Examiner Questions

Part 1: The processes used to select the housing allocation to the west of Norwich Road (Policy DR20), and the reasonable alternatives considered.

This session will address the following matters:

1.1 the site selection process for the proposed housing allocation, and the way in which reasonable alternatives were considered;

1.2 the way in which the second Environmental Report (December 2024) was a natural iteration of the first Report (January 2023); and

1.3 the extent to which the second Environmental Report properly underpins the site selection process both generally, and in the context of the contents of Table 3.2.

1.1
the site selection process for the proposed housing allocation, and the way in which reasonable alternatives were considered.

Selection of sites – gathering community opinion

1.1 The selection of sites has been guided by public consultation outcomes.

We decided that, as we engaged in the development of the NP, we needed to be able to take the community with us. Failure to do so would have inevitably meant that the NP itself would fail. Public meetings were held at the Village Centre (1a and 1b).

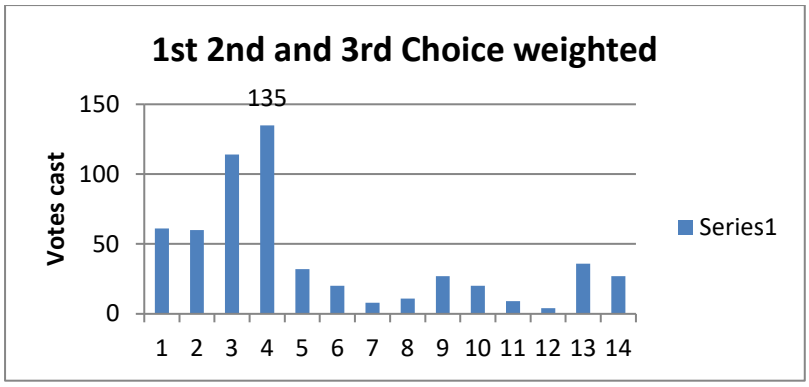
The questionnaire was created and analysed during winter 2018 and spring 2019 (1c). A further 2 open public sessions were organised to gather residents' views and ensure the NP development was developing in line with public opinion (1d, 1e and 1f).

1a) Views of those attending meeting **24th February 2017**.

The key messages: No development on smaller roads, planned development not piecemeal. Development should not extend the Village. No urban sprawl. Ensuring natural habitats.

1b) Future development plans for our village

Villagers responses: 102 individual responses, **May 2017** (residents opinions on the call for sites. If development has to occur, which site would you prefer to see developed).



1c) NP questionnaire results **January 2019** – summary presented to the PC.

Key outcomes – promote rurality, beautification, ditches, character of the village, biodiversity, development sympathetic to the environment, affordable housing.

1d) Have Your Say **27th April 2019** 10 page document – checking progress.

1e) Written comments from Have Your Say session **27th April 2019**.

Key takeaways: Sightlines, biodiversity corridors (green), wildlife areas, importance of the area around the bottlebank, self-build homes, parking space an bedroom count, housing with the environment in mind.

1f) Have Your Say 2 **18th and 20th January 2020** 10 page document

Housing in keeping with the village heritage. Rural identity. Rainwater harvesting.

1g) Written comments from Have Your Say 2 sessions.

Key takeaways: Rurality, rural environment and rural protection, transport issues around narrow roads and single track roads, Housing development should be to the West of the Village, green corridors and open spaces

within the village. Dark Skies, lorries and traffic, footpaths and safe walking, Current (new) housing estates flooding.

Selection of sites

1.1.2 NP team identifying the site selection process and evidence gathering to support the final decision

2 The process to identify a site / sites involved: Gathering further evidence by consultation with advisory bodies, consultation with statutory bodies, site visits, public surveys, traffic surveys, pollution surveys (2a – 2i).

2a) We adapted the **Central Norfolk Strategic Housing and Economic Land Availability Assessment: Methodology Final July 2016** as the basis for our HELLA.

2ai) Central Norfolk Strategic Housing and Economic Land Availability Assessment: Methodology Final July 2016

2b) Reflection upon and scrutiny of documentation from GNLP. Example 5.25. Dickleburgh and Rushall

2bi) Extract from GNLP 5.25 Dickleburgh and Rushall

2c) 6th February 2019 Meeting with Simon Marjoram and John Walchester (SNDC) identifying sites introduction to SNDC advice http://www.gnlp.org.uk/assets/Uploads/HELAA-addendum-2018-final.pdf pages 247 - 254 are the Parish of Dickleburgh and Rushall.

2ci) Simon Marjoram and John Walchester meeting with AG to discuss changing state of allocations AG minutes

2cii) Simon Marjoram and John Walchester meeting with AG to discuss changing state of allocations SM notes

2ciii) Note from Richard Squires on the SNBDC sites promoted by SNC for HELA

2d) Development of our HELLA – Led by Allan Eaves qualified architect and senior planning officer for London Borough of Harrow (retired).

2di) South Norfolk on line HELA responses Allan update

2dii) The South Norfolk HELA grid

2diii) Judgements in light of Anglia Water recommendation 24.6.19

2e) Introduction / Preface to Submission of HELLA Site Assessments.

2ei) D and RNP Team intro / preface to submission of HELAA site assessment 28/6/2019

2f) site visits

2g) Street / Road Character assessments conducted circa Feb 2019 example

2h) roadside verge surveys

2hi) Master copy

2i) Traffic surveys using the movable PC SAMs camera and the speed watch team. Evidence showed the heaviest used roads were Harvey Lane (which is a single track into the Village now a Quiet Lane), and the Street (which links Norwich road, Ipswich Road and Rectory Road).

2j) Pollution surveys

2k) Example of Bat surveys

2ki) Example of Bat survey outcome

Meetings to consider the site / sites

1.1.3 With the evidence gathered from public opinion, surveys, advice and new evidence emerging all the time the NP team held a series of meetings to identify and confirm the site or sites going forward, to reduce the number of sites and eventually identify 1 or 2 sites to promote in the Neighbourhood Plan (3a – 3g).

Meetings

3a) 3rd October 2017 Meeting with Adam Nicholls (SNDC) and members of Starston PC to consider the call for sites outcome and receive procedural advice.

3b) 15th April 2019 identifying the aims and objectives of the NP Housing Policies

3c) 22nd June 2019 Site Assessment meeting – Introduction to submission

3ci) 4 sites identified as possible for delivering requirements

3cii) Dickleburgh NP Density Review

3ciii) Agenda Site Assessments

3d) 19th March 2020 considering the proposals from the Chenery site

3di) Chenery proposals The drawing includes a green field (not agreed)

3e) 21st July 2020 Virtual meeting with La Ronde

3eii) draft policies with advice from SN

3f) 3rd September 2020 Chenery site meeting (agenda)

3fi) minutes
3g) 17th September 2020 Reducing the sites. This meeting created a Hierarchy of sites agenda
3gi) Appendix 1c Preferred sites brief
3gii) Screen shot of support documentation
3giii) site scoring
3h) 29th October 2020 Confirming the strategy and outcomes for the preferred sites and proposed Design Guide (part of a larger document)
3i) 2nd May 2021 identify Site 1 going forward
3j) 17th JUNE 2021 meeting Purpose: To review the site allocation in light of the Village Clusters (email from SNDC used as guidance). Confirm the NP will promote 25 homes and allocate 15 homes to site 1 and 10 homes to site 2 (Chenery brown field). To confirm rejection of the extended site.
3k) 12th July 2021 Minutes of PC meeting.
3l) 18th October 2021 Minutes of PC meeting.
3m) 8th and 22nd July 2024 part 2 item 34

Emails that supported the site process
1.1.4 The following emails are selected as they are pertinent to the decision making process of reducing the site selection from 2 sites to a single site.
4a) 4th August 2021 From AG to the team. Outlining the agreement on numbers and the proposal to Chenery site. The PC requested should Chenery refuse the allocation it should go in full to La Ronde. Verbal confirmation from Tricker and Last that the offer would be rejected.
4b) 20th September 2021 AG to Martin Last (Chenery site) – following up initial contact
4c) 22nd September 2021 ML to Tony Tricker copied to PC clerk and AG – rejection of the offer and withdrawal by the owners of the process.
4d) 22nd September 2021 AG to ML – Thanking Martin Last for the information, confirming the decision will be passed to the team.
5e) 12th August 2022 AG to AECOM Cheryl and Emma – confirming the withdrawal of the Cheneryu site from the process.
5f) Alex Mann No to the LGS
5g) Email trail from 9th June 2021 referencing 2 sites and GNLP reg 18
5h) AG to team following zoom meeting with Tricker and Last planning next site meeting
5i) A. Eaves to team re site documentation 7th July 2019
5j) A. Eaves questioning the density of the Chenery site 18th March 2020 (they have understated the numbers)
5K) 9th June 2021. Housing numbers changed 1 more meeting

Part 1.2
the way in which the second Environmental Report (December 2024) was a natural iteration of the first Report (January 2023); and

Applying for funding to produce a Second SEA
1.2.1 Following the Regulation 14 process there were questions raised (particularly by South Norfolk District Council) that led our consultant to conclusion that there had been enough changes and policy reviews to justify a new / reviewed SEA. The following emails are simply my (AG) knowledge of the discussion process. There is evidence to suggest that conversations took place between different parties that the NP team were unaware of.

Emails
1a) 12th February 2024 AG to CB at AECOM. Responses from regulation 14.
1b) 25th March 2024 CB to AG. Clarification on progress to full submission.
1c) 23rd July 2024 AG to CB. Identifying the progress.
1d) 25th July 2024 AL (Andrea Long author of the Basic Conditions Statement) to CB questioning if the SEA may need updating in light of the refined objectives.
1e) 25th July 2024 CB to AG and AL Agreed there may need to be an update. AG to apply for funding.
1f) 26th July 2024 AG to CB funding application for SEA update had begun.

1g) 5th August 2024 CB to AG. AECOM organising the application for funding.
1h) 21st August 2024 AG to PH (Paul Harris, SNDC) confirming PC sign off of the NP and the application for SEA funding.
1i) July PC meeting signing of the NP?
1j) 30th November 2024 AG to CB NP team response to the first draft.
1k) 11th December 2024 AG to CB confirming Historic England schedule application no:1487027 for Dickleburgh Moor
1l) 20th December 2024 CB to AG Second SEA delivered.
1m) 11th September 2025 RS (Richard Squires SNDC) to AG confirming SNDC question over the SEA at reg 14.

Documents
1.2.2
2a) NP team official response to first draft of SEA 2.
2b) AECOM response with confirmation of changes to SEA 2 from NP team response

The link between the 2 SEA's.
Following the GNLP call for sites exercise, the Dickleburgh and Rushall Parish Council found itself in a position where most of the land around the Village of Dickleburgh (and some land within the Village), came forward as possible / potential development sites. The PC initiated the NP process as a means of retaining an element of control. The SEA was produced after the HRA during the process of determining the site and finalisation of the site/s. Following formal comments made as a response to Regulation 14 it was agreed by AECOM to revisit the SEA. The outcome was that a second SEA was written. It is our understanding that this was always a complementary SEA and not an alternative SEA.

Both SEA's use the same Framework (see below).

Jan. 2023 Table 3.2 SEA Framework p.8			**Dec. 2024 Table 1.1 Summary Framework p.3**	
SEA Topic	**SEA Objective**		**SEA Topic**	**SEA Objective**
Biodiversity and geodiversity	Protect and enhance		Biodiversity and geodiversity	Protect and enhance
Climate Change	Reduce contribution		Climate Change	Reduce contribution
	Support Resilience			Support Resilience
Landscape	Protect and Enhance		Landscape	Protect and Enhance
Historic environment	Protect and conserve		Historic environment	Protect and conserve
Land soil Water	Ensure efficient effective use of land		Land soil Water	Ensure efficient effective use of land
	Protect and enhance water quality			Protect and enhance water quality
Community wellbeing	Growth aligned with need		Community wellbeing	Growth aligned with need
Transport	Promote sustainable transport		Transport	Promote sustainable transport

1.2.3 Site selection process
3a) Following the NP team site analysis, the NP team identified 4 possible sites as going through the first round. In relation to SEA 2 that effectively meant that the NP team had selected option 1 and option 2 to go forward for further consideration (SEA 2 page 4, figure 1.1 and p.21, figure 3.5).
3b) The sites were further reduced to a single site in option 1 (site 2 of both SEA's 1 and 2) and a single site in option 2 (site 1 of both SEA's 1 and 2). Significant assistance was provided by SEA 1 p.26, 6.45. At this stage the NP team were prepared to offer the housing solution to the 2 sites (10 on the brown field site in option 2 and 15 on the green field site on option 1 of SEA 2).
3c) The sites were reduced again to a single site after the withdrawal of the option 2 site (SEA 2 and SEA 1).

1.2.4 The relationship between the 2 SEA's

4a) The 2 SEA's provide, to our mind, an unrivalled analysis of the environment in and around the Village of Dickleburgh. They complement each other providing analysis from the macro level to the micro level. The SEA's also reflect the changing state of availability of sites and the developing policies of the NP.

Part 1.3
The extent to which the second Environmental Report properly underpins the site selection process both generally, and in the context of the contents of Table 3.2.

SEA 2 Table 3.2 and SEA 1 summary findings 6.45
Table 3.2 in SEA 2 is a strategic overview of the 4 groupings of sites identifying strengths and weaknesses of each option (geographic group of sites).
Summary findings 6.45 (page 26) in SEA 1 is a focused look at the 4 sites that came forward from SEA 2 option 1 and 2 (the overview).
Together the table and summary finding provide a comprehensive analysis of the sites to guide the decision making process.

The confusion?
Some may have been confused by the use of the term "option" in both SEA's. In both SEA's the original options denotes sites. The second SEA, to reduce the number of options, groups sites into geographical areas and identifies each area as an option. Thus enabling the NP team to whittle down the geographical areas and therefore the number of sites. In SEA 1 the 4 options denote 4 single sites and provides in depth (micro) analysis of each site. In both SEA's the site numbers are the same.

Each site is an option and the options correlate across the SEA's
In both SEA 1 and 2, sites are regarded as options and identified as such (SEA 1 figure 5.4, and SEA 2 figure 1.1). Both SEA's present a rationale to reduce the number of options and reassign options (SEA 1 15.11 – 5.16, and SEA 2 1.4.3, page 3).