

Strategic Environmental Assessment (SEA) for the Dickleburgh and Rushall Neighbourhood Plan

Environmental Report (submission version)

December 2024

Quality information

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1. Non-Technical Summary (NTS)

1.1 Introduction

- 1.1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Dickleburgh and Rushall Neighbourhood Plan (DRNP). The DRNP is being prepared under the Neighbourhood Planning Regulations 2012 (as amended) and in the context of the adopted Greater Norwich Local Plan (GNLP). Once 'made' the DRNP will have material weight when deciding on planning applications, alongside the GNLP.
- 1.1.2 SEA is a required process for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating potential negative effects and maximising potential positive effects.
- 1.1.3 It is a requirement that the SEA process is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004. The Regulations stipulate that a report (known as the Environmental Report) must be published for consultation alongside the draft plan that "*identifies, describes, and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*".
- 1.1.4 This report (and NTS) is the Environmental Report for the DRNP. It is published alongside the submission version of the Plan.
- 1.1.5 SEA reporting essentially involves answering the following questions in turn:
1. What has plan-making / SEA involved up to this point?
 - including in relation to 'reasonable alternatives'.
 2. What are the SEA findings at this stage?
 - i.e., in relation to the draft plan.
 3. What happens next?
- 1.1.6 The Environmental Report and this NTS are structured according to these questions, but first it is necessary to introduce the vision and objectives of the DRNP and the scope of the SEA.

1.2 Vision and objectives of the DRNP

- 1.2.1 The following vision has been established for the DRNP:

"The parish of Dickleburgh and Rushall will continue to be a vibrant parish with a strong sense of community with residents that feel valued.

The unique and historic landscape will be preserved. Development will be well designed to integrate with the existing housing and shall enhance and harmonise with the character of the parish, while protecting its local heritage, natural environment and rural nature.

Dickleburgh and Rushall will remain a caring and safe community in which the quality of life for current and future generations will flourish."

- 1.2.2 To achieve this vision, the following eleven objectives have been identified, across three themes:

Housing

- Objective 1: To provide sufficient and appropriate high-quality housing in small-scale developments to meet local needs within a balanced housing market.
- Objective 2: To provide mixed-use development that complements the character and heritage of the rural villages of Dickleburgh and Rushall.

Transport

- Objective 1: Address the issue of significant numbers of lorries and HGVs travelling through areas of the parish judged to be hazardous and perilous to both pedestrians and the environment.
- Objective 2: Improve the safety of pedestrians and residents of the parish.
- Objective 3: Reduce traffic congestion in the parish.
- Objective 4: To future proof the housing infrastructure to support environmentally friendly transport.

Environment and Biodiversity

- Objective 1: To put in place measures and policies that; ensure the protection and enhancement of all our natural habitats, including hedgerows, coppices, ditches and key natural environmental assets, in order to encourage an increase in biodiversity across the parish and provide environments conducive to maintaining healthy populations of birds, bats and other fauna.
- Objective 2: To protect and promote an increase of green footpaths, bridleways and cycleways to further enable public access to open countryside, green sites for community use and woodlands, including any new parish Woodlands, and protect and enhance vistas and views of significance within the parish.
- Objective 3: To ensure the maintenance of distinct settlements and define clear settlement gaps to ensure the continuance of these distinct and separate settlements.
- Objective 4: To challenge environmental risk and promote carbon offsetting by supporting creative thinking and solutions that safeguard and enhance the natural environment. To promote, within the design/build of new developments, features such as permeable driveways / hard standing, provision of green energy, green walls, green roofing, water harvesting and full utilisation of grey water solutions.
- Objective 5: Establish clean environment policies to address issues of pollution and promote wellbeing and improved public health. This will include a 'beautification' policy as part of the approach to promote well-being by improving the overall visual enhancement and character of the parish.

1.3 Scope of the SEA

- 1.3.1 The scope of the SEA is the sustainability issues and objectives that provide the focus of the assessment of the plan and reasonable alternatives. The SEA scope is summarised in a list of these and objectives, known as the SEA framework. Table 1.1 provides the summary SEA framework, whilst Appendix B identifies the full SEA framework to include decision-aiding assessment questions, and the key issues that have informed the development of this framework.

Table 1.1: Summary SEA framework for the DRNP

SEA theme	SEA objective
Biodiversity and geodiversity	Protect and enhance biodiversity and geodiversity.
Climate change	Reduce the contribution to climate change made by activities within the neighbourhood area.
	Support the resilience of the neighbourhood area to the potential effects of climate change, including flooding.
Landscape	To protect and enhance the character and quality of the immediate and surrounding landscape and villagescape.
Historic environment	Protect, conserve and enhance the historic environment within and surrounding the neighbourhood area.
Land, soil, and water resources	Ensure the efficient and effective use of land.
	Protect and enhance water quality and use and manage water resources in a sustainable manner.
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Transportation	Promote sustainable transport use and reduce the need to travel.

1.4 Plan-making so far (assessment of alternatives)

- 1.4.1 An important element of the SEA process involves assessing ‘reasonable alternatives’ in time to inform development of the proposals, and then publishing information on reasonable alternatives for consultation alongside the proposals.
- 1.4.2 As such, the Environmental Report explains how work was undertaken to develop and assess a ‘reasonable’ range of alternative approaches to the allocation of land for housing, including alternative sites.
- 1.4.3 The GNLP and South Norfolk Village Clusters Housing Allocations Local Plan provide the strategic directions for growth, with the expectation that the DRNP will identify suitable land to deliver a minimum of 25 new homes in the

period up to 2038. Having explored all available sites, a long list of sites was whittled down to 11 options. With a relatively large number of site options remaining for consideration, the assessment considers the merits and constraints associated with the spatial context of development, allowing for grouping of the options and a concise and informative assessment of four options as follows – see Figure 1.1:

- **Option 1:** Development of one or more sites in the north-west of Dickleburgh village (with the choice of Site numbers 1, 18, and N2).
- **Option 2:** Development of one or more sites in the south-west of Dickleburgh village (with the choice of Site numbers 2, 4, and N3).
- **Option 3:** Development of one or more sites in the east of Dickleburgh village (with the choice of Site numbers 13 and 14).
- **Option 4:** Development of one or more sites in the south-east of Dickleburgh village (with the choice of Site numbers 8, 10, and 11).

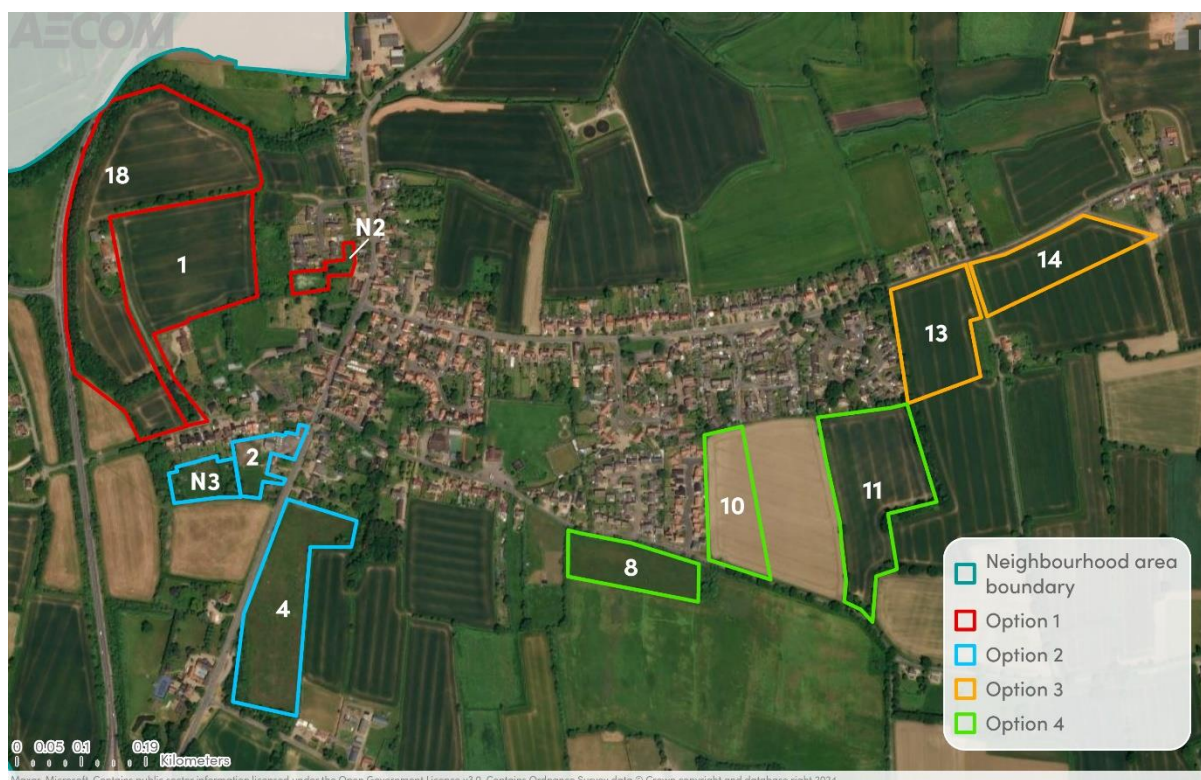


Figure 1.1: The reasonable alternatives options

- 1.4.4 In terms of methodology, for each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping as a methodological framework. Effects are stated in a summary table, supported by colour coding. Green is used to indicate significant positive effects, whilst red is used to indicate significant negative effects. Where appropriate neutral effects, or uncertainty will also be noted. Uncertainty is noted with grey shading. Supporting text is provided to indicate the reasoning behind the summarised and predicted likely effects.
- 1.4.5 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

1.4.6 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best.

1.4.7 Finally, it is important to note that effects are predicted considering the criteria presented within Regulations.¹ So, for example, account is taken of the duration, frequency, and reversibility of effects.

1.4.8 The assessment has concluded the following:

Summary of likely effects and ranking of reasonable alternatives

SEA theme	Outcome dimension	Option 1 (north-west)	Option 2 (south-west)	Option 3 (east)	Option 4 (south east)
Biodiversity and geodiversity	Significant effect?	No	No	No	No
	Rank	4	3	2	1
Climate change	Significant effect?	Yes - negative	No	No	No
	Rank	4	2	1	3
Landscape	Significant effect?	No	No	No	No
	Rank	4	=1	3	=1
Historic environment	Significant effect?	Yes - negative	Yes - negative	Uncertain	No
	Rank	4	3	2	1
Land, soil, and water resources	Significant effect?	No	No	No	No
	Rank	4	=1	=1	=1
Community wellbeing	Significant effect?	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	1	2	4	3
Transportation	Significant effect?	No	No	Yes - negative	Yes - negative
	Rank	=1	=1	=3	=3

¹ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

- 1.4.9 All options are considered likely to lead to **significant positive effects** regarding the community wellbeing SEA topic. This is because all options meet the required housing need of the neighbourhood area, including an assumed proportion of affordable homes.
- 1.4.10 **Significant negative effects** are considered likely in relation to fluvial flood risk for Option 1, given its proximity to Dickleburgh Stream. **Significant negative effects** are also expected in relation to the historic environment for Options 1 and 2 given the proximity of these options to listed buildings and the Dickleburgh Conservation Area. **Significant negative effects** are also considered likely under Options 3 and 4 in relation to transportation given the lack of existing footpath access and the viability of being able to improve this situation through the small-scale growth expected. Some **uncertainty** is also noted under Option 3 in relation to the historic environment, reflecting the need for further archaeological investigations to inform the potential effects of development in this area.
- 1.4.11 The NP Steering Group responded to this assessment and identified Option 1 as the preferred approach for the DRNP, allocating Site 1 under this option.

1.5 Assessment findings at this stage (appraisal of the plan)

- 1.5.1 Part 2 of the Environmental report presents an assessment of the DRNP as a whole. Assessment findings are presented as a series of narratives under the SEA framework topic headings.
- 1.5.2 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping as a methodological framework.
- 1.5.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 1.5.4 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the assessment as appropriate.
- 1.5.5 The following conclusions are reached in the assessment:

- 1.5.6 *The only significant effects predicted likely in implementation of the DRNP are positive in nature and relate to the community wellbeing SEA theme. This reflects a positive spatial strategy that meets the identified housing need and ensures adequate connectivity, alongside the protection of key community facilities and resident health and wellbeing.*
- 1.5.7 *Minor negative effects are considered likely in relation to the SEA themes of landscape, historic environment, land, soil, and water resources, and transportation. The proposed DRNP policies provide mitigation that should minimise the identified potential for adverse impacts, and the residual effects largely reflect the inevitable loss of greenfield land neighbouring the conservation area and Dickleburgh Stream, and a likely increase in private car use in the neighbourhood area. Neutral effects are considered achievable in relation to the historic environment, though some uncertainty exists until precise development proposals are known.*
- 1.5.8 *Minor positive effects are also concluded as likely in relation to biodiversity, and landscape, reflecting the wider policies provisions that identify and protect green corridors, promote biodiversity net gains in development, and propose settlement and local gaps where there is a preference for the land to remain undeveloped. This is also likely to lead to minor positive cumulative effects given that landscape and biodiversity effects extend the immediate neighbourhood area to provide benefits at a more regional scale.*
- 1.5.9 *Neutral effects are predicted as most likely in relation to climate change where it is recognised that whilst mitigation will be required to avoid negative effects arising in future development of the neighbourhood area, the DRNP proposes multiple policies that seek to ensure such mitigation is delivered alongside development. The DRNP also proposes connected development and policies that seek to improve the sustainability performance of new development. On this basis, no significant deviations from the baseline are anticipated.*

1.6 What happens next?

- 1.6.1 Following submission, the plan and supporting evidence (including this SEA Environmental Report) will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.
- 1.6.2 Assuming that the examination leads to a favourable outcome, the Neighbourhood Plan will then be subject to a referendum, organised by South Norfolk Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the DRNP will become part of the Development Plan for South Norfolk Council, covering the defined neighbourhood area.
- 1.6.3 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

- 1.6.4 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by South Norfolk Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the DRNP that would warrant more stringent monitoring over and above that already undertaken by South Norfolk Council.

2. Introduction

2.1 Background

- 2.1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Dickleburgh and Rushall Neighbourhood Plan (DRNP).
- 2.1.2 The DRNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012 and in the context of the adopted Greater Norwich Local Plan (GNLP). Once ‘made’ the DRNP will have material weight when deciding on planning applications, alongside the GNLP.
- 2.1.3 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the DRNP is a legal requirement.²
- 2.1.4 SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on SEA.
- 2.1.5 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that “*identifies, describes and evaluates*” the likely significant effects of implementing “*the plan, and reasonable alternatives*”.³ The report must then be considered, alongside consultation responses, when finalising the plan.
- 2.1.6 More specifically, the Report must answer the following three questions:
1. What has plan-making / SEA involved up to this point?
 - i.e., in relation to ‘reasonable alternatives’.
 2. What are the SEA findings at this stage?
 - i.e., in relation to the draft plan.
 3. What happens next?
- 2.1.7 This report is the Environmental Report (submission version) for the DRNP. It is published alongside the ‘submission’ version of the DRNP, under Regulation 16 of the Neighbourhood Planning Regulation (2012, as amended). It follows on from the previous ‘pre-submission’ version of the DRNP and SEA Environmental Report, considering feedback from Regulation 14 consultation held in 2023.
- 2.1.8 The Environmental Report is structured around answering questions 1, 2 and 3 in turn, to provide the required information.⁴

² The D&RNP was subject to informal screening by South Norfolk Council in 2021 and Scoping consultation in 2022 sought the wider opinions of statutory consultees.

³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

⁴ See **Appendix A** for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

2.2 What is the DRNP seeking to achieve?

- 2.2.1 The DRNP is guided by the strategic context provided by the adopted GNLP and covers the neighbourhood area depicted in Figure 2.1 within South Norfolk.

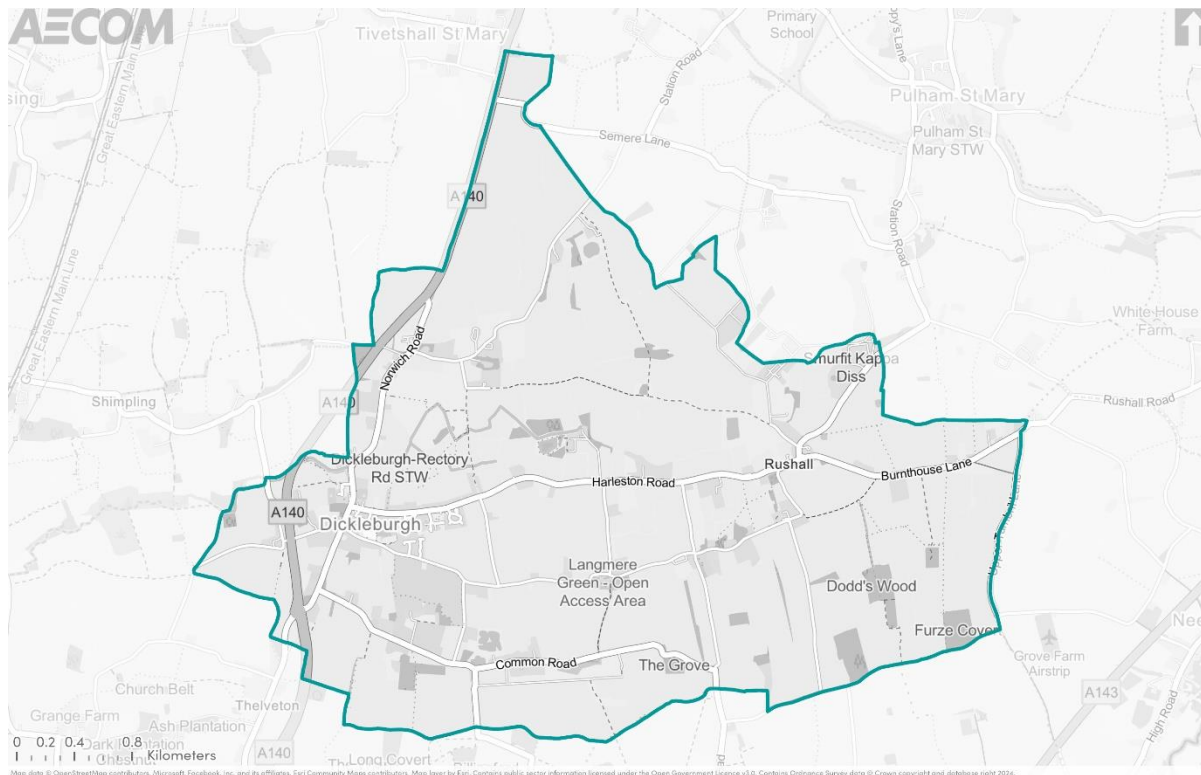


Figure 2.1: The DRNP neighbourhood area

Strategic context of the GNLP

- 2.2.2 The GNLP covers the areas administered by South Norfolk Council, Broadland District Council, Norwich City Council, and Norfolk County Council and was adopted by South Norfolk Council in March 2024.
- 2.2.3 The GNLP is formed of three parts: the Strategy, the Sites Plan, and the Monitoring Framework. Dickleburgh and Rushall are small villages in the South Norfolk area, where development will be further guided by the emerging South Norfolk Village Clusters Housing Allocations Local Plan (VCHAP). In addition to the allocations in the GNLP, a minimum of 1,200 new homes are expected to be allocated in the South Norfolk VCHAP and village clusters form the lowest (fourth) tier in the settlement hierarchy.
- 2.2.4 The Regulation 19 'pre-submission' version of the South Norfolk VCHAP (including any subsequent proposed modifications) identifies a minimum housing requirement of 25 new homes for the Dickleburgh 'cluster' (aligning with the neighbourhood area) and expects sites to be identified in the DRNP to meet this requirement.

Vision and objectives of the DRNP

- 2.2.5 The following vision has been established for the DRNP:

"The parish of Dickleburgh and Rushall will continue to be a vibrant parish with a strong sense of community with residents that feel valued."

The unique and historic landscape will be preserved. Development will be well designed to integrate with the existing housing and shall enhance and harmonise with the character of the parish, while protecting its local heritage, natural environment and rural nature.

Dickleburgh and Rushall will remain a caring and safe community in which the quality of life for current and future generations will flourish.”

- 2.2.6 To achieve this vision, the following eleven objectives have been identified, across three themes:

Housing

- Objective 1: To provide sufficient and appropriate high-quality housing in small-scale developments to meet local needs within a balanced housing market.
- Objective 2: To provide mixed-use development that complements the character and heritage of the rural villages of Dickleburgh and Rushall.

Transport

- Objective 1: Address the issue of significant numbers of lorries and HGVs travelling through areas of the parish judged to be hazardous and perilous to both pedestrians and the environment.
- Objective 2: Improve the safety of pedestrians and residents of the parish.
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Environment and Biodiversity

- Objective 1: To put in place measures and policies that; ensure the protection and enhancement of all our natural habitats, including hedgerows, coppices, ditches and key natural environmental assets, in order to encourage an increase in biodiversity across the parish and provide environments conducive to maintaining healthy populations of birds, bats and other fauna.
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- Objective 3: To ensure the maintenance of distinct settlements and define clear settlement gaps to ensure the continuance of these distinct and separate settlements.
- Objective 4: To challenge environmental risk and promote carbon offsetting by supporting creative thinking and solutions that safeguard and enhance the natural environment. To promote, within the design/build of new developments, features such as permeable driveways / hard standing, provision of green energy, green walls, green roofing, water harvesting and full utilisation of grey water solutions.

- Objective 5: Establish clean environment policies to address issues of pollution and promote wellbeing and improved public health. This will include a ‘beautification’ policy as part of the approach to promote well-being by improving the overall visual enhancement and character of the parish.

2.3 The scope of the SEA

2.3.1 The scope of the SEA is the sustainability issues and objectives that provide the focus of the assessment of the plan and reasonable alternatives. The SEA scope is summarised in a list of these and objectives, known as the SEA framework. Table 2.1 provides the summary SEA framework, whilst Appendix B identifies the full SEA framework to include decision-aiding assessment questions, and the key issues that have informed the development of this framework.

Table 2.1: Summary SEA framework for the DRNP

SEA theme	SEA objective
Biodiversity and geodiversity	Protect and enhance biodiversity and geodiversity.
Climate change	Reduce the contribution to climate change made by activities within the neighbourhood area. Support the resilience of the neighbourhood area to the potential effects of climate change, including flooding.
Landscape	To protect and enhance the character and quality of the immediate and surrounding landscape and villagescape.
Historic environment	Protect, conserve and enhance the historic environment within and surrounding the neighbourhood area.
Land, soil, and water resources	Ensure the efficient and effective use of land. Protect and enhance water quality and use and manage water resources in a sustainable manner.
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Transportation	Promote sustainable transport use and reduce the need to travel.

2.3.2 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.⁵ As such, these authorities were consulted in March 2022. No response was

⁵ These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

received from the Environment Agency. The responses received from Natural England and Historic England are detailed in Table 2.2 below.

Table 2.2: Scoping consultation responses

Consultation response	How the response was considered and addressed
Historic England	
<p>We would refer you to the advice in Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment, which can be found here. This advice sets out the historic environment factors which need to be considered during the Strategic Environmental Assessment or Sustainability Appraisal process, and our recommendations for information you should include.</p>	<p>Comment noted. The Advice Note is considered as part of the plans and policies review in scoping and will be considered as appropriate in subsequent appraisal stages. No changes required.</p>
<p>We would also refer you to Historic England Advice Note 3: Site Allocations and Local Plans. This advice note sets out what we consider to be a robust process for assessing the potential impact of site allocations on any relevant heritage assets. In particular we would highlight the Site Selection Methodology set out on Page 5. This is similar to the methodology used to assess potential impacts on the setting of heritage assets (Good Practice Advice 3) but is focused specifically on the site allocation process and is therefore a more appropriate methodology to employ in this context.</p>	<p>As above.</p>
<p>We would expect a proportionate assessment based on this methodology to be undertaken for any site allocation where there was a potential impact, either positive or negative, on a heritage asset, and the SEA consequently to advise on how any harm should be minimised or mitigated. Advice Note 3 can be found here.</p>	<p>Comment noted. Every effort will be made to undertake a proportionate assessment and advise on how any potential negative effects should be avoided, minimised, or mitigated. No changes required.</p>
<p>Historic England strongly advises that the conservation and archaeological staff of the relevant local planning authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), which should be consulted as part of the SEA process. In addition, they will be able to advise how any site allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider</p>	<p>Comment noted. It is the intention to develop the DRNP and SEA in consultation with the local planning authority. No changes required.</p>

Consultation response**How the response was considered and addressed**

benefits for the future conservation and management of heritage assets.

Natural England

Natural England has no specific comments to make on this Neighbourhood Plan SEA scoping.

Comment noted. No changes required.

3. What has plan-making/ SEA involved up to this point?

3.1 Introduction

- 3.1.1 This chapter focuses on work done to explore and assess reasonable alternatives for the DRNP. More specifically, this chapter presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the Plan, namely the allocation of land for housing development, or alternative sites. Land is currently being identified to meet the requirement for 25 new dwellings in the period up to 2038 as outlined by the emerging South Norfolk VCHAP.
- 3.1.2 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:
- DRNP objectives, particularly housing objectives to provide sufficient and appropriate high-quality housing to meet local needs.
 - Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
 - The delivery of new homes is most likely to have a significant effect compared to the other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.
- 3.1.3 This chapter is structured under three headings which:
- Explain the process of establishing reasonable alternatives
 - Present the outcomes of assessing reasonable alternatives
 - Explain the Parish Council's reasons for selecting the preferred option.

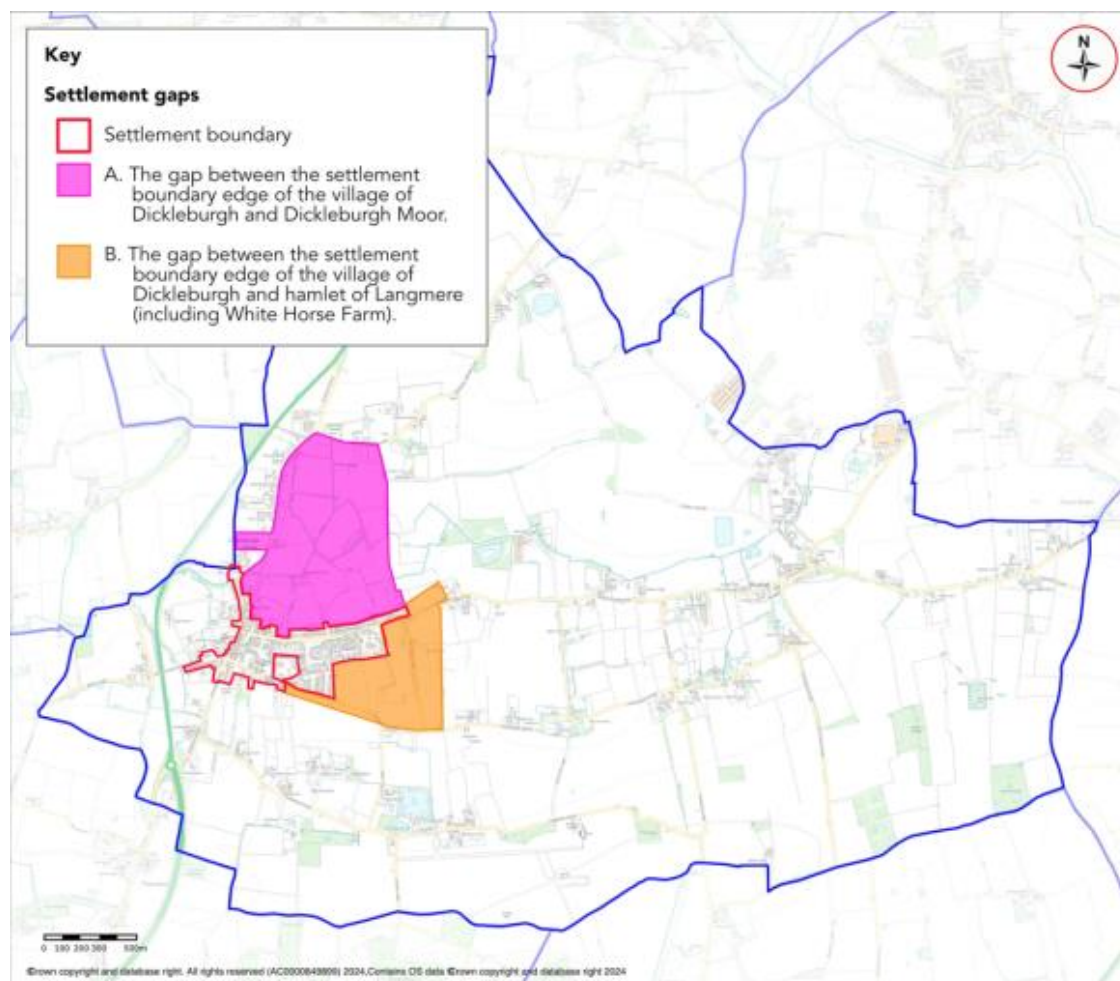
3.2 Establishing reasonable alternatives

- 3.2.1 In line with the regulations, there is a need to present “*an outline of the reasons for selecting the alternatives dealt with*”.⁶ Specifically, there is a need to explain the strategic parameters that have a bearing on the establishment of options (in relation to the level and distribution of growth) and the work that has been undertaken to date to examine site options (i.e., sites potentially in contention for allocation in the DRNP). These parameters are then drawn together in order to arrive at ‘reasonable alternatives’.

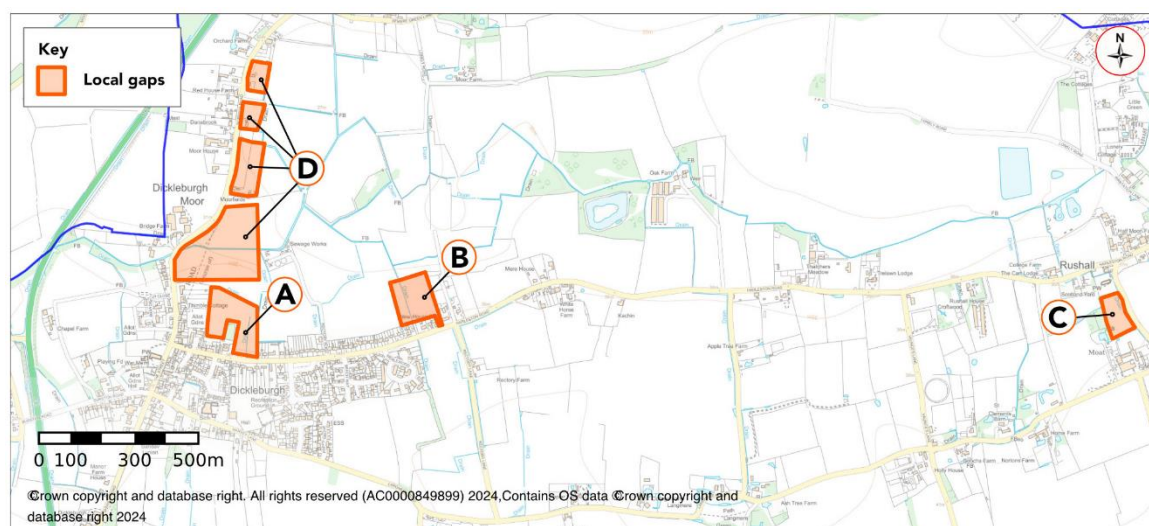
Strategic parameters

- 3.2.2 As discussed in Section 2.2, the GNLP and South Norfolk VCHAP provide the strategic directions for growth, with the expectation that the DRNP will identify suitable land to deliver a minimum of 25 new homes in the period up to 2038.
- 3.2.3 South Norfolk Council have also granted outline planning permission to a development on the land to the West of Norwich Road and to the North of Brandreth Close for 22 homes. As a pre-existing permission, it is counted for separately and does not count towards the indicative housing requirement for 25 new homes.
- 3.2.4 There are further strategic parameters that have a bearing on the direction of future growth. Notably, a key plan objective for the DRNP is to maintain the nucleated aspect of the settlement areas in the neighbourhood area and prevent distinct villages and hamlets from merging or coalescing and prevent isolated buildings or clusters of buildings from being subsumed into larger clusters. On this basis, the DRNP proposes two settlement gaps to the north and east of Dickleburgh village, protecting the gaps between Dickleburgh and Dickleburgh Moor (A) and between Dickleburgh and the hamlet of Langmere (B) – see Figure 3.1.

⁶ Schedule 2(8) of the SEA Regulations

Figure 3.1: Proposed settlement gaps (taken from the DRNP)

3.2.5 In addition to the settlement gaps, the DRNP has also identified 'local gaps' which are sought to be protected from inappropriate development to preserve key views, vistas, and sightlines, and maintain a sense of place, wellbeing, and unique identities. Local gaps differ from settlement gaps as they are smaller in nature and can fall within a settlement area – see Figure 3.2.

Figure 3.2: Proposed local gaps (taken from the DRNP)

- 3.2.6 An additional consideration for future growth in the neighbourhood area is the need to create a buffer zone around the existing Sewage Treatment Works north of Dickleburgh village – referred to as a ‘Cordon Sanitaire’. A buffer of 400m has been identified in consultation with Anglian Water, as depicted in Figure 3.3 which should ensure that future development will not be adversely affected by foul odours or viruses associated with the sewage works.

Figure 3.3: Proposed Cordon Sanitaire around the Sewage Treatment Works (taken from the DRNP)



Site options

- 3.2.7 Table 3.1 lists the sites identified for development within the neighbourhood area. Of these sites, Site numbers 1 to 18 were identified through the GNLPP ‘Call for Sites’ process. Site number 9 has already been granted planning permission (PP) and developed with 22 dwellings now built to the north of Harvey Lane. A further site, Site number 19, also came forward, however the availability of the site for development over the plan period could not be confirmed. Site number 3 has more recently been withdrawn by the developer.
- 3.2.8 In addition to the above, three sites (referred to as N1, N2 and N3 within Table 3.1) have been identified through the South Norfolk VCHAP ‘Call for Sites’, bringing the total number of sites available within the neighbourhood area to 22. The potential for these sites to form reasonable alternatives for the purposes of SEA is explored further.

Table 3.1 Sites identified within the neighbourhood area

Site No.	GNLP No.	Location	Capacity	Site Type
1	0516	West of Norwich Road	25-30	Greenfield
2	0361	Off Ipswich Road West	5-8	Greenfield/ Brownfield
3	0350	West Ipswich Road	15-20	Greenfield
4	0498	East Ipswich Road	35-45	Greenfield
5	0230R	Opposite Bridge Farm	13-21	Greenfield
6	0199	North Rectory Road	80	Greenfield
7	0256	North Rectory Road	30-35	Greenfield
8	0063	South side of Harvey Lane	15-30	Greenfield
9	PP	North Harvey Lane	17-28	Greenfield
10	3017	North Harvey Lane	23-38	Greenfield
11	0389	North Harvey Lane	50-83	Greenfield
12	0257	North Rectory Road	200	Greenfield
13	0258	South Rectory Road	25-30	Greenfield
14	0259	South Rectory Road	20	Greenfield
15	0217	Adjacent Bridge Farm	58-97	Greenfield
16	2083	East Norwich Road	10-15	Greenfield
17	2084	East Norwich Road	5	Greenfield
18	2145	West of Norwich Road	75-125	Greenfield
19	N/A	West of Site 3	45-75	Greenfield
N1	N/A	Town Land Trust Allotments	8	Greenfield
N2	N/A	Kings Head Rear and West	5	Greenfield
N3	N/A	Behind Chenery	10	Greenfield

Establishing the options

- 3.2.9 Considering the long list of sites (Table 3.1), an initial sift has removed the following 7 sites as ‘unreasonable options’ based on their location within the proposed cordon sanitaire (deemed a significant health related issue for future development): Site numbers 5, 6, 7, 12, 15, 16, and 17. Development at these options could be viewed as undermining the work to date with Anglian Water to protect future development and the health and wellbeing of future residents in the neighbourhood area.
- 3.2.10 Also, as previously stated, Site number 9 has gained planning permission and been developed so does not form a reasonable option for additional future growth. Additionally, as Site numbers 3 and 19 cannot be confirmed as

available over the plan period, they are not deemed reasonable alternatives at this stage.

- 3.2.11 Also of note, no suitable access to Site number N1 can be identified at this stage, and on this basis, the site is also deemed not to be a 'reasonable' option for the purposes of SEA.
- 3.2.12 Whilst additional sites (Site numbers 8, 10, 11, 13, and 14) are identified as falling within the proposed settlement gap (B), these sites are not discounted at this stage, recognising that none in isolation would fully erode the proposed gap.
- 3.2.13 Of the long list of 22 sites, 11 are therefore progressed as potentially in contention for allocation in the DRNP – see Figure 3.4 which identifies 'unreasonable' site options in red, and 'reasonable' site options in green.



Figure 3.4: The DRNP site options

- 3.2.14 With a relatively large number of site options remaining for consideration, the assessment considers the merits and constraints associated with the spatial context of development, allowing for grouping of the options and a concise and informative assessment as follows – see Figure 3.5:

- **Option 1:** Development of one or more sites in the north-west of Dickleburgh village (with the choice of Site numbers 1, 18, and N2).
- **Option 2:** Development of one or more sites in the south-west of Dickleburgh village (with the choice of Site numbers 2, 4, and N3).
- **Option 3:** Development of one or more sites in the east of Dickleburgh village (with the choice of Site numbers 13 and 14).
- **Option 4:** Development of one or more sites in the south-east of Dickleburgh village (with the choice of Site numbers 8, 10, and 11).

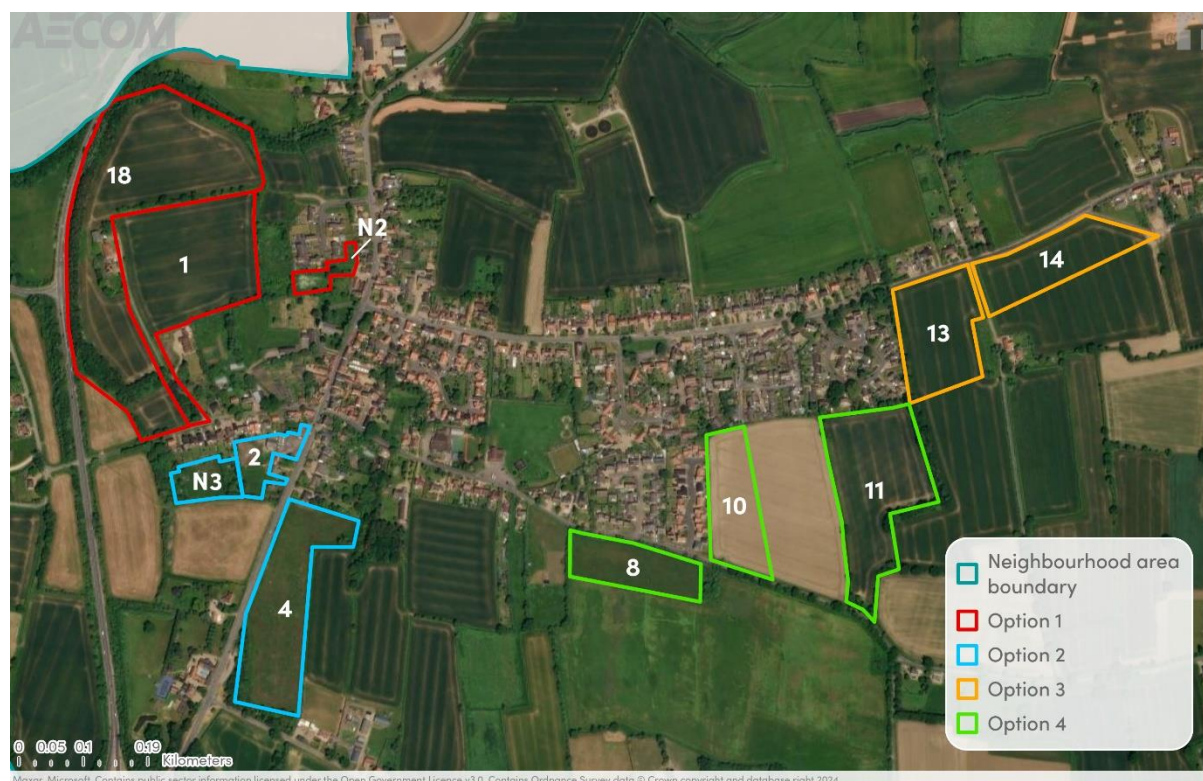


Figure 3.5: The reasonable alternatives options

3.2.15 As previously noted, the options seek to create a concise and informative comparative assessment, exploring the merits and constraints associated with different areas around the village. It is however recognised that a preferred option could ultimately be formed from a hybrid of these choices, with site allocations dispersed across the settlement area. It is deemed that the options assessment can inform decision-making in this respect, whilst remaining accessible for plan-makers and stakeholders.

3.3 Assessing reasonable alternatives

3.3.1 This section presents the outcomes of the assessment of the 4 options established in the previous section (Section 3.2).

3.3.2 In terms of **methodology**, for each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see Table 2.1) as a methodological framework. Effects are stated in a summary table, supported by colour coding. Green is used to indicate significant positive effects, whilst red is used to indicate significant negative effects. Where appropriate neutral effects, or uncertainty will also be noted. Uncertainty is noted with grey shading. Supporting text is provided to indicate the reasoning behind the summarised and predicted likely effects.

3.3.3 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

3.3.4 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of

preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best.

3.3.5 Finally, it is important to note that effects are predicted considering the criteria presented within Regulations.⁷ So, for example, account is taken of the duration, frequency, and reversibility of effects.

3.3.6 To reiterate, the following 4 options are being assessed (as seen Figure 3.5):

- **Option 1:** Development of one or more sites in the north-west of Dickleburgh village (with the choice of Site numbers 1, 18, and N2).
- **Option 2:** Development of one or more sites in the south-west of Dickleburgh village (with the choice of Site numbers 2, 4, and N3).
- **Option 3:** Development of one or more sites in the east of Dickleburgh village (with the choice of Site numbers 13 and 14).
- **Option 4:** Development of one or more sites in the south-east of Dickleburgh village (with the choice of Site numbers 8, 10, and 11).

⁷ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Table 3.2: Summary of likely effects and ranking of reasonable alternatives

SEA theme	Outcome dimension	Option 1 (north-west)	Option 2 (south-west)	Option 3 (east)	Option 4 (south east)
Biodiversity and geodiversity	Significant effect?	No	No	No	No
	Rank	4	3	2	1
Climate change	Significant effect?	Yes - negative	No	No	No
	Rank	4	2	1	3
Landscape	Significant effect?	No	No	No	No
	Rank	4	=1	3	=1
Historic environment	Significant effect?	Yes - negative	Yes - negative	Uncertain	No
	Rank	4	3	2	1
Land, soil, and water resources	Significant effect?	No	No	No	No
	Rank	4	=1	=1	=1
Community wellbeing	Significant effect?	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	1	2	4	3
Transportation	Significant effect?	No	No	Yes - negative	Yes - negative
	Rank	=1	=1	=3	=3

Biodiversity and geodiversity

- 3.3.7 None of the options fall within any international or national biodiversity designations or any associated Site of Special Scientific Interest (SSSI) Impact Risk Zone (IRZ). Consequently, none of the options are expected to affect nearby international or nationally designated sites.
- 3.3.8 Option 1 (Site 18) and Option 2 (Site N3) include areas designated as Biodiversity Action Plan (BAP) Priority Habitats, specifically deciduous woodland and traditional orchard, respectively. Development could potentially disturb species in these habitats, though habitat retention may be possible if development occurs.
- 3.3.9 In terms of the Living Environment Habitat Map, Options 2, 3, and 4 are primarily made up of a combination of Arable and Horticultural land, as well as Acid, Calcareous and Neutral Grassland. Option 1 also has this combination of land coverage, as well as Dwarf Shrub Heath covering a

large part of site 18 and therefore would result in the greatest loss of habitat types. However, it is noted that some of these habitat types could be retained, given that the full capacity of Option 1 is unlikely to be delivered, as it exceeds the required housing need.

- 3.3.10 The entire neighbourhood area is designated a priority area for Country Stewardship (CS) measures addressing Lapwing habitat issues. In this respect, all options have the potential to disturb this habitat.
- 3.3.11 Dickleburgh Moor is home to numerous migrant wading birds, including the lapwing (*vanellus vanellus*), as well as several birds of prey, and the periphery of the Moor is one of the few nesting sites of the endangered turtle dove (*Streptopelia turtur*) in the upper Waveney valley catchment. The Moor is also home to numerous mammals, including water voles (*Arvicola amphibius*), Eurasian otter (*Lutra lutra*) and water shrews (*Neomys fodiens*), as well as several amphibian species. Moreover, Dickleburgh Moor is home to the Suffolk Punch, which is the oldest English breed of working horse, and is now a critically endangered species.⁸ In terms of plant species, the Moor provides a habitat for the locally scarce Nodding bur marigold (*Bidens cernua* L.) and the nationally scarce Pedunculate club rush (*Bolboschoenus laticarpus*). The Moor is also part of the Otter Trust's Black Poplar project which aims to conserve the native population of Black Poplar trees in Norfolk.
- 3.3.12 As Options 1 and 3 are in closest proximity to the Moor, these options have the greatest potential to disturb the aforementioned species. However, it is noted that the full capacity of Option 1 is unlikely to be delivered as it exceeds the required housing need, therefore, directing development to the southern half of the site could reduce impacts in this respect.
- 3.3.13 Overall, Option 1 is ranked least favourably due to the presence of deciduous woodland, multiple habitat types, and its proximity to Dickleburgh Moor, increasing its vulnerability to disturbance. Nonetheless, significant negative effects are not anticipated, as these constraints could largely be managed by directing development to the southern site area. Option 2 ranks less favourably than Options 3 and 4 due to its traditional orchard BAP Priority Habitat, though impacts could be minimized by avoiding development on or near this habitat. Option 4 ranks marginally better than Option 3 as it is located further from Dickleburgh Moor. No significant effects are anticipated under any option.

Climate change

- 3.3.14 In terms of climate change mitigation, there is limited potential to meaningfully differentiate between the options in relation to reducing contributions to climate change as no site is identified for any significant opportunities to improve the baseline. Although accessibility to Dickleburgh's limited services could serve as a ranking factor, this is addressed under the transportation SEA topic. Given the rural context, all options are likely to lead to car dependency for accessing services in higher-tier settlements.
- 3.3.15 It is also considered that there are negligible differences in terms of the ability to achieve ambitious building emissions standards in support of

⁸ The Suffolk Punch Trust (no date): 'Home', [online] available to access via [this link](#)

decarbonisation given that all options are relatively small-scale. However, economies of scale could lead to opportunities to achieve a high building standard, and in this respect, Option 1, which has the largest capacity for dwellings, and then Option 3, could perform marginally better than the remaining options. Nevertheless, it is noted that the full capacity of the site is unlikely to be delivered as it exceeds the required housing need.

- 3.3.16 Regarding flood risk, the northern boundary of site 18 (Option 1) lies adjacent to the Dickleburgh Stream, within Flood Zone 3, making this option less favourable than the other options, all of which are within Flood Zone 1 with a very low fluvial flood risk. Again, development in Option 1 could be directed to the southern half to mitigate flood risks.
- 3.3.17 Surface water flood risk is also primarily concentrated around the Dickleburgh Stream and related drainage channels. Option 1 is more constrained by medium to high surface water flood risk along its northern and western boundaries on site 18, as well as the eastern boundary of site 1. Most of site 8 within Option 4 also faces high surface water flood risks; however, development could proceed on its other two sites to avoid these areas and the use of sustainable drainage systems could mitigate risks. Sites 2 and N3 within Option 2 face low flood risks.
- 3.3.18 There are areas of medium to high risk of surface water flooding along most roads in the settlement area. In this respect, an increase in non-permeable surfaces, arising from development through all options, has potential to increase surface water flooding. Hence, the incorporation of Sustainable Drainage Systems (SuDS) into the design of developments will be key.
- 3.3.19 Overall, Option 1 is ranked least favourable due to its location adjacent to Dickleburgh Stream, which significantly increases the risk of fluvial flooding along its northern boundary, and in this respect, **significant negative effects** are predicted for this option (pre-mitigation). However, it is noted that this could be mitigated to some degree by directing development to the southern half of the site. Option 4 is ranked the next least favourable due to the high level of surface water flood risk associated with one of the three sites within the option, site 8, though significant negative effects are considered unlikely for this option given the available mitigation. Option 2 is ranked second most favourable due to the low level of flood risk associated with sites N3 and 2, and Option 3 is considered to be most favourable in this respect. No significant effects are anticipated under Options 2 or 3.

Landscape

- 3.3.20 None of the options are in or in proximity to a nationally protected landscape, thus, are unlikely to have any impact on such landscapes.
- 3.3.21 Site 2, within Option 2, is partially brownfield land. Except for this site, all the sites are greenfield; however, it must be noted that there is a limited availability of brownfield land within the neighbourhood area. In this respect, development of greenfield land is largely unavoidable to accommodate growth.
- 3.3.22 The sites in Option 1 are relatively larger but sit at a lower elevation than the main settlement of Dickleburgh village to the east, likely resulting in a reduced visual impact on the village setting. Option 2 includes primarily

smaller sites but would extend the settlement boundary southward if site 4 is developed. Option 3 consists of sites in the east of the settlement area, in an area with extensive views north across the landscape. Option 4 extends the settlement boundary to the south and south-east. Options 2, 3, and 4 are generally at a similar elevation to Dickleburgh village to the north, making them potentially more prominent in the landscape and thus more likely to impact the village setting.

- 3.3.23 Option 1 is in close proximity to Dickleburgh Moor and at a lower elevation than the rest of the neighbourhood area. In this respect, the option has the potential to impact the setting of the Moor. The northern part of Option 1 (site 18) is most likely to impact views onto the Moor, given that it projects the furthest north and is relatively exposed to the wider landscape. However, it is noted that there is an existing tree line north of the site, which if retained, could help mitigate impacts. Furthermore, given that the full capacity of Option 1 is unlikely to be delivered as it exceeds the required housing need, this could be mitigated to some degree by directing development to the southern half of the site.
- 3.3.24 Overall, Option 1 is ranked least favourably due to its size, resulting in the greatest loss of greenfield land, and its proximity to Dickleburgh Moor, though no significant effects are anticipated given the Moor is not nationally designated. It is also noted that this could be mitigated to some degree by only developing the southern half of the site. Due to this, the loss of greenfield land is likely to be limited to only part of the site. Option 3 is ranked the least favourable after this, due to the extensive landscape views. Options 2 and 4 are generally ranked on par. No significant effects are anticipated under any Option.

Historic environment

- 3.3.25 None of the options contain designated heritage assets; however, site N2 of Option 1 is located directly adjacent and in proximity to a number of Grade 2 listed buildings. Moreover, site N2 is located in close proximity to Grade I listed building 'Church of All Saints'. Further, site 2 of Option 2 is located south of a large cluster of listed buildings along The Street and is in particularly close proximity to Grade II listed buildings 'East Bank' and 'Housing Opposite and Immediately East of East Bank'. In addition, Site 4, also Option 2, is located adjacent to Grade II listed building 'Manor Farmhouse' and Grade II* listed building, 'Manor House'. In this respect, Options 1 and 2 have the greatest potential to impact the setting of listed buildings in the neighbourhood area.
- 3.3.26 Under Option 1, site N2 is located within Dickleburgh Conservation Area, and site 1 is located adjacent to the area, to the northwest. Development within the conservation area and directly adjacent to the border of the area has the potential to impact negatively on historic assets. Site 2 of Option 3 is located adjacent to the south of the Dickleburgh Conservation Area border.
- 3.3.27 Dickleburgh Moor also has historic value, and recently an early Bronze Age trackway, believed to date back to between 1775 and 1623BC, was discovered on the Moor. The trackway is of national significance as it represents the second oldest Bronze Age wooden structure in Norfolk, and the only trackway of this period in England. There is potential for the

trackway to be granted scheduled monument status, and therefore any development that will lead to disturbance of the land and its hydrology may not be permitted. Whilst it cannot be confirmed at this stage whether development at Options 1 or 3 would cause disturbance, the options are in closest proximity to Dickleburgh Moor, and in this respect, have the greatest potential to lead to disturbance.

- 3.3.28 Overall, Option 1 is considered to be ranked least favourably as site N2 is located within the Dickleburgh Conservation Area, and adjacent to a number of listed buildings. Therefore, this option is considered to have the potential for **significant negative effects**. However, it is noted that the full capacity of Option 1 is unlikely to be delivered, as it exceeds the required housing need. In this respect, development could be directed to the part of the site that will have the lowest impact on the historic environment. Whilst the proximity of Options 1 and 3 to Dickleburgh Moor is recognised, uncertainty is noted regarding significant effects as further studies will need to be undertaken to determine whether development of these options will result in disturbance to the archaeological assets found in the Moor. Option 2 is considered to be the next least favourable, due to the location adjacent to the conservation area, and multiple listed buildings – and due to this, is considered likely to lead to **significant negative effects**. Option 4 is considered to be least constrained with regard to historic environment and is therefore ranked most favourable, with no significant effects anticipated.

Land, soil, and water resources

- 3.3.29 In terms of the Agricultural Land Classification (ALC), all options are underlain by Grade 3 (Good to Moderate) agricultural land. However, in the absence of a detailed assessment at this location, it is currently not possible to determine whether this land is Grade 3a (i.e. higher quality) or Grade 3b (poorer quality). In terms of Best and Most Versatile (BMV)⁹, all options have a Moderate (20 to 60% area BMV) likelihood of being underlain by BMV agricultural land.
- 3.3.30 Concerning water resources, the neighbourhood area falls within the 'Norfolk Rural South' Water Resource Zone (WRZ). This WRZ is projected to experience a 9% increase in water demand between 2017 and 2045 due to population growth. However, Anglian Water's Water Resource Management Plan (WRMP) indicates that this WRZ has no climate change vulnerability, including in cases of severe drought, up to 2045.
- 3.3.31 The neighbourhood area lies within the Waveney Operational Catchment, specifically in the catchment of the Dickleburgh Stream Water Body. Currently, the stream's water body is classified as having a 'moderate ecological status.' Regarding physio-chemical quality, the Dickleburgh Stream scored 'poor' for ammonia and phosphate levels, often stemming from agricultural practices (e.g., fertiliser use) and household wastewater. Consequently, managing diffuse pollution at new developments will be essential to prevent worsening the ecological status of Dickleburgh Stream via wastewater runoff. Option 1 is most likely to impact Dickleburgh Stream, as it lies adjacent to its northern boundary.

⁹ BMV land is defined as land which falls in ALC grades 1 to 3a.

- 3.3.32 For Groundwater Source Protection Zones (SPZs), all options fall within a Zone III (Total Catchment) SPZ. The entire neighborhood area also lies within the River Waveney Nitrate Vulnerable Zone (NVZ) for surface water and the Anglian Waveney Drinking Water Safeguarding Zone (DWSZ) for surface water.
- 3.3.33 Whilst all the options perform relatively equally, Option 1 has been ranked slightly less favourably. This is due to the site's potential to negatively impact the ecological status of Dickleburgh Stream. Given that wastewater runoff will likely be suitably managed on-site, significant effects are not anticipated for this option. All options will likely lead to the loss of some BMV agricultural land; however, given the rural nature of the neighbourhood area, this is largely unavoidable. No significant effects are therefore anticipated under any of the options.

Community wellbeing

- 3.3.34 While all options will meet the identified housing need of the neighbourhood area, Option 1 performs most favourably as it has the largest capacity, allowing for a greater number of homes, including affordable units and housing suitable for young families and the elderly to support independent living. It is noted, however, that the full capacity of the site is unlikely to be developed, as it exceeds the required housing need.
- 3.3.35 Given economies of scale, it is also considered that Option 1 may lead to greater positive effects by delivering more infrastructure alongside housing development at the site. This could include green infrastructure and greater opportunities for net gains in biodiversity, supporting community wellbeing. Given that the full capacity of the site is unlikely to be delivered, there is likely to be space on site for these opportunities to be realised.
- 3.3.36 Regarding proximity to Local Green Spaces (LGSs), as identified in the draft DRNP, all options are within walking distance of Dickleburgh Village Green (H), The Churchyard of All Saints Church (J), the field and former allotment area behind Dickleburgh Church (M), and the green around the Gables, between the Gables, number 43, and the water treatment plant (N).
- 3.3.37 Growth under Options 1, 2, and 4 would offer broadly similar walkable access to the limited range of services in the village, including Dickleburgh Primary School, Dickleburgh Park, and Dickleburgh Village Centre. However, Option 3 is slightly further afield from these facilities, and both Options 3 and 4 are not currently served by safe footpaths for pedestrian access.
- 3.3.38 Whilst all options perform relatively equally, Option 1 is ranked most favourable as it has the greatest potential to deliver affordable homes and new infrastructure, including green infrastructure. However, all options are considered likely to lead to **significant positive effects** as they meet the required housing need of the neighbourhood area and are assumed to deliver a proportion of affordable homes. Option 2 ranks marginally better than Option 4 given the existing footpath access to local facilities. Option 3 ranks the least favourably given its further distance from local facilities coupled with lack of existing safe footpath/ pedestrian access.

Transportation

- 3.3.39 All options are considered likely to require infrastructure improvements to accommodate highways access and ensure safe pedestrian access. Proposals under any option will need to be discussed further with the Highways Authority. This is a particular concern for Options 3 and 4 which lack suitable existing footpath access.
- 3.3.40 It is noted that Option 2, if not properly managed, has potential to worsen congestion and lead to road safety issues due to access being proposed on the Ipswich Road. However, appropriate transport planning for the site can ensure that any potential issues are addressed in advance.
- 3.3.41 Given the limited local services and facilities all options will likely lead to a degree of car dependency. Sustainable travel options are limited in Dickleburgh village, with the only two bus services, number 2 (Diss to Norwich) and number 584 (Pulham Market to Diss), stopping outside All Saints Church, which is in walking distance to all options (albeit with a lack of suitable footpath access noted at Options 3 and 4). Whilst some residents may choose to utilise these services, it is likely that many will still opt to use private cars.
- 3.3.42 In terms of Public Rights of Way (PRoW), public footpath Dickleburgh and Rushall FP3 passes along the northern boundary of Option 1, heading southeast towards Dickleburgh village. There is also Dickleburgh and Rushall FP1, which is located directly opposite Option 3, on the northern boundary. If developed, it will be important that this public footpath is maintained, or even enhanced.
- 3.3.43 Overall, Options 1 and 2 are considered to rank more favourably than Options 3 and 4, given the existing active travel opportunities/ pedestrian access. Given the relatively small-scale growth proposed for the neighbourhood area, there is the potential for **significant negative effects** under Options 3 and 4 as it is considered unlikely that they could deliver any substantial transport infrastructure improvements such as new pavements to support safe pedestrian access.

Conclusions

- 3.3.44 All options are considered likely to lead to **significant positive effects** regarding the community wellbeing SEA topic. This is because all options meet the required housing need of the neighbourhood area, including an assumed proportion of affordable homes.
- 3.3.45 **Significant negative effects** are considered likely in relation to fluvial flood risk for Option 1, given its proximity to Dickleburgh Stream. **Significant negative effects** are also expected in relation to the historic environment for Options 1 and 2 given the proximity of these options to listed buildings and the Dickleburgh Conservation Area. **Significant negative effects** are also considered likely under Options 3 and 4 in relation to transportation given the lack of existing footpath access and the viability of being able to improve this situation through the small-scale growth expected. Some **uncertainty** is also noted under Option 3 in relation to the historic environment, reflecting the need for further archaeological investigations to inform the potential effects of development in this area.

3.4 Developing the preferred approach

- 3.4.1 The Parish Council outline below their reasoning behind the preferred approach to allocate Site number 1 in the north-west of Dickleburgh village (assessed as part of Option 1).

“The Steering Group met in June 2019 to assess all available sites. All sites put forward by developers were subject to a Suitability Assessment (SA) created by the Steering Group and based upon the South Norfolk HEELA. Four sites emerged from that process as possible sites for development – sites 1, 2, 3 and 4 – and the highest scoring site was site 1. Sites 1 and 4 were deemed able to deliver the 25 homes on a single site. All other sites failed the SA tests.

There then followed a series of meetings to test the sites and arrive at an agreed preferred site/ sites. It was agreed on 17th September 2020 that the final sites going forward would be sites 1 and 2.

With regard to site 2, the proposals put forward to the Steering Group do not conform to rurality, parking, and density requirements. Moreover, densities, as indicated by the developer, were deemed unacceptable. Specifically, the developer declared that they would only be interested in developing the site if they were given additional permissions to extend the site to include the area referred to as N3. This request was rejected, and as a result, the developer withdrew their interest on 22nd September 2021.

In light of the above, site 1 became the preferred site, providing that the aspects below can be met:

- *Cordon sanitaire (400 metres) – no building within the limits of the cordon sanitaire.*
- *Heritage views maintained.*
- *Heritage sites protected.*
- *Views and vistas maintained; in particular, views from the Norwich Road across to the A140, views to the church, and views from the church.*
- *Footpath 3 – a green walk (path) which should remain a green walk (path).*
- *Rurality.*
- *Flooding of the Norwich Road – flooding regularly occurs; the site must not exacerbate this issue.”*

4. What are the SEA findings at this stage?

4.1 Introduction

4.1.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current 'submission' version of the DRNP. This chapter presents:

- An appraisal of the current version of the DRNP under the 7 SEA theme headings.
- Consideration of cumulative effects; and
- The overall conclusions at this current stage and recommendations for the next stage of plan-making.

4.2 Methodology

4.2.1 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see Table 3.1) as a methodological framework.

4.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.

4.2.3 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the assessment as appropriate.

4.3 Proposed DRNP policies

4.3.1 The DRNP proposes 20 policies to guide development in the neighbourhood area, as listed in Table 4.1.

Table 4.1: Proposed DRNP policies

Policy Reference	Policy Name
Policy DR1	Heritage
Policy DR2	Archaeology
Policy DR3	Views and vistas
Policy DR4	Settlement gaps
Policy DR5	Local gaps
Policy DR6	Heritage ditches, hedges, and verges
Policy DR7	Design
Policy DR8	Local housing need
Policy DR9	Valued community assets
Policy DR10	Parking for the building of new houses or conversions
Policy DR11	Water harvesting
Policy DR12	Flooding and surface water drainage issues
Policy DR13	Cordon Sanitaire
Policy DR14	Carbon offsetting for new builds
Policy DR15	Local traffic generation
Policy DR16	Walking, cycling, and horse riding
Policy DR17	Green corridors and Biodiversity Net Gain
Policy DR18	Local Green Spaces
Policy DR19	Dark skies
Policy DR20	Allocation

4.4 Overview of the plan

4.4.1 The DRNP proposes one development site at the land 'West of Norwich Road' (Policy DR20)– identified as Site 1 through the assessment of alternative options (see previous chapter). This one site is expected to deliver the 25 homes identified as a requirement to meet local housing needs. The wider policy framework is grouped by the four themes of heritage (Policies DR1 – DR6), housing (Policies DR7 – DR14), transport (Policies DR15 and DR16), and environment (Policies DR17 – DR19).

4.5 Appraisal of the plan

Biodiversity and geodiversity

- 4.5.1 There are no internationally or nationally designated sites for biodiversity in the neighbourhood area, and the nearest nationally designated site – Gawdyhall Big Wood Harleston Site of Special Scientific Interest (SSSI) – is 3.6 kilometres away from the boundary of the neighbourhood area. Whilst the Impact Risk Zone (IRZ) for this SSSI, and others within the vicinity of the neighbourhood area, intersect the neighbourhood area, these only capture residential/ rural residential development of 50 units or more, which exceeds the 25 homes that the DRNP is proposing to deliver over the plan period.
- 4.5.2 AECOM completed a Habitat Regulations Assessment (HRA) for the DRNP in May 2022, which found that two European sites within 10 kilometres of the neighbourhood area required further consideration; these are the Waveney and Little Ouse Valley Fens SAC and Redgrave & South Lopham Fens Ramsar. The potential impact pathways associated with development in the neighbourhood area are recreational pressure, water quantity, level and flow, water quality and atmospheric pollution. It was concluded that likely significant effects regarding these impact pathways could be screened out from Appropriate Assessment, with the exception of recreational pressure. However, since there is already a county-wide mitigation strategy to address recreational pressure to which all net new housing must contribute, it was possible to conclude that the DRNP would not have an adverse effect on European sites either alone or in combination with other plans and projects. Policy DR7 (Design) further requires development to ensure due regard to the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy.
- 4.5.3 In terms of BAP priority habitats, the neighbourhood area contains several areas of deciduous woodland (one of which is also classed as ancient woodland), as well as smaller areas of traditional orchard. An area of deciduous woodland is approximately 80 metres northwest of the proposed site allocation and there is also a small area of traditional orchard approximately 70 metres south. Dickleburgh Moor also lies north of the proposed development area, and nearby is Langmere Green County Wildlife Site as well as areas of common land (off Langmere Road and St Clement's Common). However, there is existing development between the site and these habitats which reduces the potential for direct impacts.
- 4.5.4 The Site Allocation Policy (Policy DR20) contains criteria for development that will help to support biodiversity on site, including through the on-site provision of wildlife corridors, and protection and enhancement of a landscape belt and existing trees and hedgerows on site.
- 4.5.5 The DRNP further proposes 3 environment policies (Policies DR17, DR18, and DR19) which will support biodiversity in and around the neighbourhood area. These policies seek to introduce and protect green corridors, reiterate the need for Biodiversity Net Gain in development, identify and protect Local Green Spaces, and protect dark skies. Of note, Policy DR17 seeks to ensure that development adheres to the Norfolk Local Nature Recovery Strategy, recognising this as an important strategy to facilitate nature recovery at the regional landscape scale. The policy outlines ways in which nature recovery and net gains could be achieved and requires a detailed and budgeted plan in development that evidences long-term net gains.

- 4.5.6 Overall, **minor positive effects** are considered most likely with respect to the biodiversity and geodiversity SEA theme. The policy framework seeks to protect priority species and habitats, enhance the biodiversity value of the neighbourhood area, and deliver at least 10% net gain amongst other things. The spatial strategy is also considered unlikely to adversely affect nearby designated habitats.

Climate change

- 4.5.7 With regards to climate change mitigation, the DRNP seeks to influence emissions through development design and carbon offsetting. Specifically, Policy DR7 (Design) requires the use of local and sustainable materials in development adhering to 'Secure by Design' principles. Policy DR11 also expects all new development to make use of on-site grey water harvesting and maximise water efficiency. Of note, Policy DR14 outlines the aim for the parish to work towards becoming a low carbon community. For new developments, the policy outlines expected climate change mitigation measures that include a 'whole life carbon assessment', thermally efficient building materials, biodiversity enhancements, renewable energy installations, electric car charging points, and active travel connections.
- 4.5.8 The proposed site allocation (Policy DR20) is suitably located to provide access to the parish services and facilities, promoting active travel in local journeys. This is supported by Policy DR16 which seeks to enhance and join up active travel networks in new development. Furthermore, Policy DR10 also reiterates the requirement for the provision of electric car charging points in development of 3 or more homes, which will assist in facilitating more sustainable travel. The site allocation policy (Policy DR20) further encourages sustainability improvements over and above those set by Building Regulations.
- 4.5.9 With regards to climate change adaptation, the DRNP proposes Policy DR12 which requires mitigation in development to avoid any increase of flood risk and achieve lower than greenfield runoff rates. This is particularly important in light of the site allocation which is constrained by an area of medium to high surface water flood risk in the north-east part of the site. The north-east boundary also lies within Flood Zone 3 associated with Dickleburgh Stream. Development will ultimately need to mitigate the associated flood risk impacts within and surrounding the site, particularly bearing in mind future flood risk. The requirement for biodiversity net gain on-site (Policy DR17), and sustainable drainage solutions that incorporate nature-based solutions (Policy DR12) should also assist in bolstering climate resilience.
- 4.5.10 It is recognised that mitigation will be required to avoid negative effects arising in future development of the neighbourhood area, and the DRNP proposes multiple policies that seek to ensure such mitigation is delivered alongside development. The DRNP also proposes connected development and policies that seek to improve the sustainability performance of new development. On this basis, no significant deviations from the baseline are anticipated, and **broadly neutral effects** are considered most likely overall.

Landscape

- 4.5.11 The proposed site allocation (Policy DR20) is at a lower elevation than the main settlement of Dickleburgh village to the southeast, and in this respect, the impact of development on the setting of the village is unlikely to be significant if appropriate design and layout are considered during the design stage. There are multiple policies proposed in the DRNP which will influence the design and layout of development and assist in mitigating its impact on the landscape. The site allocation policy itself (Policy DR20) stipulates that development must demonstrate a coordinated approach to design, layout, landscaping, and infrastructure provision through a site masterplan. The masterplan would need to preserve the rural nature of the site through the provision of wildlife corridors and enhance a landscape belt along three of the four boundaries of the site. Furthermore, the site allocation policy seeks to retain existing trees and hedgerows on site as well as the existing footpath.
- 4.5.12 Policy DR7 identifies design criteria for development that seek to reflect the rural nature of the parish and add to the beautification of the locality. The proposed criteria outline principles for building heights, densities, materials, privacy, public spaces, and garden sizes. Policy DR3 also identifies and protects numerous important local views and vistas, particularly towards Dickleburgh Moor, requiring development to safeguard the integrity and local importance of these views.
- 4.5.13 Of note, the DRNP proposes two settlement gaps (Policy DR4) designed to maintain the distinct settlement areas within the parish by retaining open and undeveloped areas of the landscape in between them. A further seven local gaps are also identified (Policy DR5) as small areas between buildings that maintain a sense of place, wellbeing, and the unique identity of the parish. Development within these areas would only be supported when no alternative development site can be found within the parish, and the stipulations seek to ensure that development would not compromise (either individually or cumulatively) the gaps. The proposed site allocation does not fall within any of the identified gaps.
- 4.5.14 Three environment policies are also proposed which will help to retain and enhance the landscape within and surrounding the parish. This includes by identifying and protecting green corridors (Policy DR17), making provisions for biodiversity net gain (Policy DR17), identifying and protecting Local Green Spaces (Policy DR18), and limiting the impact of light pollution on existing dark skies (Policy DR19).
- 4.5.15 Overall, the proposed greenfield development is considered likely to lead to **minor negative effects** for the landscape, although these effects are minimised by the proposed policy framework and reflect a lack of brownfield alternatives within the parish. **Minor positive effects** are also expected from the wider policy provisions that provide long-term protection for settlement gaps, local gaps, green corridors, and Local Green Spaces.

Historic environment

- 4.5.16 Dickleburgh has a rich historic environment, which is recognised through 86 listed buildings and the Dickleburgh Conservation Area, which covers the

western part of the settlement of Dickleburgh. This is in addition to 286 heritage assets listed on the Norfolk HER¹⁰.

- 4.5.17 The proposed site allocation (Policy DR20) borders Dickleburgh Conservation Area to the southeast, and therefore has potential to impact the setting and significance of the conservation area, including the large cluster of listed buildings along Norwich Road/ The Street. In response to this, the site allocation policy (Policy DR20) requires a detailed heritage statement in development proposals that identifies the potential impacts on heritage assets, recognising that the area contains pre-Roman and Roman archaeology.
- 4.5.18 Additional heritage specific policies are proposed: Policies DR1 and DR2. Policy DR1 requires all heritage assets are conserved in a manner appropriate to their significance, including non-designated assets of village scape significance. The policy identifies an important 'historic core' comprised of the Moor, a site of an Ice Age glacier, Stone Age/ Bronze Age settlement, sunken Bronze Age pathways, evidence of early Bronze Age boats, pre-Roman archaeological finds, failed Roman Road, the Pye Road (Roman Road), and Grade I and Grade II Listed Buildings outside the Conservation Area. Policy DR2 reflects rich archaeological finds in the parish, requiring all development to identify and preserve any findings of archaeological importance and have them registered. In addition, Policy DR3 seeks to protect important views and vistas, including the sightlines around St Mary's Church at Rushall. Of note, Policy DR6 links to an 1884 map of Dickleburgh and Rushall identifying ditches, hedges, and verges that still exist today. The policy seeks to protect these and enhance this network in new development.
- 4.5.19 Overall, the new development proposed is likely to affect the historic environment given its proximity to key assets, however the policy framework seeks to mitigate and minimise these impacts, and as a result, **minor negative effects to broadly neutral effects** are considered most likely, whilst recognising some **uncertainty** remains in the absence of detailed development proposals for the site.

Land, soil, and water resources

- 4.5.20 The neighbourhood area has a moderate likelihood (20-60%) of being underlain by Best and Most Versatile (BMV) agricultural land. In this respect, development in the neighbourhood area is unlikely to lead to the loss of a large area of productive agricultural land, particularly given the scale of development proposed through the DRNP (25 homes at one site).
- 4.5.21 In terms of water resources, the Dickleburgh Stream passes through the middle of the neighbourhood area. As shown on the Environment Agency's Catchment Data Explorer¹¹, the most recently completed water quality assessment undertaken in 2019 classifies the Dickleburgh Stream as having a 'moderate ecological status'. The northeastern boundary of the proposed site allocation (Policy DR20) is adjacent to Dickleburgh Stream, and therefore it will be important that any water discharged from the site is managed appropriately so that it does not adversely affect the ecological

¹⁰ Norfolk County Council (2022): 'Historic Environment Record', [online] available to access via [this link](#)

¹¹ Environment Agency (2022): 'Dickleburgh Stream Water Body', [online] available to access via [this link](#)

status of the stream. In relation to this, Policy DR12 outlines that sustainable drainage systems should demonstrate mitigation in relation to water quality.

- 4.5.22 The proposed site allocation (Policy DR20) falls within a Zone III (Total Catchment) Source Protection Zone (SPZ). It also falls within the River Waveney Nitrate Vulnerable Zone (NVZ) and a Drinking Water Safeguarding Zone (DWSZ) for Surface Water, as does the entire neighbourhood area. However, it is recognised that development of the site is unlikely to significantly impact these designations given its small scale. In addition, the protection provided by these designations should ensure that development within them does not adversely affect water resources in this area.
- 4.5.23 Policy DR13 (Cordon Sanitaire) is in place to ensure no new development takes place within 400 metres of the sewage works within the neighbourhood area. With respect to the spatial strategy, the northeastern part of the proposed site allocation (Policy DR20) intersects with the cordon sanitaire around the sewage works located to the northeast of the site. However, the avoidance of development within this area of the site should avoid negative effects arising, which is supported by the site allocation policy (Policy DR20) which requires a landscape belt be provided in this area.
- 4.5.24 Overall, no significant effects are anticipated with respect to the land, soil and water resources SEA topic. Whilst the allocated site will lead to the loss of greenfield land, it is recognised that this is largely unavoidable given the lack of available brownfield alternatives. The spatial strategy delivers development adjacent to the Dickleburgh Stream and in sensitive water environment, however the policy framework provides mitigation to minimise adverse effects arising. On this basis, **minor negative effects** are concluded as most likely.

Community wellbeing

- 4.5.25 The neighbourhood area is within the South Norfolk 014D Lower Super Output Area (LSOA), which is amongst the 50% least deprived neighbourhoods in terms of overall deprivation. However, in terms of the 'Living Environment Deprivation Domain', this LSOA is amongst the 10% most deprived neighbourhoods in the country. This shows that the quality of the local environment is poor in the neighbourhood area when compared to England.
- 4.5.26 The proposed site allocation (Policy DR20) performs well by delivering against the identified housing need for 25 new homes. By promoting growth in the neighbourhood area, the spatial strategy should help improve the local environment, however the extent of this will depend on the community infrastructure delivered alongside development. The proposed site allocation also performs well by supporting sustainable access (including active travel) to local services and facilities in the village of Dickleburgh, as well as Local Green Spaces (LGSs). Policy DR8 (Local Housing Needs) further requires that development of ten or more homes provide a range and mix of housing sizes and types that meet the needs identified in the most up to date Strategic Housing Market Assessment and as expressed through community consultation.

- 4.5.27 More broadly, Policy DR9 identifies and seeks to protect valued community assets that support the resident population. This includes the churches, the village centre, The Reading Room, play areas, Dickleburgh Church of England Primary Academy, allotments, and the Village Store and Post Office. This is supported by Policy DR16 which seeks to protect and enhance the network of active travel routes in the parish and ensure local connectivity, and Policy DR18 which designates and protects Local Green Spaces.
- 4.5.28 Finally, Policy DR13 (Cordon Sanitaire) identifies a buffer around the Sewage Works to protect future residents from foul odours and viruses associated with its operations, providing long-term support for resident health and wellbeing.
- 4.5.29 Overall, **significant positive effects** are anticipated with respect to the community wellbeing SEA topic, with the spatial strategy meeting the identified local housing need and locating development close to existing services and facilities in Dickleburgh village, whilst the policy framework seeks to protect community assets and prioritises the wellbeing of residents.

Transportation

- 4.5.30 The neighbourhood area is relatively poorly served by public transport; the nearest train station is located in Diss, and only two limited bus services stop in the neighbourhood area, the number 2 (service between Diss and Norwich) and the number 584 (service between Pulham Market and Diss).
- 4.5.31 The proposed site allocation (Policy DR20) should support the use of active travel as it is in proximity to local services and facilities in Dickleburgh village. It is also in walking distance of the bus stop in the village, supporting the use of public transport. Despite this, it is recognised that any development in the neighbourhood area will likely lead to a degree of car dependency due to the limited range of services and facilities available in Dickleburgh village and the poor public transport connections.
- 4.5.32 In terms of the local road network, traffic is a significant issue during school drop off and collection times, as several children from outside of the village are driven to/ from Dickleburgh to attend Dickleburgh Primary Academy. Three roads are identified as having issues associated with high traffic volume: Ipswich Road, Norwich Road, and Rectory Road/ Harleston Road. Rectory Lane is also a problematic area as it is single track with only one substantive passing point.
- 4.5.33 In response to the above, the DRNP proposes Policy DR15 (Local Traffic Generation) which requires new developments of three or more homes to quantify the level of traffic movements they are likely to generate and its cumulative effect on the traffic flow within the parish. The developer will be expected to deliver appropriate measures to mitigate any negative impacts on the roads that might be caused by development.
- 4.5.34 Additionally, Policy DR16 (Walking, Cycling, and Horse Riding) seeks to enhance and join up networks of footpaths, green paths, and cycleways, and encourage active travel in new highway provisions.
- 4.5.35 More broadly, Policy DR10 (Parking for the Building of New Houses or Conversions) outlines the preference for off-road parking in new

developments, supported by safely designed streets that can accommodate unallocated on-street parking. The policy further encourages the provision of electric vehicle charging points that support more sustainable travel choices.

- 4.5.36 Overall, with growth anticipated in the neighbourhood area with or without the DRNP, increases in vehicle use on local roads are an inevitable evolution of the baseline. Whilst the spatial strategy locates development close to local services and facilities and the bus stop in Dickleburgh Village, and the policy framework seeks to mitigate adverse effects of new development, including traffic and congestion and road safety, **minor negative effects** are still anticipated as residents will still likely rely on the private car to some degree.

Cumulative effects

- 4.5.37 Alongside the provisions of the GNLP, VCHAP and NPPF, the DRNP seeks to support housing delivery in line with forecasted needs over the plan period whilst avoiding significant negative effects in relation to the SEA topics explored above. Wider positive cumulative effects are considered likely through measures that seek to protect and enhance the landscape and green corridors/ nature networks which ultimately extend the neighbourhood area. In this respect, **minor positive** cumulative effects are anticipated.

4.6 Conclusions and recommendations

- 4.6.1 The only significant effects predicted likely in implementation of the DRNP are positive in nature and relate to the community wellbeing SEA theme. This reflects a positive spatial strategy that meets the identified housing need and ensures adequate connectivity, alongside the protection of key community facilities and resident health and wellbeing.
- 4.6.2 Minor negative effects are considered likely in relation to the SEA themes of landscape, historic environment, land, soil, and water resources, and transportation. The proposed DRNP policies provide mitigation that should minimise the identified potential for adverse impacts, and the residual effects largely reflect the inevitable loss of greenfield land neighbouring the conservation area and Dickleburgh Stream, and a likely increase in private car use in the neighbourhood area. Neutral effects are considered achievable in relation to the historic environment, though some uncertainty exists until precise development proposals are known.
- 4.6.3 Minor positive effects are also concluded as likely in relation to biodiversity, and landscape, reflecting the wider policies provisions that identify and protect green corridors, promote biodiversity net gains in development, and propose settlement and local gaps where there is a preference for the land to remain undeveloped. This is also likely to lead to minor positive cumulative effects given that landscape and biodiversity effects extend the immediate neighbourhood area to provide benefits at a more regional scale.
- 4.6.4 Neutral effects are predicted as most likely in relation to climate change where it is recognised that whilst mitigation will be required to avoid negative effects arising in future development of the neighbourhood area, the DRNP proposes multiple policies that seek to ensure such mitigation is delivered alongside development. The DRNP also proposes connected development

and policies that seek to improve the sustainability performance of new development. On this basis, no significant deviations from the baseline are anticipated.

5. Next steps

5.1 Plan finalisation

- 5.1.1 Following submission, the plan and supporting evidence (including this SEA Environmental Report) will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.
- 5.1.2 Assuming that the examination leads to a favourable outcome, the Neighbourhood Plan will then be subject to a referendum, organised by South Norfolk Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the DRNP will become part of the Development Plan for South Norfolk Council, covering the defined neighbourhood area.

5.2 Monitoring

- 5.2.1 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.
- 5.2.2 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by South Norfolk Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the DRNP that would warrant more stringent monitoring over and above that already undertaken by South Norfolk Council.

Appendix A – Regulatory requirements

As discussed in **Chapter 2**, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. **Table A** links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table B** explains this interpretation. **Table C** identifies how and where within the Environmental Report the regulatory requirements have / will be met.

Table A: Questions answered by the Environmental Report, in accordance with an interpretation of regulatory requirements

Report section	Questions answered	Regulatory requirement met
Introduction	What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan, and relationship with other relevant plans and programmes.
	What is the scope of the SEA?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance. Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Key environmental problems/ issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
Part 1	What has plan-making/ SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach). The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in light of the alternatives assessment/ a description of how environmental objectives and considerations are reflected in the Plan.
Part 2	What are the SEA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the Plan. The measures envisaged to prevent, reduce, and offset any significant adverse effects of implementing the Plan.
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged.

Table B: Questions answered by the Environmental Report, in accordance with regulatory requirements

Schedule 2	Interpretation of Schedule 2	
<i>The report must include...</i>	<i>The report must include...</i>	
1. an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
2. the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
3. the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
4. any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
5. the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
6. the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'baseline'?</i>
7. the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues & objectives?</i>
8. an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
9. a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table C: ‘Checklist’ of how (throughout the SEA process) and where regulatory requirements are or will be met.

Regulatory requirement	Discussion of how the requirement is met
Schedule 2 requirements:	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 2 (‘What’s the plan seeking to achieve’) presents this information. The relationship with other plans and programmes is also set out in Appendix B (Scoping Information).
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report published in 2022. The outcome of scoping was an ‘SA framework’, and this is presented within Chapter 2 (‘What’s the scope of the SEA’). More detailed messages from the Scoping Report - i.e., key issues established through context and baseline review - are presented within Appendix B.
3. The environmental characteristics of areas likely to be significantly affected.	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	
5. The environmental protection objectives established at international, national, or community level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	The Scoping Report (2022) presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined to establish an ‘SEA framework’. The context review informed the development of the SEA framework and topics, presented in Chapter 2, which provide a methodological ‘framework’ for appraisal. With regards to explaining “how... considerations have been taken into account” - <ul style="list-style-type: none"> Chapter 3 explains how reasonable alternatives were established in-light of available evidence. Chapter 3 sets out the detailed appraisal of alternative options. Chapter 3 explains the Council’s ‘reasons for supporting the preferred approach’, i.e., explains how/ why the preferred approach is justified in-light of alternatives appraisal (and other factors). Chapter 4 sets out the findings of the appraisal of the draft plan and provides a summary of the findings and any recommendations.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship	<ul style="list-style-type: none"> Chapter 3 explains how reasonable alternatives were established in-light of available evidence. Chapter 3 sets out the detailed appraisal of alternative options. Chapter 4 sets out the findings of the appraisal of the draft plan and provides a summary of the findings and any recommendations.

Regulatory requirement	Discussion of how the requirement is met
between the above factors. (Footnote: these effects should include secondary, cumulative, synergistic, short-, medium-, and long-term, permanent and temporary, positive and negative effects).	As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SEA scope, and the need to consider the potential for various effect characteristics/ dimensions.
7. The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Where necessary, mitigation measures are identified within the alternatives appraisal (in Chapter 3) and appraisal of the Plan (Chapter 4).
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Chapter 3 deals with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues/ options. Also, Chapter 3 explains the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal). Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/ assumptions are also discussed as part of appraisal narratives.
9. A description of the measures envisaged concerning monitoring in accordance with Article 10.	At this stage no additional monitoring measures are identified as being necessary over and above those already being considered by South Norfolk Council.
10. A Non-Technical Summary of the information provided under the above headings.	A Non-Technical Summary (NTS) is provided at the start of the report.
The SA Report must be published alongside the Draft Plan, in accordance with the following regulations: Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying SA Report before the adoption of the plan or programme (Art. 6.1 and 6.2).	At the current time, this submission Environmental Report is being published alongside the Regulation 16 submission version of the DRNP.
The SA Report must be taken into account, alongside consultation responses, when finalising the Plan. The SA Report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6, and the results of any transboundary consultations entered into pursuant to Article 7, shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	The Council has considered this Environmental Report when preparing the submission version of the Plan for publication.

Appendix B - Scoping information

Linked to Chapter 2 of the main report, this appendix provides scoping information, namely the key issues that have informed the scope of the SEA and the subsequent detailed SEA framework.

Air quality – key issues

- According to data from 2019, there are no AQMAs in South Norfolk. Given this, and the moderate housing needs of the neighbourhood area, it is unlikely that development in the area will have a significant impact on air quality.
- The effects of traffic and congestion will still be considered through the transportation topic.

Due to the absence of any significant air quality issues raised in relation to the draft D&RNP, **the air quality topic has been scoped out for the purposes of the SEA process.**

Biodiversity and geodiversity – key issues

- Although there are no designated sites for biodiversity within the D&RNP, there are several SSSIs and an LNR in the vicinity of the area. Only parts of the neighbourhood area fall within IRZs for these sites, however development in the neighbourhood area will increase the number of people visiting these sites and those further afield, and as such, will have an impact on these sites. The D&RNP should ensure policies are in place to mitigate the impact of any development in the neighbourhood area on the nearby designated sites.
- In terms of BAP priority habitats, the neighbourhood area primarily includes areas of deciduous woodland, as well as small areas of traditional orchard and an ancient woodland. It will be important to ensure that the spatial strategy and policies of the D&RNP seek to support these habitats and the connections between them, particularly by avoiding habitat loss and fragmentation, but also by improving connections between habitats.
- The centre of the neighbourhood area is covered by an area of Network Enhancement Zone 1 surrounding two small traditional orchards. This provides a valuable opportunity for the neighbourhood area to improve the connection between habitats, which will improve the local green infrastructure network and support the movement of wildlife.
- South Norfolk Council have advised that in their view a Habitat Regulations Assessment (HRA) should be undertaken in order to assess any significant impacts on protected habitat sites that would result from giving effect to the Neighbourhood Plan. This will allow the D&RNP to ensure development has a minimal impact on existing habitats, with potential to identify areas for habitat improvement and creation in the area. The HRA findings will inform the SEA in subsequent stages.
- Dickleburgh Moor is currently being restoring to a water meadow to support local wildlife, and although not a designated habitat, it is a highly valued local habitat that defines the local area and supports a range of wildlife. The Otter Trust 's Black Poplar project further aims to conserve the native population of Black Poplar trees at this site. In addition to this, other locally important habitats include

Langmere Green CWS and St Clements Common. The D&RNP should seek to protect and enhance these habitats, which will benefit not only local wildlife but also the residents of the neighbourhood area.

- A historic hedgerow pattern can be found in the neighbourhood area, which often contains a great range of plant and wildlife species and can form important linkages between other habitats such as woods. The D&RNP should seek to preserve and build upon this network of hedgerows, as this will have positive knock-on effects for wildlife in the area.
- Eight bat species have been recorded across sixteen locations in the neighbourhood area, as well as three small terrestrial mammal species and four bush-cricket species. The D&RNP should seek to protect these species, particularly the bat species as they are legally protected by both domestic and international legislation.

Climate change – key issues

- South Norfolk County Council is yet to declare a climate emergency. However, the D&RNP should still seek to maximise opportunities to support actions in tackling climate change. This may be through encouraging the use of sustainable modes of transport, including walking, cycling and public transport, supporting the uptake of EVs through the provision of charging infrastructure, ensuring new developments meet sustainable design criteria, and increasing the amount of energy produced from renewable resources.
- Source data from the Department of Energy and Climate Change shows that South Norfolk has recorded higher CO₂ emissions per capita than both the East of England and England between 2005 and 2019. Moreover, the reduction in emissions per capita in South Norfolk during this period has been lower than both the East of England and England, which suggests that current actions to reduce CO₂ emissions are not keeping up with those demonstrated at the regional and national level.
- The transport sector continues to be a key challenge in terms of reducing emissions, especially as the neighbourhood area has a relatively poor public transport network, which needs improving considering the limited range of services and facilities on offer in the neighbourhood area. In this respect, the D&RNP provides an opportunity to guide development towards the most accessible locations in the area, which will encourage active transport, and support local infrastructure improvements to help reduce the use of private vehicles.
- Fluvial flood risk in the neighbourhood area is largely linked to the Dickleburgh Stream. The sections of Dickleburgh Road and Norwich Road that cross the Dickleburgh Stream, as well as the land north of Rectory / Harleston Road, are within Flood Zone 3. It is vital that the D&RNP guides development away from this area within Flood Zone 3 as it is likely that climate change will exacerbate flood risk in this area in the future.
- Surface water flooding in the neighbourhood area is also largely linked to the Dickleburgh Stream. Areas of particular concern include parts of Dickleburgh Road, Dickleburgh Bypass, Burston Road, Harvey Lane, Langmere Road, Lakes Road, and Harleston Road. Again, the D&RNP should guide development away from areas at high risk of surface water flooding, although mitigation measures

such as sustainable drainage systems (SuDS) can provide a degree of protection in these areas.

- A PFRA was undertaken for South Norfolk, indicating general areas where surface water flood risk is likely to be most significant. The assessment estimates that 20 properties in Dickleburgh may be at risk of surface water flooding. In addition to this, the Waveney floodplain is under pressure to accommodate development that may decrease its capacity. The impacts of climate change may require an increase in floodplain capacity if current levels of flood relief are to be maintained. It is important that the D&RNP takes into consideration these issues when guiding development.

Landscape – key issues

- Key landscape features within the neighbourhood area, as identified through the landscape character assessment, include trees, wooded river valleys, small tributaries, and long-distance views. The D&RNP can help to protect and enhance such qualities in new development, and develop local evidence underpinning development proposals. Key benefits arising from the D&RNP could include the identification of key views, and outlined expectations for development density, massing, and layouts or even masterplanning of any potential larger site allocations.

Historic environment – key issues

- The neighbourhood area contains a wealth of designated heritage assets, including two Grade I listed buildings, 83 Grade II listed buildings, and one Grade II* listed building, as well as one conservation area. It is vital that the D&RNP seeks to conserve these heritage assets as they contribute significantly to the historic setting and value of the area.
- The D&RNP should ensure that future development in and around the Dickleburgh Conservation Area follows a similar pattern to previous development, being sympathetic to the character of the village in terms of size and scale of housing and the use of locally distinctive materials, as not to detract from the character of this area.
- The Norfolk HER identifies heritage assets that positively contribute to local distinctiveness and sense of place. A search of the HER produces 286 records for the neighbourhood area. During the subsequent stages of the SEA process, the Norfolk HER will need to be reviewed in greater detail to determine the potential impacts of the D&RNP on non-designated heritage features.
- Historic England's Heritage at Risk Register does not list any designated heritage assets within the neighbourhood area. However, as the Register does not contain information about the status of Grade II listed buildings for areas outside of London, it is currently not possible to determine whether any of the Grade II listed buildings within the neighbourhood area are at risk. In this respect, the D&RNP should seek to identify Grade II listed buildings at risk to ensure that future development does not contribute to their deterioration.
- It will be important to ensure that future development avoids/ minimises impacts upon the historic environment and maximises opportunities to improve the public realm and green infrastructure, to the indirect benefit of heritage settings. The D&RNP plays an important role in delivering this.

Land, soil, and water resources – key issues

- Given that the neighbourhood area is predominantly underlain by Grade 3 (Good to Moderate) agricultural land, with a moderate likelihood of the presence of BMV land, new development areas have the potential to result in the permanent loss of productive agricultural land. The D&RNP should seek to retain greenfield land where possible, particularly by making best use of brownfield sites for development where such opportunities exist.
- Significant quantities of peat reserves have been discovered on Dickleburgh Moor and it is likely that these reserves extend the land owned by the Otter Trust. The DRNP should seek to investigate, protect, and retain these where possible.
- The neighbourhood area lies within the catchment of the Dickleburgh Stream Water Body, which has a 'moderate ecological status'. This is partially due to a 'poor' score for ammonia and phosphate and a 'fail' for PBDE. The D&RNP cannot realistically address this issue, as the main source of these chemicals is farming practices, such as the use of fertilisers, and pollution from sewage treatment works. However, the D&RNP can support water quality by avoiding development with the vicinity of rivers, as well as by expanding and / or enhancing riparian habitats.
- As the north eastern extent of the neighbourhood area falls within a Zone I (Inner Protection Zone) and Zone II (Outer Protection) SPZ, development in the neighbourhood area has the potential to impact these designations. This could be from any activity that might cause pollution in the area, including for example, storing pollutants like petrol underground or soakaways from septic tanks to the ground. It will be important for the D&RNP to address this by ensuring that any proposed development within and in close proximity to Rushall does not have a negative impact on groundwater sources used for drinking supply.
- It is unlikely that the small-scale development being proposed through the D&RNP will have a significant impact on the wider area's NVZ designation given the strategic scale of the overall NVZ. Additionally, a large source of detriment to NVZ comes from agricultural use, which is not anticipated to be brought forward through the D&RNP. However, the D&RNP should highlight suitable measures to protect the DWSZ for Surface Water.

Community wellbeing – key issues

- The population of the neighbourhood area has increased from 1,472 to 1,547 between 2011 and 2022, which represents a 5.1% increase. At least 20 dwellings have been proposed for the neighbourhood area, which will support population growth in the area. However, it is important that this increase in population does not negatively impact community identity and cohesion.
- The neighbourhood area has a relatively high rate of deprivation in relation to the 'Living Environment Deprivation Domain'. The D&RNP can seek public realm and accessibility improvements, which may help to address some of these barriers and reduce deprivation within this domain.
- According to 2011 census data, 72.3% of the population of the neighbourhood area own their house and 27.7% rent or are living rent free. The community has expressed a desire for affordable homes, homes for young families, and homes for the elderly that support independent living. The D&RNP plays an important

role in steering development in the desired direction in terms of housing tenure by highlighting residents' needs.

- The services and facilities within the neighbourhood area support community vitality and a high quality of life, and the availability of community assets is essential for continued growth within the area. As the requirements of the working population continue to change, particularly in response to the Covid-19 pandemic, there is likely to be a demand for more adaptable dwellings which can accommodate flexible working practices.
- The draft D&RNP identifies fourteen areas of LGS, which it seeks to protect from future development. The D&RNP plays an important role in ensuring this locally valued green space is maintained for the use and enjoyment of the local community.

Transportation – key issues

- There are no train stations within the neighbourhood area, and there is only a limited bus service in the area, which has caused a reliance on private vehicles. Alternative sustainable modes of transport should be explored through the D&RNP to reduce private vehicle usage where possible.
- Recovery from the Covid-19 pandemic has the potential to change travel patterns in the short, medium and (potentially) longer term. As such, residents in the neighbourhood area may have a reduced need to travel outside of the Parish due to remote working arrangements. The D&RNP could therefore support measures to improve self-containment and meeting more needs locally, which will have positive knock-on effects on the air quality, climate change and community wellbeing topics.
- Congestion during school drop off and collection is a key issue in the neighbourhood area, which could be addressed to some extent by improvements to the public transport network. Speeding is also an issue in the area, which poses a significant safety risk to the residents of the neighbourhood area. The D&RNP can help steer improvements to off-road parking and the provision of safe drop off and collection areas, as well as traffic calming measures, which will help to address these issues.

Table 10.1 Proposed SEA framework

SEA topic	SEA objective	Questions to consider when assessing the allocation(s) / proposals within the D&RNP (will the option/ proposal help to...)
Air Quality	Scoped out	<i>Scoped out</i>
Biodiversity and Geodiversity	Protect and enhance biodiversity and geodiversity.	<ul style="list-style-type: none"> • Support the integrity of the designated sites for biodiversity and geodiversity located within proximity to the neighbourhood area? • Protect and enhance priority habitats and species and the connections between them?

SEA topic	SEA objective	Questions to consider when assessing the allocation(s) / proposals within the D&RNP (will the option/ proposal help to...)
		<ul style="list-style-type: none"> • Support the national habitat network, particularly Network Enhancement Zone 1 and the habitats it surrounds? • Achieve biodiversity net gains and support the delivery of ecosystem services and green infrastructure networks? • Protect and enhance Dickleburgh Moor, Langmere Green CWS and St Clements Common, especially the species that inhabit them? • Preserve and build upon the historic hedgerow pattern found in the neighbourhood area? • Protect the various species found in the neighbourhood area, particularly the eight species of bat? • Increase the resilience of biodiversity in the area to the effects of climate change? • Support access to, interpretation and understanding of biodiversity and geodiversity?
Climate Change	Reduce the contribution to climate change made by activities within the neighbourhood area.	<ul style="list-style-type: none"> • Reduce the number of journeys made by private vehicle, especially those that run on petrol / diesel? • Promote the use of sustainable modes of transport including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources and reduce energy consumption from non-renewable resources? • Support the uptake of EVs through the provision of EV charging infrastructure within the neighbourhood area?
	Support the resilience of the neighbourhood area to the potential effects of climate	<ul style="list-style-type: none"> • Ensure that development does not take place in areas at high risk of flooding, considered the likely future effects of climate change? • Improve and extend green infrastructure network to support adaptation to the potential effects of climate change?

SEA topic	SEA objective	Questions to consider when assessing the allocation(s) / proposals within the D&RNP (will the option/ proposal help to...)
	change, including flooding.	<ul style="list-style-type: none"> • Sustainably manage water runoff and drainage, including through the utilisation of SuDs? • Ensure that potential risks associated with climate change are considered through new development? • Increase the resilience of biodiversity to the effects of climate change, including through enhancements to ecological networks?
Landscape	To protect and enhance the character and quality of the immediate and surrounding landscape and villagescape.	<ul style="list-style-type: none"> • Protect and / or enhance local landscape and villagescape character, key sensitivities, and quality of place? • Protect trees with TPOs in the neighbourhood area? • Conserve and enhance local identity and settlement character? • Protect visual amenity and locally important views?
Historic Environment	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.	<ul style="list-style-type: none"> • Conserve and enhance buildings, structures, and areas of architectural or historic interest and their settings, including the Dickleburgh Conservation Area? • Protect the integrity and the historic setting of key finds of cultural heritage interest as listed in the Norfolk HER? • Identify whether any Grade II listed buildings within the neighbourhood area are deemed at risk, and address this appropriately? • Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies?
Land, Soil, and Water Resources	Ensure the efficient and effective use of land.	<ul style="list-style-type: none"> • Avoid the loss of productive agricultural land and retain higher quality land where possible? • Promote any opportunities for the use of brownfield land, or vacant / underutilised land?
	Protect and enhance water quality and use	<ul style="list-style-type: none"> • Avoid any negative impacts on water quality and support improvements to water quality?

SEA topic	SEA objective	Questions to consider when assessing the allocation(s) / proposals within the D&RNP (will the option/ proposal help to...)
	and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> • Ensure appropriate drainage and mitigation is delivered alongside proposed development? • Protect waterbodies from pollution? • Maximise water efficiency and opportunities for water harvesting and / or water recycling? • Protect SPZs and the DWSZ for surface water in the neighbourhood area?
Community Wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.	<ul style="list-style-type: none"> • Provide everyone with the opportunity to live in good quality, affordable housing? • Support the provision of a range of house types and sizes? • Meet the needs of all sectors of the community? • Provide flexible and adaptable homes that meet people's needs, particularly the needs of an ageing population? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Encourage and promote social cohesion and active involvement of local people in community activities? • Facilitate green infrastructure enhancements, including improved access to open space? • Maintain or enhance the quality of life of existing residents?
Transportation	Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> • Support the strategic objectives within the Local Transport Plan Strategy to encourage more sustainable transport? • Encourage a modal shift to more sustainable forms of travel and enable active travel enhancements? • Improve local connectivity and pedestrian and cyclist movement? • Facilitate working from home to reduce the use of private vehicles to access workplaces outside of the neighbourhood area?

SEA topic	SEA objective	Questions to consider when assessing the allocation(s) / proposals within the D&RNP (will the option/ proposal help to...)
		<ul style="list-style-type: none">• Improve road safety, particularly through measures to reduce speeding on key roads?

