaining to its subsequent Sustainability Appraisal, should be taken into account.
- 2: It is noted that deprivation level related to housing and barriers to services are particularly chronic due to typology of the Broads Authority Area as rural hinterland. With a higher than average ageing population, it is important that accessibility to core services such as public transport and local facilities are improved and affordable housing needs are met.

Broads Authority Comment:

- 1: Noted and GYBC policy documents will be reviewed and considered.
 - 2: Public transport, age profile of the area, access to facilities and affordable housing are likely to be elements the Local Plan looks into.
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Marine Management Organisation

MMO has no comments to submit in relation to this consultation.

Broads Authority Officer Summary of Response:	No comments.
Broads Authority Comment:	Noted.

Natural England

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 welcome that issues of importance to Natural England including the protection and enhancement of biodiversity, including designated sites such as Sites of Special Scientific Interest (SSSIs) and European sites [European sites include Special Areas of Conservation and Special Protection Areas. Listed or proposed Ramsar sites are protected as a matter of Government policy. Paragraph 118 of the National Planning Policy Framework applies the same protection measures as those in place for European sites.], green infrastructure, landscape character, soils and climate change mitigation and adaptation will be considered through the Sustainability Appraisal (SA) process. The scope of the SA should be relevant to the issues addressed in the local plan which itself should reflect the requirements of the National Planning Policy Framework (NPPF). Accordingly the SA should set environmental objectives and assess the effects of the plan policies and allocations against these, having regard to reasonable alternatives. Where adverse effects are predicted the SA should identify mitigation measures to address these. Natural England supports the SA objectives and framework including objectives to protect and enhance biodiversity and geodiversity, water quality and use and mitigation and adaptation to climate change. Several SSSIs and European sites lie within or in close proximity to the Broads Authority boundary hence we welcome recognition of the natural environment as a key strength of the Local Plan area. The Sustainability Appraisal should ensure that Plan policies require proposals to protect and enhance the natural environment, including designated sites and landscapes, in line with the NPPF. Proposals should deliver net biodiversity gain where possible through contribution to local BAP habitats and species targets. The area includes significant swathes of green infrastructure including areas of Priority Biodiversity Action Plan (BAP) habitat. Some of this includes accessible natural greenspace providing multi-functional benefits for wildlife and people. Again, Natural England would expect the Local Plan, through the Sustainability Appraisal process, to ensure the protection and enhancement of these areas, in line with the NPPF. Consideration should be given to the objectives and targets of the local BAP and Green Infrastructure Strategy. The SA should consider the potential for brownfield land to support habitats and species of biodiversity importance; the biodiversity value of brownfield land should be fully assessed and development should only be progressed where adverse effects can be satisfactorily mitigated. The SA should consider the inter-relationships between topics, for example a number of topics can have a significant influence on biodiversity, such as air quality, noise, water quality and water resources. We recommend that impacts on protected species are considered as part of the SA process. Natural England has produced standing advice [<https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>] to help local planning authorities to better understand the impact of particular developments on protected or BAP species should they be identified as an issue. We understand that a Habitats Regulations Assessment (HRA) will be undertaken separately. We welcome recognition that the findings of the assessment should inform the SA process. We look forward to being consulted on this in the near future.

Broads Authority Officer Summary of Response:

Generic response with no comments specific to the content of this particular SA Scoping Report.

Broads Authority Comment:

Noted.

Norfolk County Council

NCC Minerals and Waste: We are pleased to note the inclusion of the Norfolk and Suffolk Minerals and Waste Local Plans in the Literature Review and Development of SA Objectives. We are pleased to note the inclusion of an SA Objective with decision making criteria referring to safeguarded mineral sites and mineral resources, and the inclusion of an SA Objective to minimise the production and impacts of waste through reducing what is wasted, re-using and recycling what is left. NCC Infrastructure and Economic Growth: Welcomes the recognition in threats section of the potential impacts major housing and employment growth will have on the authority. Reference could be made to infrastructure delivery required to mitigate the impact of this growth and how

it will be funded. At this stage it is not considered that the SA Scoping Opinion raises any other strategic issues with Norfolk County Council. Obviously you would consult the County Council when you review your Local Plan. I assume, under your statutory duty to co-operate (Localism Act 2011), that if you feel there are any strategic issues arising or likely to arise that you would seek further discussion with Norfolk County Council i.e. through myself as the first point of contact.

Broads Authority Officer Summary of Response:

Welcomes the recognition in threats section of the potential impacts major housing and employment growth will have on the authority. Reference could be made to infrastructure delivery required to mitigate the impact of this growth and how it will be funded.

Broads Authority Comment:

Noted and this could be included in the literature review/made more obvious in the next iterations of the SA.

Waveney District Council

As part of the documents that have been scoped, it may be worth considering supplementary planning documents (SPD) that have been prepared by neighbouring authorities. These do not set out new policies, however, the information may provide further background as to how a policy will be implemented. For example, an open space policy may require new residential developments to provide open space to serve the development, however, supporting information such as thresholds and quantities may be set out in the SPD.

Waveney's adopted Lowestoft Lake Lothing and Outer Harbour Area Action Plan (AAP) is the key planning document to guide regeneration in central Lowestoft. This area is the southern gateway to the Broads. While the Broads Executive Area lies outside the boundary of the AAP, the boundary is close to an area of Oulton Broad administered by the Broads Authority. It may be worth considering the listing of Area Action Plans (as part of the suite of Local Plan documents) that have been prepared by neighbouring authorities.

Broads Authority Officer Summary of Response:

Review Area Action Plans and SPDs produced by constituent authorities.

Broads Authority Comment:

Agreed.
