

17 October 2025

Our ReferenceDickleburgh and Rushall
Neighbourhood Plan SEA

Mr A Goodman

**Response to SEA matters raised at Examination**

Dear Andrew,

Please find below our discussed responses to the SEA matters that were raised at Examination (16th October 2025). This is intended to be a formal record of these responses for publication on the neighbourhood plan website.

The following questions were posed to AECOM, in relation to the work undertaken to deliver the SEA Environmental Report published in January 2023, and the updated SEA Environmental Report published in December 2024:

1. **Why were sites 3 and 19 not considered in the second SEA Environmental Report?**
2. **Why are the alternatives different in the two reports?**
3. **Why was a second SEA Environmental Report necessary?**

These questions were posed to AECOM considering the following matters to be discussed at hearings held 16th October 2025:

- **The site selection process for the proposed housing allocation, and the way in which reasonable alternatives were considered.**
- **The way in which the second Environmental Report (December 2024) was a natural iteration of the first Report (January 2023); and**
- **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.**

In the first instance we note the role of the SEA, whilst it considers site options and growth strategies, the SEA does not select sites for allocation. The SEA process supports the evidence base for the plan. In this respect, it is intended to support plan-making and decision-making undertaken by the Qualifying Body (i.e., the NP steering group). A particular requirement of the SEA is to assess the preferred plan approach alongside 'reasonable alternatives'.

Reasonable alternatives were established following consideration of strategic factors (housing need, completions & commitments), and land supply options (site options). This is detailed in Chapter 5 of the first Environmental Report (January 2023) and in Chapter 3 of the second Environmental Report (December 2024).

The second SEA Environmental Report (December 2024) is an iteration of the first SEA Environmental Report (January 2023), in that the process to arrive at reasonable alternatives was repeated in 2024 considering updated evidence and consultation feedback. Two key changes affected the alternatives as they had been established in 2023:

1. Consultation feedback from South Norfolk Council raised concerns in relation to the proposed 'Settlement Gaps' policy which resulted in plan changes (reduced designated areas). This had minor implications for the SEA. Additionally, the response from the Council highlighted a need for the SEA to include the sites that fell within the proposed settlement gaps, which would ultimately mean revisiting and updating the alternatives assessed through the SEA to date.
2. One site that had previously been considered through the SEA (Site 3, which formed part of Option 3) could no longer be confirmed by the Qualifying Body as available over the plan period. Without the confidence that this site could be delivered over the plan period, it was no longer considered a 'reasonable alternative'.

These changes are ultimately what underpinned the decision that a new SEA was necessary. In the second SEA Environmental Report (December 2024) more sites were identified as potential alternatives, which led to the appropriateness of undertaking a 'points of the compass' approach through the assessment, exploring the effects of development in various locations around the settlement. The SEA highlights merits and constraints associated with the sites in these locations, and these findings have fed into plan and decision-making (undertaken by the Qualifying Body).

In establishing alternatives, the SEA identifies sites that are not considered to form reasonable alternative options, particularly sites that do not support the objectives of the plan. Of note, this includes sites that fall within the 'Cordon Sanitaire', with the SEA stating that *"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"*. Site 19 has not been confirmed as available over the course of plan-making, and Site 3 fell away post-Regulation 14 consultation as this site also could not be confirmed as available. Additionally, Site N1 was discounted as no reasonable access to the site could be established.

These points ultimately address the questions and matters raised in relation to the SEA and we hope you find this useful. Please do not hesitate to get in contact should any further queries arise.

Yours sincerely,



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