Cabinet

Agenda

Members of the Cabinet:

Cllr J Fuller (Chairman)	Leader, External Affairs and Policy
Cllr K Mason Billig (Vice Chairman)	Governance and Efficiency
Cllr A Dearnley	Finance and Resources
Cllr R Elliott	Customer Focus
Cllr G Minshull	Clean and Safe Environment
Cllr L Neal	Stronger Economy
Cllr A Thomas	Better Lives

Date & Time:

Monday 9 January 2023
9.00 am

Place:

Council Chamber, Thorpe Lodge, 1 Yarmouth Road, Thorpe St Andrew, Norwich, NR7 0DU

Contact:

Claire White tel (01508) 533669
Email: committee.snc@southnorfolkandbroadland.gov.uk
Website: www.southnorfolkandbroadland.gov.uk

PUBLIC ATTENDANCE:

This meeting will be live streamed for public viewing via the following link:
https://www.youtube.com/channel/UCZciRgwo84-iPyRImsTCIng

If a member of the public would like to observe the meeting in person, or speak on an agenda item, please email your request to committee.snc@southnorfolkandbroadland.gov.uk, no later than 5.00pm on Wednesday 4 January 2023.

Large print version can be made available

If you have any special requirements in order to attend this meeting, please let us know in advance.

AGENDA

1. **To report apologies for absence;**

2. **Any items of business which the Chairman decides should be considered as a matter of urgency pursuant to section 100B(4)(b) of the Local Government Act, 1972. Urgent business may only be taken if, "by reason of special circumstances" (which will be recorded in the minutes), the Chairman of the meeting is of the opinion that the item should be considered as a matter of urgency**

3. **To receive Declarations of interest from Members**

   (Please see guidance – page 4)

4. **To confirm the minutes from the meeting of Cabinet held on 5 December 2022**

   (attached – page 6)

5. **Greater Norwich Local Plan Gypsy and Traveller Sites Focused Consultation Report**

   (please note that as this item has been provided by an external source we cannot guarantee that all the papers are accessible)

   (attached – page 17)

6. **Regulation 19 Pre-Submission Publication of the South Norfolk Village Cluster Housing Allocations Plan**

   (attached – page 441)

7. **To establish and enter into a joint venture to deliver a Programme of Mitigation for Nutrient Neutrality**

   (attached – page 694)

8. **Diss and District Neighbourhood Plan Reg.16 Consultation – Additions to the Council's Response**

   (attached – page 713)

9. **Local Government (Miscellaneous Provisions) Act 1976**
   Town Police Clauses Act 1847
   Taximeter Tariff (Table of Fares) Consultation Responses

   (attached – page 718)

10. **Cabinet Core Agenda** (attached – page 736)

11. Exclusion of the Press and Public

To exclude the public and press from the meeting under Section 100A of the Local Government Act 1972 for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A to the Act (as amended)

12. HR and Payroll – Human Resources Management System (HRMS) and Payroll Bureau

(NOT FOR PUBLICATION by virtue of paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972)

(attached - page 738)

Agenda Item: 3

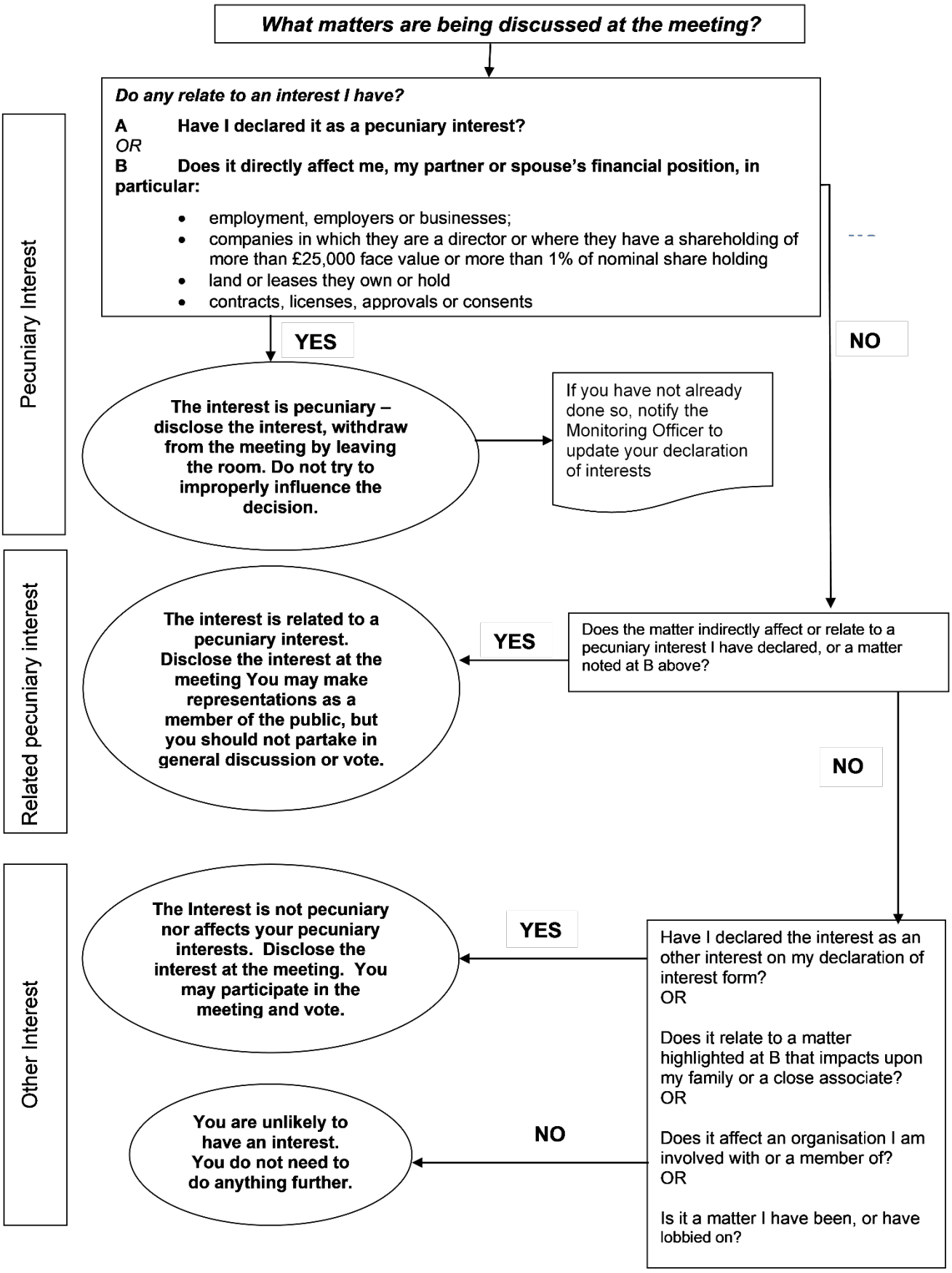
DECLARATIONS OF INTEREST AT MEETINGS

When declaring an interest at a meeting Members are asked to indicate whether their interest in the matter is pecuniary, or if the matter relates to, or affects a pecuniary interest they have, or if it is another type of interest. Members are required to identify the nature of the interest and the agenda item to which it relates. In the case of other interests, the member may speak and vote. If it is a pecuniary interest, the member must withdraw from the meeting when it is discussed. If it affects or relates to a pecuniary interest the member has, they have the right to make representations to the meeting as a member of the public but must then withdraw from the meeting. Members are also requested when appropriate to make any declarations under the Code of Practice on Planning and Judicial matters.

Have you declared the interest in the register of interests as a pecuniary interest? If Yes, you will need to withdraw from the room when it is discussed.
Does the interest directly: 1. affect yours, or your spouse / partner's financial position? 2. relate to the determining of any approval, consent, licence, permission or registration in relation to you or your spouse / partner? 3. Relate to a contract you, or your spouse / partner have with the Council 4. Affect land you or your spouse / partner own 5. Affect a company that you or your partner own, or have a shareholding in If the answer is "yes" to any of the above, it is likely to be pecuniary. Please refer to the guidance given on declaring pecuniary interests in the register of interest forms. If you have a pecuniary interest, you will need to inform the meeting and then withdraw from the room when it is discussed. If it has not been previously declared, you will also need to notify the Monitoring Officer within 28 days.
Does the interest indirectly affect or relate any pecuniary interest you have already declared, or an interest you have identified at 1-5 above? If yes, you need to inform the meeting. When it is discussed, you will have the right to make representations to the meeting as a member of the public, but you should not partake in general discussion or vote.
Is the interest not related to any of the above? If so, it is likely to be an other interest. You will need to declare the interest, but may participate in discussion and voting on the item.
Have you made any statements or undertaken any actions that would indicate that you have a closed mind on a matter under discussion? If so, you may be predetermined on the issue; you will need to inform the meeting, and when it is discussed, you will have the right to make representations to the meeting as a member of the public, but must then withdraw from the meeting.

FOR GUIDANCE REFER TO THE FLOWCHART OVERLEAF.
PLEASE REFER ANY QUERIES TO THE MONITORING OFFICER IN THE FIRST INSTANCE

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



Agenda Item: 4

CABINET

Minutes of a meeting of the Cabinet of South Norfolk Council, held on Monday 5 December 2022 at 9.00 am.

Committee Members Present:	Councillors: A Thomas (Chairman), A Dearnley, R Elliott, G Minshull and L Neal
Apologies for absence	Councillors: J Fuller and K Mason Billig
Other Member in Attendance:	Councillor: T Laidlaw
Officers in Attendance:	The Managing Director (T Holden), the Director of Place (P Courtier), the Director of People and Communities (J Sutterby), the Director of Resources (D Lorimer), the Assistant Director of Finance (R Fincham), the Assistant Director for Regulatory (N Howard), the Assistant Director ICT/Digital and Transformation, the Assistant Director for Planning (H Mellors), the Governance Manager and Deputy Monitoring Officer (L Mockford), the Growth Delivery Manager (E Larter), the Programme Manager (D Baillie-Murden), the Strategic Growth and Projects Manager (N Cunningham), the Strategy and Intelligence Manager (S Carey), the Senior Heritage and Design Officer, (C Bennett) the Capital and Strategy Accountant (D Slowther), the Housing and Wellbeing Senior Manager (R Dunsire), the Help Hub and Communities Senior Manager (K Gallagher), the National Management Trainee (E Howman), the Growth Projects Lead (T Nelson) and the Democratic Services Manager (C White).

3058 APPOINTMENT OF CHAIRMAN

In the absence of the Chairman and Vice-Chairman it was:

RESOLVED

To appoint Cllr A Thomas as Chairman for the meeting.

3059 MINUTES

The minutes of the meeting of Cabinet held on 31 October 2022 were agreed as a correct record.

3060 ADOPTION OF CONSERVATION AREA APPRAISALS AND BOUNDARY AMENDMENTS FOR BERGH APTON, DITCHINGHAM AND KIMBERLEY CONSERVATION AREAS

The Portfolio Holder, Cllr L Neal introduced the report, which proposed the approval and adoption of an amended conservation area boundary for Kimberley and conservation area appraisals and management guidelines for Bergh Apton, Ditchingham and Kimberley conservation areas.

Cllr Neal informed Cabinet that the conservation area boundaries for these three areas had not been amended since their original designations in 1994. It was, therefore, considered necessary to review the areas, as during this period development could lead to a change in the character and appearance of the conservation areas. The appraisals could recommend extending, removing or leaving unchanged conservation area boundaries.

Members noted that the appraisals involved a site visit with district and parish council members, as well as interested residents in attendance. This had been followed by a statutory consultation on the appraisals.

The appraisals proposed that no boundary changes be made to the conservation areas in Bergh Apton and Ditchingham, but that a slight change be made to extend the Kimberley boundary. The Regulation and Planning Policy Committee had considered the proposals in the report at its meeting on 7 November 2022 and had recommended that they be approved.

The Senior Heritage and Design Officer added that the proposals in the report were part of a comprehensive review of the conservation areas in the District. As well as considering boundaries the appraisals also included conservation management guidelines, to ensure that improvements were made in a sympathetic manner.

The Chairman commended the report and noted that the documents gave a very interesting insight into local communities.

Cllr R Elliott agreed with the Chairman, but pointed out that the ward affected by the changes to the Kimberley Conservation Area was Wicklewood, not North Wymondham as stated in the report.

In response to a query it was confirmed that the recommendation for the reinstatement of white trellising at the Tayler and Green social housing in Ditchingham was advisory, rather than being a feature that would be subject to enforcement.

It was

RESOLVED:

TO RECOMMEND THAT COUNCIL approves

1. The adoption of the proposed change to the boundary of Kimberley Conservation Area.

2. The adoption of the conservation area appraisals and conservation management guidelines for Bergh Apton, Ditchingham and Kimberley Conservation Areas.

The Reason for the Decision

To provide up-to-date information on conservation areas when making planning decisions and to assist in identifying areas where there is the potential for enhancement.

Other Options Considered

None.

3061 STRATEGIC PERFORMANCE, RISK AND FINANCE REPORT FOR QUARTER 2 2022/23

The Portfolio Holder, Cllr A Dearnley, introduced the report, which provided an overview of the performance of the Council against the key outcomes set out in the Delivery Plan for 2022/24.

Members' attention was drawn to the Finance Revenue Dashboard Overview, which showed an adverse variance of £188,000 under Individuals and Families due to pressures on temporary accommodation and the cost-of-living crisis. The report also showed that recovery in Leisure Services was going well, and members were asked to note that investment income was up by £695,000, due to an increase in interest rates, which meant that the Council's finances were in a generally healthy position at the half year position.

In respect of the Capital budget, the forecast was for a spend of £10.6m by the end of the financial year. The report also requested that Refuse Vehicles from the 2023/24 Capital budget be pre-ordered, due to the current long lead in times and that the 23/24 Remote Working Capital Budget of £165,000 be brought forward to 2022/23.

The Assistant Director for Finance informed the meeting that despite being faced with inflationary pressures, officers were working hard to bring spending back in line with budgets by the end of the financial year.

The Chairman noted that the coming winter would be challenging, but that the return being achieved on investments was helping to offset additional expenditure.

In answer to a question about an increase in gate fees for refuse disposal, the Assistant Director for Finance confirmed that these fees could fluctuate widely according to world markets for materials. The Managing Director added that members should be mindful of this issue and make provision for an increase in gate fees when setting next year's budget.

A member referred to the fact that it was unlikely that Big Sky would require a loan from the Council of £2.5m during the financial year, and suggested that

this needed to be reflected with a reduction of income in the revenue budget. In response the Assistant Director for Finance explained that the revenue interest target had been set prudently and was still on target to achieve what was expected. Members noted that the current estimate stood at £1.510m.

The Strategy and Intelligence Manager drew members' attention to page 89 of the agenda (Performance Dashboard Overview), which set out the 29 performance delivery measures. During the Quarter 2 period, 21 measures had met or exceeded their year-end success criteria and were rated green; eight measures had not met the year-end target and were rated amber. These measures would be monitored, and mitigations put in place, where necessary. Members noted that there were no measures that had missed their target by a significant amount (none rated red).

Turning to risks, Cabinet was informed that the following three new strategic risks had been added to the Council's Risk Register:

- S14 - insufficient private and social housing stock to meet the demand on the Council and temporary accommodation.
- P2 - The inability to find Gypsy and Traveller sites to meet the need and enable the Greater Norwich Local Plan to be found sound.
- S15 - As a consequence of the cost-of-living crisis, there may be a significantly increased demand for Council services

Since the last quarterly report two strategic risks had been deleted; these were: A1 (ICT infrastructure failure) – this had been closed as mitigating actions had been implemented and SI1 (Council unable to respond effectively to further waves of the Covid-19 Pandemic) – de-escalated to the operational risk register.

In response to a query regarding possible reduction in planning income caused by nutrient neutrality, the Assistant Director for Planning confirmed that there had not been a major downturn in planning applications because of this issue, but there had been a delay in some planning determinations.

In response to a query about customer satisfaction members were advised that this was the first year of using this measure and it had been found that most of the dissatisfaction found was due to the timeliness and quality of information given. It was anticipated that this measure would improve as the actions in the First-Class Customer Service project were implemented.

The Chairman noted that there were many positives in the report, in particular how many vulnerable residents were supported by the Council's discretionary prevention services and the number of affordable homes delivered in the District. She also asked members to note how well the Council was working as part of the Health and Wellbeing Board to develop and maximise collaboration with health partners.

Members noted that although external funding to support growth was rated at amber there were a number of projects in the pipeline and significant investment would be coming forward in the future.

It was

RESOLVED:

1. To
    a) Note the revenue and capital position for Quarter 2 (variance details in Appendix 1)
    b) Note the 2022/23 performance for Quarter 2 (detail in Appendix 2)
    c) Note the current position with respect to risks and agree the actions to support risk mitigation (detailed in Appendix 3).
    d) Note the mid-year update of the 2022/24 Delivery Plan (detail in appendix 4)
    e) Agree that officers can pre-order Refuse Vehicles from the 23/24 Capital budgets, due to the current long lead in times.

2. **TO RECOMMEND TO COUNCIL** that the 23/24 Remote Working Capital Budget of £165,000 is brought forward to 22/23.

The Reason for the Decision

The report was a factual account.

Other Options Considered

None

3062 TREASURY MANAGEMENT QUARTER 2 REPORT 2022/23

The Portfolio Holder, Cllr A Dearnley, introduced the report, which reviewed the treasury management activity during the first six months of the financial year 2022/23 and reported on the prudential indicators.

Cabinet was informed that the Council's investments totalled £96,383m as at 30 September 2022, which was due to many years of good financial management. This figure included loans and equity in the Council's wholly owned companies of £40.053m. The rise in interest rates had benefitted the Council by nearly £700,000 more than expected, which had compensated for other areas where costs had risen. It was currently forecast that this would result in an additional £300,000 being transferred into General Reserves by the end of the year.

The Capital and Treasury Accountant added that the Council had taken advantage of increasing interest rates, as existing investments at lower rates had matured. So far, the Council had achieved a 4.7 percent return and as high as 6.8 percent on its commercial properties. It was expected that interest rates would peak at five percent in September 2023.

The Managing Director advised the meeting that a cautionary approach should be taken when setting future budgets, as inflationary pressures were likely to be more prolonged than the current high level of interest rates.

RESOLVED:

To:

1. Endorse the treasury activity for the first half of the year and that it complies with the agreed strategy.

2. Note the 2022/23 prudential indicators for the first six months of the year

The Reason for the Decision

The report was a factual account.

Other Options Considered

None.

3063 RURAL ENGLAND PROSPERITY FUND

The Portfolio Holder, Cllr L Neal introduced the report which sought retrospective approval for the Council's Rural England Prosperity Fund (REPF) proposal. South Norfolk had been allocated £915,788 from the fund to support capital projects. However, as the deadline for submitting a proposal was 30 November 2022, which did not align with the Cabinet cycle of meetings, the bid had been signed off by the Leader and senior officers in line with the Constitution, and the report was therefore requesting retrospective approval from Cabinet.

The bid was for the delivery of a roundabout and road network to unlock investment land at Hethel and help create up to 1,000 new jobs, as well as providing a link to the Cambridge Norwich Tech Corridor.

The Strategic Growth Projects Manager added that the bid was a significant opportunity to help in the development of Hethel Engineering. The Council would have two years to spend the allocation, so it was proposed to finalise the design of the project in the first year, with delivery by March 2025.

The scheme would add significant value by creating jobs and helping businesses grow in the key cluster areas of advanced manufacturing and engineering.

The Chairman noted that the Council had already approved £300,000 from the Council's allocation of the Norfolk Business Rates Pool 2020/21 to support delivery of this project, so this was an excellent opportunity to bring the scheme forward and support the Hethel employment land expansion.

It was

RESOLVED:

To:

1. Approve the principal areas of investment as set out in section 4 of the report.

2. Delegate to the Director of Place, in consultation with the Section 151 Officer, the Managing Director and the Leader of the Council, to make any non-substantive changes to the principal areas of investment as required by the Department for Environmental, Food and Rural Affairs.

The Reason for the Decision

To utilise external funding to support the economic growth ambitions of the Council.

Other Options Considered

None

3064 BEST IN CLASS - TEMPORARY ACCOMMODATION

Cabinet considered the report, which presented a business case to address an increase in demand for temporary accommodation in the District.

Cabinet was advised that South Norfolk had a strong track record of delivering housing services and was highly rated by its partner organisations. However, due to the worsening economic climate, the Council was facing a significant increase in homelessness, caused by the pandemic, the cost-of-living crisis and pressures on housing stock. In addition, regionally there had been a 26 percent reduction in the private rental sector.

To address these issues, it was proposed to increase the amount of temporary accommodation stock that the Council directly owned and managed to 43 units. This investment would help mitigate the increasing costs of funding bed and breakfast accommodation.

The prevention of homelessness in the first place was a key priority of the Council and to allow the Core Team to focus on this it was proposed that additional staff be recruited for every ten units of temporary accommodation. The cost of these staff would be paid for by the additional income and would be at nil cost to the Council.

The Chairman emphasised that the proposal was about far more than just housing and that the accompanying support was essential for helping residents to move on to a secured tenancy and to deal with the issues that had required them to seek the help of the Council in the first place.

The Portfolio Holder for Finance and Resources, Cllr Dearnley, noted that the business case made sound financial sense, as the Council would own the properties and it would impact on the revenue budget by reducing costs.

Members noted that external expertise would be required to procure the properties.

In response to a query, Cabinet was informed that it was intended that residents should be in temporary accommodation for no more than six months, however currently this period was on average six to nine months.

RESOLVED:

To:

1. To delegate authority to the Assistant Director of Individuals and Families, in consultation with the Section 151 Officer, the Portfolio Holder for Better Lives and the Portfolio Holder for Finance to purchase individual properties up to £750,000.

2. **TO RECOMMEND THAT COUNCIL** agrees to

   a) Create an additional capital budget of £1,808,000, to purchase additional temporary accommodation and to capitalise the staff costs of any purchases.

   b) The recruitment of 1 x FTE officer for every additional purchase of 10 units of temporary accommodation, which will be paid for by the additional income received from those properties.

The Reason for the Decision

To respond to an increase in demand for Temporary Accommodation in the District.

Other Options Considered

None

3065 REPORT ON SOUTH NORFOLK COUNCIL'S COST OF LIVING RESPONSE

The Help Hub and Communities Senior Manager introduced the report, which set out the Council's initial response to the cost of living crisis and asked Cabinet to support the proposals in it.

Members were reminded that the key areas of high inflation were currently transport, food and energy and it was anticipated that 37 percent of people in South Norfolk would be in fuel poverty after April 2023. Vulnerable groups included those on benefits, low income households, people of pensionable age, households with children and lone parents.

The overarching aim set out in the report was to enable residents, employees and businesses to weather the impacts of the cost of living crisis now and in the future.

Members noted that to help support vulnerable residents a programme had been developed with the following four work streams:

- **Business Support** – including the Business Builder and Regulatory Support.

- **Staff** – support and training to help staff deal with the rising demand on services, alongside the personal impacts of the crisis.

- **Living Well** – ensuring residents had the necessities for everyday life.

- **Participating in Daily Life** – allowing residents to be part of their local communities and carry on with their daily lives.

Work currently being undertaken included the funding of a number of community warm spaces across the District, which had proved very popular. Through the Health and Wellbeing Partnership a lot of work was also being done to provide access to food. Grants of up to £2,000 were available for organisations to undertake food related activities, such as training, equipment and food stock and social supermarkets had been established in Diss and Loddon, which had been identified as priority areas. Social supermarkets were open to everyone and were not restricted to those on benefits. It was anticipated that further social supermarkets would be rolled out elsewhere in the District, in due course.

In order to ensure that this support reached the maximum number of people, communications were being kept as simple as possible by making the Help Hub the key point of contact for all those in need.

The Chairman noted that this was a useful means for members to let their communities know about the help available and she commended the huge amount of work being done by the Help Hub Team.

A member stressed the importance of providing support for businesses and for helping people with debt and welfare advice, in order to help people to help themselves.

The Managing Director added that, as with the earlier Rural England Prosperity Fund report, much of the work being done was to provide opportunities for residents to get higher skilled jobs that would move them away from state support. He also emphasised the importance of using data to target and prioritise those in most need of intervention and confirmed that a further report would be brought to Cabinet on developing the Council's use of internal data analytics to target vulnerable residents in due course.

The Chairman noted that the new LIFT (Low Income Family Tracker) was a very important tool in providing targeted support to some residents who had previously not been in such difficult financial positions.

RESOLVED:

To endorse the proposed programmes and direction of travel of the Council, to support the rise in cost-of-living, as set out in the report.

The Reason for the Decision

To support residents during the cost-of-living crisis.

Other Options Considered

None

3066 ANTI-SOCIAL BEHAVIOUR POLICY

The Portfolio Holder, Cllr G Minshull, introduced the report, which proposed a new Anti-Social Behaviour Policy for adoption. He informed the meeting that the Economy and Environment Policy Committee had considered a range of implications and principles during the development of the Policy, which would help to balance out issues between parties when anti-social behaviour arose and would give officers a clear steer on managing these issues

The Assistant Director for Regulatory informed Cabinet that the Council had a wide range of services for the prevention, intervention and, where necessary, enforcement to prevent anti-social behaviour and the Policy would establish a documented framework that would inform the Council's approach.

Members were asked to note that the Policy took due consideration of vulnerable people and the protection of all residents equally. The Policy also defined what was and, importantly, what was not anti-social behaviour. It also set out the aims of the Policy, how victims would be supported and how anti-social behaviour would be dealt with whilst working with partner organisations.

Members welcomed the Policy and it was

RESOLVED:

TO RECOMMEND THAT COUNCIL agrees the adoption of the proposed Anti-social Behaviour Policy at Appendix 1 of the report.

The Reason for the Decision

To adopt a balanced prevention and intervention enforcement policy that would meet the expectations of recognised good practice.

Other Options Considered

None

3067 CABINET CORE AGENDA

Members noted the latest version of the Cabinet Core Agenda.

3068 EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

To exclude the public and press from the meeting under Section 100A of the Local Government Act 1972 for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A to the Act (as amended).

3069 SOUTH NORFOLK CO-INVESTMENT GRANT FUND APPLICATION – EASTON COMMUNITY CENTRE

Cabinet considered the exempt report, which sought approval for a grant from the Co-investment Grant Fund, to deliver a multi-use community centre off Marlingford Road in Easton.

The Growth Delivery Manager outlined the proposals and responded to a number of queries from members.

It was

RESOLVED:

To agree the recommendations as outlined at paragraph 8 of the report.

The Reason for the Decision

The project will benefit the residents of Easton and wider communities in the area and the application and associated business case is in line with the scheme's criteria.

Other Options Considered

None

(The meeting concluded at 10.25 am)

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Chairman

Agenda Item: 5
Cabinet
9 January 2023

Greater Norwich Local Plan Gypsy and Traveller Sites Focused Consultation Report

Report Author(s): Mike Burrell
Greater Norwich Planning Policy Manager
01603 222761
mike.burrell@norfolk.gov.uk

Portfolio: External Affairs and Policy, and Stronger Economy

Ward(s) Affected: All

Purpose of the Report:
This report seeks Cabinet approval to undertake a focused public consultation on the allocation of Gypsy and Traveller sites in the Greater Norwich Local Plan (GNLP). The consultation includes 10 favoured sites, a reasonable alternative site, proposed changes for the submitted contingency site and 3 unreasonable sites. It also provides the opportunity for people to put forward additional sites for Gypsy and Traveller accommodation.

The consultation is scheduled to take place from 30th January to 13th March 2023 with the opportunity for Cabinets to agree the final sites in early June prior to final site information and representations being sent to the inspectors later in June. The GNLP examination hearings sessions on Gypsies and Travellers sites are expected to take place in late July.

It is anticipated that the inspectors will subsequently include Gypsy and Traveller sites in their main modifications to the GNLP. The main modifications are expected to be consulted on in early Autumn 2023 allowing the inspectors to produce their report on the plan before the end of 2023 and adoption to take place early in 2024.

Recommendations:
It is recommended that Cabinet:

1. Approves the focused consultation on the Greater Norwich Local Plan proposed allocations for Gypsy and Traveller sites; and

2. Agrees to delegate authority to the Assistant Director – Planning, in consultation with the Leader and Portfolio Holder for Stronger Economy, to agree consultation documentation and materials prior to the public consultation.

1. Summary

1.1 In resolving to submit the GNLP for independent examination the Council agreed to "*proactively identify and bring forward sufficient Gypsy and Traveller sites to meet identified needs in accordance with the criteria-based policies of the current and emerging Development Plans*".

1.2 During the GNLP hearing sessions in February/March 2022 it was made clear that Gypsy and Traveller accommodation needs must be addressed through site allocations in the plan. This is in accordance with the expectations set out in paragraph 68 of the National Planning Policy Framework (NPPF) and allied guidance specifically for Gypsies and Travellers in Planning Policy for Travellers Sites (PPTS) (2015).

1.3 No potential Gypsy and Traveller sites were submitted to the GNLP for consideration prior to its submission for independent examination. Subsequently, officers have undertaken an extensive process of proactive engagement and site assessment to identify suitable allocation sites.

1.4 This report seeks Cabinet agreement to undertake a Focused Consultation on the sites which have been identified from this work. Furthermore, to ensure that the best and most appropriate sites are chosen, the consultation gives landowners a further chance to submit land for inclusion in the GNLP, but this will be strictly limited to the promotion of Gypsy and Traveller sites.

1.5 Following the close of the consultation the GNLP team will process and analyse the responses received and finalise the favoured site allocations for consideration at Cabinets in June. The finalised sites information and representations will be provided to the inspectors and published. The sites will then be subject to additional hearing sessions in late July, with the outcome being the subject of main modifications to the plan.

1.6 The main modifications are expected to be consulted on in Autumn 2023 with adoption planned for early 2024.

2. Background

2.1 Policy regarding the provision of Gypsy and Traveller sites is set out in the NPPF. Paragraph 68 states that local plans should include specific deliverable sites for years 1 to 5 of the plan period and developable sites for

years 6-10 and where possible years 11-15. Allied guidance to the NPPF specifically for Gypsies and Travellers is in the PPTS. This makes the same point at paragraph 10 about local plans having '*specific deliverable sites sufficient to provide 5 years-worth of sites against their locally set targets… [and] specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15'*.

2.2 The PPTS also contains a definition of Gypsies and Travellers for planning purposes which focuses on people who continue to lead a nomadic lifestyle. This is known as the PPTS need, as opposed to the full need, which is referred to as the ethnic need.

2.3 While the PPTS does not require allocations to meet the needs of Gypsies and Travellers who have ceased to travel, a very recent Court of Appeal decision (dated 31st October 2022) has found that this distinction can discriminate against ethnic Gypsies and Travellers, in particular the disabled and elderly who are unable to travel.

2.4 The councils must decide how many Gypsy and Traveller pitches are required ('the need') by gathering evidence, which is then tested as part of the independent examination of the plan. Evidence has been produced by RRR Consultancy on behalf of the councils and is available online as B8.3. This most recent Gypsy and Traveller Accommodation Assessment (GTAA) identifies a potential need in the Greater Norwich area for 50 residential pitches to meet the total ethnic need. Since the evidence was completed, the additional capacity to be provided through refurbishment work at the existing site at Swanton Road site in Norwich has been reduced by 3 pitches. As a result of this reduced commitment, 53 additional pitches will be needed.

2.5 In order to provide some flexibility and choice and to minimise the risks of non-delivery and any implications of the Court of Appeal decision, favoured sites should be identified for consultation which are capable of delivering at least the minimum number of pitches required to meet the ethnic definition in the earlier years of the plan. A criteria-based policy set out within Policy 5 of the plan provides the potential for further windfall sites to come forward in suitable locations which could meet needs in the later years of the plan. These windfall pitches also provide additional flexibility.

2.6 No sites for Gypsies and Travellers were submitted for allocation through the GNLP plan-making process between 2016 and its submission in July 2021. Therefore, the GNLP as submitted does not contain any Gypsy and Traveller site allocations.

2.7 In considering the submission of the GNLP back in July 2021 the Council resolved specifically to "*commit to proactively identify and bring forward sufficient Gypsy and Travellers sites to meet identified needs in accordance with the criteria-based policies of the current and emerging Development Plans".* The purpose of this was to allow the Gypsy and Traveller accommodation issue to be addressed through the examination hearings without adding undue additional delay to plan adoption.

2.8 The GNLP was submitted for examination by inspectors on 30th July 2021. Their role is to undertake an independent assessment of the overall "soundness" of the plan and to verify that it satisfies the relevant statutory and regulatory requirements for its preparation. As part of the submission of the plan, the councils formally requested that the appointed inspectors recommend such modifications to the plan as may be necessary to ensure legal compliance and soundness in accordance with Section 20 (7C) of the Planning and Compulsory Purchase Act 2004 (as amended).

2.9 Public hearings took place in February and March 2022, with further sessions on the outstanding issues of nutrient neutrality and the housing trajectory to be reconvened in late March 2023 and on Gypsies and Travellers in late July 2023.

3. Examination process January 2022 to present

3.1 The partnership wrote to the inspectors on 4th January 2022 (D5.4) in relation to the Part 1 Matters Issues and Questions to seek advice on how to progress the issue of Gypsies and Travellers through the examination. The inspectors responded on 19th January 2022 (D5.4A) with the view that any sites identified would need to be subject to dedicated public consultation and examination, with any modifications necessary for soundness to be incorporated into any main modifications. This view was offered without prejudice to discussions to take place during the hearing sessions.

3.2 During the GNLP hearing sessions in February/March 2022 the inspectors indicated that they would require Gypsy and Traveller accommodation needs to be addressed through site allocations in the plan in accordance with the expectations set out in paragraph 68 of the NPPF.

3.3 Following the hearing sessions officers from the GNLP team undertook further work to identify Gypsy and Traveller allocations. A report was written for consideration by Cabinets in July 2022 which identified three potential sites for consultation at Wymondham Recycling Centre, the Costessey Contingency Site and Cawston. Consultation was anticipated to take place from 25th July to 7th September 2022. Norwich City Council Cabinet supported undertaking the consultation at its meeting on 6th July. South Norfolk did not do so at its meeting on 11th July and as a result Broadland did not take the matter to their Cabinet meeting. Since decisions on the GNLP must be unanimous this meant the focused consultation on Gypsy and Traveller sites could not take place as anticipated. South Norfolk's concerns centred around the nature of the consultation and specific issues in relation to the proposed Costessey site.

3.4 Since July a number of letters have been exchanged between the partnership and the inspectors regarding the issue of Gypsy and Traveller sites to

establish the most appropriate way forward. These can be found in section D5.4.of the GNLP website

4. The current position

4.1 The inspectors' most recent letter (D5.4G) provides the timetable for the rest of the examination as referenced in this report, making it clear that strict adherence to this timetable is critical to the timing of the modification stage and the adoption date of the plan. It also requested a response on whether the partnership will update its evidence on Gypsy and Traveller needs in the light of the Court of Appeal decision.

4.2 The partnership's response (document D5.4H) stated that the assessment of Traveller site needs would be reviewed in the light of the legal decision through an addendum to current evidence which would make clear how the needs of those who have ceased to travel for reasons of age or infirmity are to be dealt with. It explained that the addendum would be provided by the consultancy which produced the Greater Norwich Gypsy and Traveller Accommodation Assessment by early December.

4.3 The response also stated that legal advice has been commissioned on this issue.

4.4 Officers have undertaken a process of extensive proactive engagement and site assessment to identify suitable allocation sites over recent months. This includes:

- Officers have contacted local agents and development promoters asking them to bring forward any options where there are willing landowners. Agents Brown & Co have been commissioned to contact landowners on behalf of the Partnership.
- All GNLP new and carried forward residential, employment and mixed use allocations have been reviewed to see if any of them have potential to accommodate Gypsy and Traveller pitches.
- A review of publicly owned land options has been done.
- The Norfolk and Suffolk Gypsy, Roma and Traveller Service has been commissioned to engage with the Gypsy and Traveller community on the partnership's behalf.

4.5 All the sites identified have been assessed in a standardised manner. It is important to have clear criteria to assess all the Gypsy and Traveller sites, to apply the methodology consistently and to include the findings in public consultation. This process ensures that sites are selected or ruled out on their planning merits and that unsuitable sites are ruled out at an early stage. The assessment criteria were provided to the inspectors as part of the letter dated 2 September (D5.4D) . They are based on the Housing and Economic Land Availability Assessment (HELAA) criteria that the partnership used to assess all potential development sites with adjustments for specific issues that Gypsy and Traveller sites raise such as the manoeuvring of trailers and

caravans and the vulnerability of people living in caravans during flood events.

5. Proposed action

5.1 It is proposed to undertake public consultation on potential Gypsy and Traveller sites for allocation in the GNLP between 30th January and 13th March 2023. It is crucial that the consultation takes place between these dates so that it is closed prior to the purdah period for the local elections in May.

5.2 As set out above, the evidenced requirement is for 53 pitches to meet total need under the ethnic definition of Gypsies and Travellers. Sites in the planning applications pipeline have been taken account of in the evidenced need.

5.3 In line with the national policy requirements identified in paragraph 11 above, a minimum of 31 pitches would need to be provided through site allocations within the initial 5-year period from April 2022 to March 2027. Ten pitches would need to be provided as either site allocations or by the identification of broad locations for sites between April 2027 and March 2032. Greater flexibility is possible over provision for the remaining years of the plan to 2038, and windfall could play a role here.

5.4 Work on the evidence of need to reflect the implications of the Court of Appeal decision is ongoing but the current advice is that the need should be derived from the ethnic population rather than the PPTS. The very recent appeal court decision suggests that providing sufficient pitches to meet ethnic need will de-risk the examination and reduce the potential for legal challenge. Legal advice has confirmed that this is the case.

5.5 As a result of the above, the intention is to consult on 10 favoured sites along with a reasonable alternative site and the potential opportunity provided by a proposed change to the submitted housing contingency site as follows:

Table 1: Favoured Sites

Reference	Address	Pitches	Pitches Delivered years 1 to 5
GNLP5004	Land off Buxton Road, Eastgate, Cawston	4	4
GNLP5005	Land at Strayground Lane, Wymondham Recycling Centre	2	0
GNLP5009	Land off Hockering Lane, Bawburgh	6	6
GNLP5014	A47 North Burlingham Junction	15	15

GNLP5019	Land north of Shortthorn Road, Stratton Strawless	4	4
GNLP5020	Romany Meadow, The Turnpike, Carleton Rode	6	6
GNLP5021	Land at the Old Produce Shop, Holt Road, Horsford	6	6
GNLP5022	Land at the Oaks, south-east of Letter Box Cottage, Reepham Road, Foulsham	5	5
GNLP5023	Land off Strayground Lane, Wymondham	10	0
GNLP5024	Land off Upgate Street, Carleton Rode	4	4
Total		62	50

Table 2: Reasonable Alternative			
Reference	Address	Pitches	Pitches Delivered years 1 to 5
GNLP5013	Land at Ketteringham Depot	10	0
Total		10	0

Table 3: Proposed change to Contingency Site			
Reference	Address	Pitches	Pitches Delivered years 1 to 5
GNLP0581/2043	Land off Bawburgh Lane, north of New Road and east of the A47 (Costessey contingency site)	18	0
Total		18	0

5.6 The 10 favoured sites provide the opportunity to deliver up to 62 pitches against the overall ethnic need of 53 pitches. This provides flexibility should sites drop out and/or choice if some favoured sites are found to be unsuitable through the consultation.

5.7 Current expectations, as set out in the tables above, are that 50 of these pitches could be delivered in years 1 to 5 and 12 could be delivered in years 6 to 10. This would more than meet the NPPF requirements (31 pitches in years 1 to 5 and 10 in years 6 to 10). The consultation will provide further evidence on deliverability.

5.8 Ketteringham Depot is recommended as a reasonable alternative. It is not part of the favoured approach due to concerns over accessibility and integration with neighbouring uses, though potential remains.

5.9 The Costessey Contingency Site is in a highly accessible location and continues to provide an excellent opportunity if the wider contingency housing site comes forward.

5.10 Windfall delivered through policy 5 plus the Costessey Contingency Site could meet needs later in the plan period or could provide a buffer against non-delivery to help ensure the 53-pitch need will be met. It is anticipated that this would also meet NPPF requirements.

5.11 Three sites, two in Denton and one on London Road, Wymondham, were proposed through the South Norfolk Village Clusters Plan. These have been assessed as unreasonable for the reasons set out in Appendix A which provides a summary of key considerations in relation to all sites. Consultation respondents will be able to comment on the non-inclusion of these sites.

5.12 The existing Gypsy and Traveller Transit site at Long Lane, Bawburgh is to be retained in its current use and improved with new investment. Consequently, it does not form part of this consultation on permanent Gypsy and Traveller sites.

5.13 Appendix B to this report is a map showing the distribution of the favoured, reasonable alternative, contingency and unreasonable sites.

5.14 The Site Policies document in Appendix C of this report will be the main consultation document.

5.15 Detailed site appraisals in the Site Assessment Information document which is in Appendix D of this report will be available to assist consultation responses. The legally required Sustainability Appraisal and Habitat Regulations Assessments on the environmental impacts of proposed site allocations are in Appendices E and F of this report. Consultation respondents will also be able to comment on these supporting evidence documents.

5.16 In the interests of efficiency and continuing the successful approach taken at previous GNLP consultations, responses will be encouraged online, although written responses will also be accepted either by post or via email.

5.17 Publicity relating to the consultation will be undertaken in line with the Communications Protocol agreed by the Greater Norwich Development Partnership (GNDP) Board in 2017 (updated 2019). Cllr Shaun Vincent as chair of the GNDP will be the nominated spokesperson for all media. All media responses will be co-ordinated by the Broadland and South Norfolk Joint Marketing and Communications team as communications lead for the project, in liaison with other partners.

5.18 The GNLP has been prepared with regard to the Public Sector Equality Duty as defined by the Equality Act 2010 and this consultation represents a further positive step in meeting the Public Sector Equality Duty. Gypsies and Travellers are a key ethnic minority in the area and making specific site allocations in the plan to meet ethnic need, potentially in tandem with other sources of delivery, would give added assurance that their housing needs are being addressed in line with current requirements.

5.19 Following the close of the consultation on 13th March the GNLP team will process and analyse the responses received and finalise the preferred site allocations for consideration at Cabinets in June. The new council administrations formed after the May elections will need to take the decision on submitting the Gypsy and Traveller sites into the GNLP process. If this is agreed the finalised sites information and representations will be provided to the inspectors for their consideration. Hearing sessions and possible modifications to the plan will follow.

5.20 The main modifications are expected to be consulted on in Autumn 2023 allowing the Inspectors to produce their report on the plan before the end of 2023 and adoption to take place early in 2024.

6. Written statement

6.1 A written statement from the Secretary of State Michael Gove was published on 6th December 2022. A supporting letter was also sent to local planning authorities. The written statement sets out further changes to the planning system alongside the Levelling Up and Regeneration Bill which aim to "*place local communities at the heart of the planning system*". It contains a number of commitments to consultation and a small number of clear policy statements.

6.2 For the Greater Norwich authorities, the main impact is likely to be on how 5-year land supply will be calculated in the future. A key statement is that "We will end the obligation on local authorities to maintain a rolling five-year supply of land for housing where their plans are up-to-date". This means that progressing the GNLP to adoption will result in 5-year land supply requirements not applying in the area for an as yet undefined period.

6.3 Other measures to "*give local communities a greater say in what is built in their neighbourhood*" remain to be clarified through consultation. In general, future changes to calculating housing numbers are most likely to impact on heavily constrained local planning authorities, for example those with green belts, which are at earlier stages of plan-making. As Greater Norwich has a submitted plan, these changes are less likely to have an impact on its examination.

7. Other options

7.1 If a focused consultation is not undertaken on potential allocation sites for Gypsies and Travellers it will prevent the inspectors from undertaking a subsequent consultation on the modifications. Such modifications are very likely to be necessary for the soundness of the GNLP. Therefore, choosing not to agree to undertake the proposed consultation carries a strong likelihood of the GNLP being found unsound. Officers do not consider that there is evidence to justify this option as reasonable and therefore consider there are no other options to present.

8. Issues and risks

8.1 **Resource Implications** – The focused consultation will be undertaken within the current GNLP officer resource and covered by the existing GNLP budget.

8.2 **Legal Implications** – The consultation is required to ensure a sound plan and consequently relates to the regulatory framework associated with plan making. Statutory requirements for Sustainability Appraisal and Habitats Regulations Assessment are also part of this focused consultation.

8.3 **Equality Implications** – The GNLP has been prepared with regard to the Public Sector Equality Duty, as defined by the Equality Act 2010. This consultation represents a positive step in meeting the Public Sector Equality duty. The recent court decision on meeting needs should be taken into account in decision making.

8.4 **Environmental Implications** – A Sustainability Appraisal and Habitat Regulations Assessment have been undertaken alongside the site assessment process to ensure that the environmental impacts of proposed site allocations are fully understood.

8.5 **Crime and Disorder** – The report does not have any direct implications for the council's crime and disorder considerations.

8.6 **Risks** - Failure to consult on, and enable the allocation of, sufficient sites for Gypsy and Traveller accommodation is likely to carry a significant risk that the GNLP will be found unsound.

8.7 The timely adoption of the GNLP is an important element in ensuring that the councils continue to maintain an up-to-date development plan. This is important to ensure that the identified development needs of Greater Norwich are effectively met so that the councils can continue to give full weight to their planning policies in the determination of planning applications.

9. Conclusion

9.1 It is recommended that Cabinet gives approval for the Gypsy and Traveller Focused Consultation to go ahead as it forms an important part in the examination of the GNLP. Allocating sites for Gypsies and Travellers through

the main modifications to the GNLP is needed both to address identified accommodation needs and to support a sound plan.

10. Recommendations

It is recommended that Cabinet:

10.1 Approves the focused consultation on the Greater Norwich Local Plan (GNLP) proposed allocations for Gypsy and Traveller sites; and

10.2 Agrees to delegate authority to the Assistant Director – Planning, in consultation with the Leader and Portfolio Holder for Stronger Economy, to agree consultation documentation and materials prior to the public consultation.

Background papers

The documents to support the GNLP Gypsy and Traveller Focused Consultation are the:

- Site Policies document (the main consultation document -see Appendix C below)
- Site Assessment Information document (Appendix D below).
- Sustainability Appraisal of the Greater Norwich Local Plan Gypsy and Traveller Sites and Policies by Lepus Consulting (Appendix E below)
- Habitats Regulations Assessment of published Proposed Submission Greater Norwich Local Plan – Gypsy and Traveller Sites Addendum by The Landscape Partnership (Appendix F below).
- A review of new and carried forward residential, employment and mixed-use allocations which concludes that none of the allocations in the GNLP have the potential to accommodate pitches for Gypsies and Travellers (see Appendix G below).

Other documents that are part of the GNLP's examination evidence library which relate to Gypsies and Travellers are:

- B8.1 Caravans and Houseboats Study, October 2017, RRR Consultancy Ltd
- B8.2 Gypsy and Travellers Addendum, January 2021, RRR Consultancy Ltd
- B8.3 Greater Norwich Gypsy & Traveller Accommodation Assessment Draft Report, June 2022, RRR Consultancy Ltd
- D3.6 Topic Paper - Policy 5 Homes, September 2021
- D3.7 Topic Paper - Policy 5 Homes - Appendices A to D, September 2021
- D5.4 Inspectors' Matters Issues and Questions (Part 1) - GNLP letter on Matter 6 (Homes) Issue 3: Gypsies and Travellers, Travelling Showpeople and Residential Caravans, 4th January 2022
- D5.4A Inspectors' response letter regarding sites for Gypsies and Travellers, 19th January 2022

- D5.4B A letter from the partnership explaining the position following the July Cabinet, 26th July 2022.
- D5.4C The inspectors' response to the partnership letter of 26th July, 9th August 2022.
- D5.4D A letter from the partnership in response to the inspectors' letter of 9th August, 2nd September 2022.
- D5.4E The inspectors' response to the partnership letter of 2nd September, 14th October 2022.
- D5.4F A letter from the partnership in response to the inspectors' letter of 14th October, 17th October 2022.
- D5.4G a letter from the inspectors sent on 11th November.
- D5.4H partnership response to the above letter.

Appendix A Summary of key considerations in relation to the sites

Introduction

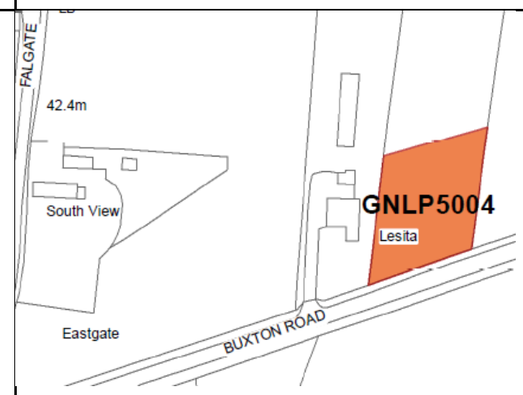
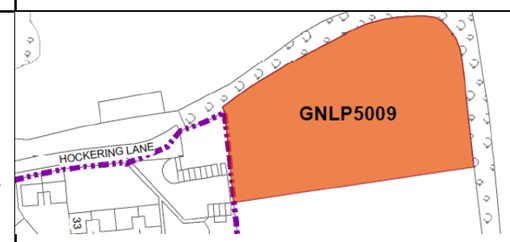
15 potential sites for Gypsy and Traveller accommodation have been assessed in detail. Three of these were promoted through the public consultation for the South Norfolk Village Clusters Housing Allocations Plan (VCHAP), with the remainder resulting from proactive engagement over recent months as set out in this report.

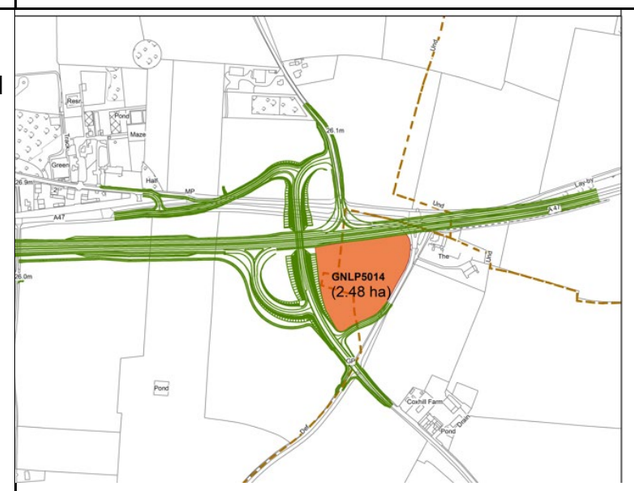
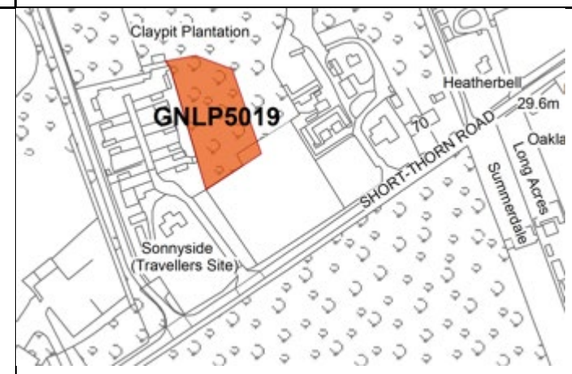
The sites have been categorised into four tables in this appendix as follows:

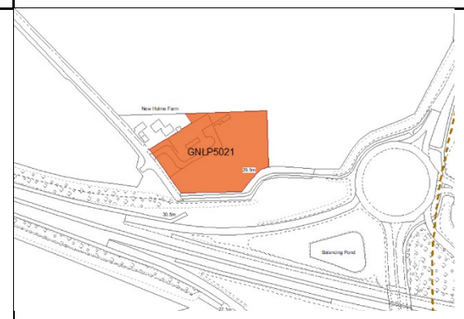
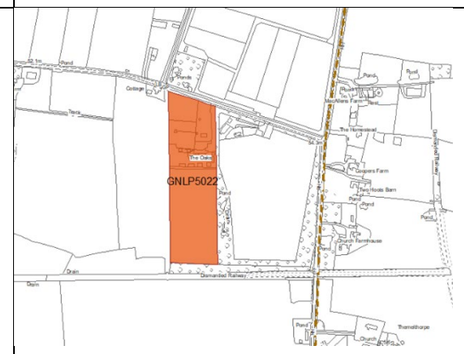
- Table 1: Favoured Sites
- Table 2: Reasonable Alternative
- Table 3: Proposed change to Contingency Site
- Table 4: Unreasonable Sites

Brief details are given for each site, along with a summary of deliverability conclusions. This assessment is based on and supported by the Site Assessment Information document (see Appendix D below).

Table 1: Favoured Sites

Site Reference	Site Address	Estimate of Pitches	Timeframe for Delivery	Opportunities and Constraints	Site Maps
GNLP5004	Land off Buxton Road, Eastgate, Cawston BROADLAND	4	3-5 years	The private landowner has sold land for a Gypsy and Traveller site in the past and is content to promote this site for Gypsies and Travellers, having previously had an appeal for a residential property on the site refused. The site is somewhat remote from services and facilities, but development could take place here within 3-5 years.	
GNLP5005	Land at Strayground Lane, Wymondham Recycling Centre SOUTH NORFOLK	2	6-10 years	Norfolk County Council intend to relocate the recycling centre and are willing to sell it as a Gypsy and Traveller site. However, the site will not be available prior to 2027. Development would be subject to investigations about possible contamination.	
GNLP5009	Land off Hockering Lane, Bawburgh SOUTH NORFOLK	6	3-5 years	The private landowner has sold land for a Gypsy and Traveller site in the past and is content to promote this site for Gypsies and Travellers. There is a Cadent gas pipeline that runs north to south through the western part of the site and this is likely to dictate that the majority of pitches would be positioned towards the middle or eastern part of the site. Other considerations are the possible landscape impacts on the River Yare, and, to a lesser extent, nearby heritage assets and the Bawburgh Conservation Area. Nevertheless, there is development potential here and a scheme could come forward in 3-5 years.	

Site Reference	Site Address	Estimate of Pitches	Timeframe for Delivery	Opportunities and Constraints	Site Maps
GNLP5014	A47 North Burlingham Junction BROADLAND	15	3-5 years	The A47 improvements will sub-divide neighbouring land and reduce its agricultural potential. They will also create new vehicular accesses. Site GNLP5014 is a 2.48 ha broad location for development with the opportunity to provide 15 pitches on 1 ha of this land and landscaping to mitigate noise from the A47 and visual impacts on the surrounding landscape. While the site is somewhat remote from services and timescales are dependent on the trunk road scheme, delivery is anticipated in years 1 to 5.	
GNLP5019	Land at Shortthorn Road, Stratton Strawless BROADLAND	4	1-3 years	This site currently comprises 9 pitches and a community building. The proposal is to submit a revised scheme for 8 pitches on an area of land that has been granted permission for 4 pitches. The proposal would expand the site to a total of 17 pitches. While somewhat remote from services, this is an existing Gypsy and Traveller site which the owners would be likely to progress quickly.	
GNLP5020	Romany Meadow, The Turnpike, Carleton Rode SOUTH NORFOLK	6	1-3 years	This site currently comprises 6 pitches and the proposal is to expand on adjacent land to provide up to an additional 6 pitches. While somewhat remote from services, this is an existing Gypsy and Traveller site on which additional pitches could come forward quickly. If approved, the Romany Meadow site would grow to a total of 12 pitches.	

Site Reference	Site Address	Estimate of Pitches	Timeframe for Delivery	Opportunities and Constraints	Site Maps
GNLP5021	Land at the Old Produce Shop, Holt Road, Horsford BROADLAND	6	1-3 years	This site currently comprises 1 pitch and the proposal is to expand it by 6 pitches within the current curtilage of the site. The land was previously a shop selling fruit and vegetables but has been a private Gypsy and Traveller site for nearly 10 years. The owner would be likely to progress this proposal quickly and if approved the site would grow to a total of 7 pitches.	
GNLP5022	Land at the Oaks, south-east of Letter Box Cottage, Reepham Road, Foulsham BROADLAND	5	1-3 years	This site currently has 2 pitches and Broadland District Council is discussing regularising all the development on the site with the landowner. The landowner wants to expand the site by 5 pitches, bringing the total number of pitches to 7. Development would need to be in the northern part of the site, as a gas pipeline runs east to west below the central part of the site. While somewhat remote from services and located next to rural roads, this is an existing Gypsy and Traveller site on which additional pitches could come forward quickly over the next 1-3 years.	
GNLP5023	Land off Strayground Lane, Wymondham SOUTH NORFOLK	10	5-10 years	The private landowner has stated that the land is available immediately and is willing to sell it as a private or publicly funded Gypsy and Traveller site. Investigations for possible contamination and ground stability will be required as part of the land was previously used as a landfill site. 10 pitches is considered to be appropriate given the highway constraints posed by the narrowness of Strayground Lane and Whartons Lane and delivery would be likely to need to be delayed until after the waste and recycling centre has closed.	

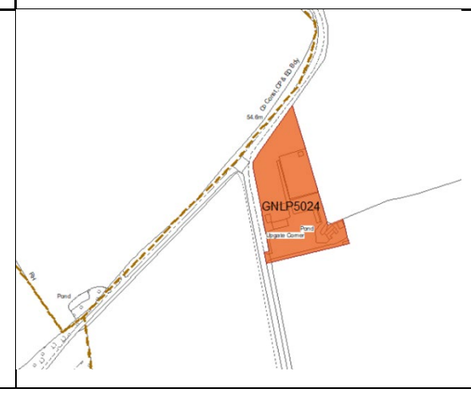
Site Reference	Site Address	Estimate of Pitches	Timeframe for Delivery	Opportunities and Constraints	Site Maps
GNLP5024	Land off Upgate Street, Carleton Rode SOUTH NORFOLK	4	1-3 years	This site currently comprises 2 pitches and the proposal is to expand within the current curtilage of the site by 4 pitches to grow the site to a total of 6 pitches. While somewhat remote from services and located next to rural roads with a bend nearby which will require further investigation and potentially mitigation, this is an existing Gypsy and Traveller site on which additional pitches could come forward quickly.	

Table 2: Reasonable Alternative

Site Reference	Site Address	Estimate of Pitches	Timeframe for Delivery	Opportunities and Constraints	Site Plan
GNLP5013	Land at Ketteringham Depot SOUTH NORFOLK	10	5-10 years	This 0.7 ha brownfield site is owned by South Norfolk District Council. It is currently used as a depot which is expected to be relocated and a Gypsy and Traveller site could be delivered over the next 5 to 10 year period. Site constraints include possible contamination, the compatibility of neighbouring uses and the distance to local services in Hethersett via a necessarily indirect route as it is not practicable to cross the A11 to the north of the site.	

Table 3: Proposed change to Contingency Site

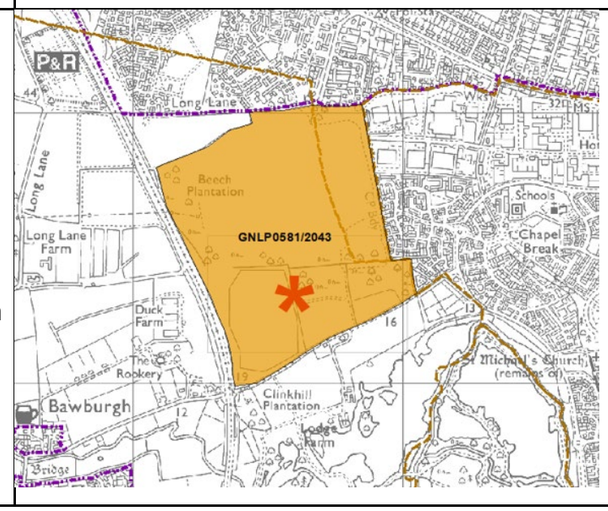
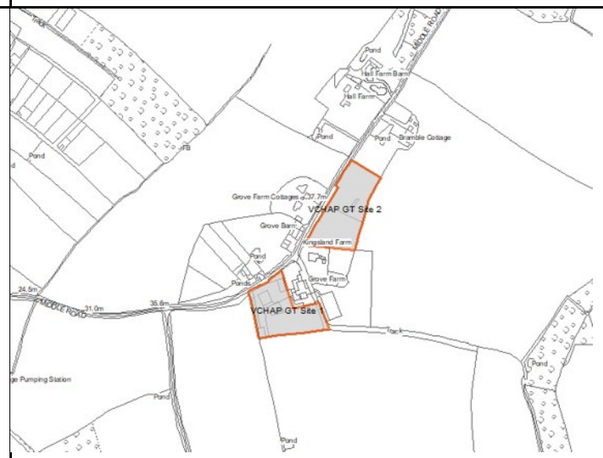
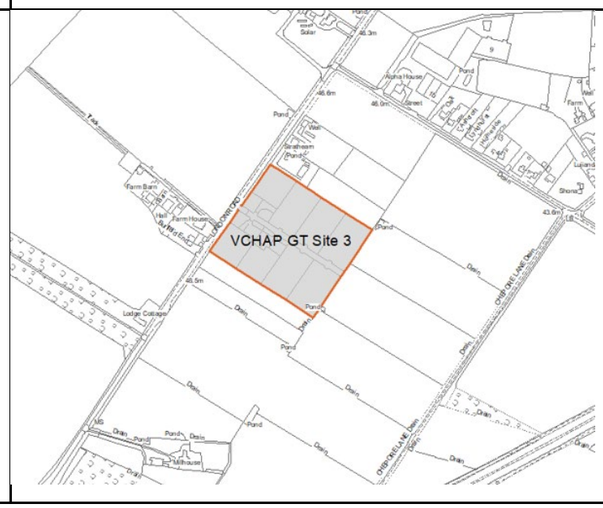
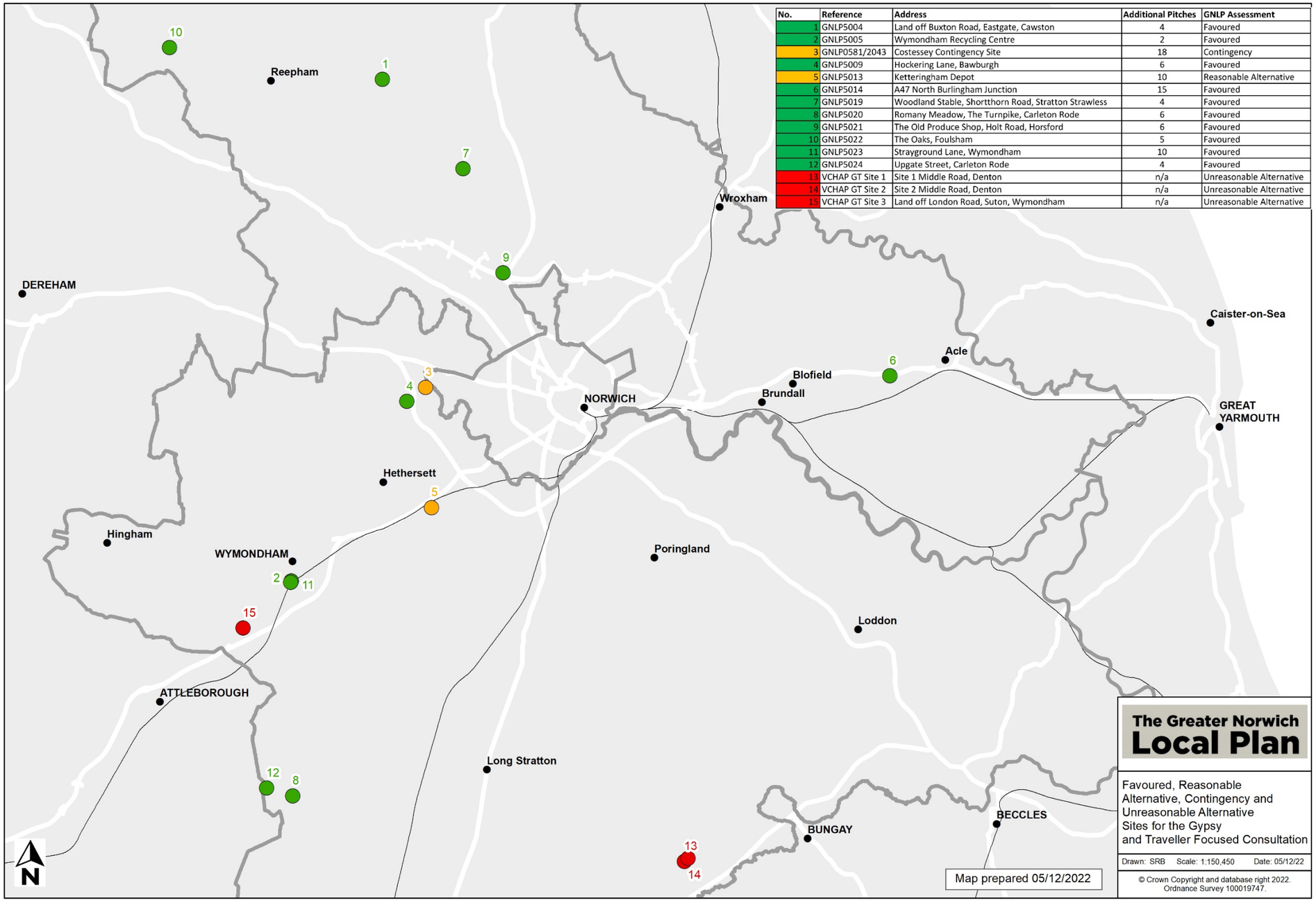
Site Reference	Site Address	Estimate of Pitches	Timeframe for Delivery	Opportunities and Constraints	Site Plan
GNLP0581/2043	Land off Bawburgh Lane, north of New Road and east of the A47 (Costessey Contingency Site) SOUTH NORFOLK	18	4-6 years	A large site in Costessey is identified as a contingency site for housing in the submitted GNLP. The role of the contingency site has been discussed at the examination. The inspectors' conclusions on this have not yet been released. Subject to agreement from the landowners, the southern portion of the site is identified as a potential broad contingency location for a Gypsy and Traveller site (denoted by a star on the map to the right). To ensure good planning, the need for a Gypsy and Traveller site at this broad location would need to be evidenced if and when the wider contingency site for housing is brought forward for development.	

Table 4: Unreasonable Sites

Site Reference	Site Address	Estimate of Pitches	Timeframe for Delivery	Opportunities and Constraints	Site Plan
VCHAP GT Site 1 VCHAP GT Site 2	Sites at Denton, Middle Road SOUTH NORFOLK	n/a	n/a	Planning constraints relate to the highway implications for Middle Road, the distance to facilities and the impact on the setting of adjacent listed buildings. These issues were cited in planning applications that were refused and appeals that were dismissed in 2004 and 2006 and continue to apply.	
VCHAP GT Site 3	Land off London Road, Suton, Wymondham SOUTH NORFOLK	8	n/a	Planning constraints are accessibility to local services and facilities, as well as impacts on landscapes and heritage assets. These issues were tested at a dismissed appeal in 2021. The site is known as Hollyoaks and the planning reference is 20190330.	

Appendix B - Distribution Map of the favoured, reasonable alternative, contingency and unreasonable sites.



No.	Reference	Address	Additional Pitches	GNLP Assessment
1	GNLP5004	Land off Buxton Road, Eastgate, Cawston	4	Favoured
2	GNLP5005	Wymondham Recycling Centre	2	Favoured
3	GNLP0581/2043	Costessey Contingency Site	18	Contingency
4	GNLP5009	Hockering Lane, Bawburgh	6	Favoured
5	GNLP5013	Ketteringham Depot	10	Reasonable Alternative
6	GNLP5014	A47 North Burlingham Junction	15	Favoured
7	GNLP5019	Woodland Stable, Shortthorn Road, Stratton Strawless	4	Favoured
8	GNLP5020	Romany Meadow, The Turnpike, Carleton Rode	6	Favoured
9	GNLP5021	The Old Produce Shop, Holt Road, Horsford	6	Favoured
10	GNLP5022	The Oaks, Foulsham	5	Favoured
11	GNLP5023	Strayground Lane, Wymondham	10	Favoured
12	GNLP5024	Upgate Street, Carleton Rode	4	Favoured
13	VCHAP GT Site 1	Site 1 Middle Road, Denton	n/a	Unreasonable Alternative
14	VCHAP GT Site 2	Site 2 Middle Road, Denton	n/a	Unreasonable Alternative
15	VCHAP GT Site 3	Land off London Road, Suton, Wymondham	n/a	Unreasonable Alternative

Appendix C - Site Policies

Contents

Introduction 2
Context 2
Background 3
Meeting the Need for Pitches 4
Consideration of Equalities Issues 6
Responding to this Consultation 6
Future Work in Allocating Gypsy and Traveller Sites 7
Favoured Sites 8
Policy GNLP5004 Land off Buxton Road, Cawston 8
Policy GNLP5005 Wymondham Recycling Centre, Strayground Lane, Wymondham 10
Policy GNLP5009 Hockering Lane, Bawburgh 12
Policy GNLP5014 A47 North Burlingham Junction 14
Policy GNLP5019 Woodland Stable, Shortthorn Road, Stratton Strawless 16
Policy GNLP5020 Romany Meadow, The Turnpike, Carleton Rode 18
Policy GNLP5021 Land of Holt Road, Horsford 20
Policy GNLP5022 Land off Reepham Road, The Oaks, Foulsham 22
Policy GNLP5023 Land of Strayground Lane, Wymondham 25
Policy GNLP5024 Upgate Street, Carleton Rode 27
Reasonable Alternative Site 29
Policy GNLP5013 Ketteringham Depot Land west of Station Lane, Ketteringham 29
Contingency Site 31
Proposed Change to Policy GNLP0581/2043: Land off Bawburgh Lane, north of New Road and east of A47 – incorporation of a Gypsy and Traveller site into the Costessey contingency site allocation 31
Unreasonable Alternatives 33
VCHAP Site 1 and Site 2, Middle Road, Denton 34
VCHAP Site 3, Land off London Road, Suton, Wymondham 35

Introduction

1. The Greater Norwich authorities (Broadland, Norwich and South Norfolk - the 'Partnership') submitted the Greater Norwich Local Plan (GNLP) for independent examination in July 2021.

2. In resolving to submit the GNLP for independent examination, the partnership councils agreed to "*proactively identify and bring forward sufficient Gypsy and Traveller sites to meet identified needs in accordance with the criteria-based policies of the current and emerging Development Plans*".

3. During the GNLP hearing sessions in February/March 2022 the inspectors indicated that they would require Gypsy and Traveller accommodation needs to be addressed through site allocations in the plan in accordance with the expectations set out in paragraph 68 of the NPPF.

4. This document responds by considering 10 favoured sites to provide permanent residential pitches for Gypsies and Travellers, 1 reasonable alternative site and an opportunity provided by proposed changes to the policy for an existing contingency site for housing development at Costessey.

5. Three sites have been submitted for consideration through the South Norfolk Village Clusters Plan which have been rejected as "unreasonable". As a result, no policies for these sites have been included in this document. However, maps for these sites are included and comments can be submitted. More information on the reasons for classifying the sites as unreasonable is in the Site Assessment Information document.

6. This consultation also provides a further opportunity for landowners to propose more sites for Gypsies and Travellers.

Context

7. The July 2021 submission of the GNLP to the Secretary of State stated that a further 64 pitches for Gypsies and Travellers will be required across Greater Norwich by the end of the plan period in 2038. Since then, the Partnership has kept its requirement under review and has continued working with RRR Consultancy ('RRR') to produce a new Gypsy and Traveller Accommodation Assessment ('GTAA') which was produced in June 2022.

8. The GTAA, with the most recent updates, shows there are 132 permanent authorised Gypsy and Traveller pitches in Greater Norwich. This consists of 98 existing authorised pitches, 24 potential sites with planning permission that will be built, 4 vacant pitches, and 6 transit pitches (although the latter are currently not occupied). Also, the 2011 Census shows there were 354 Gypsies and Travellers living in the area, representing 0.09% of the total population.

Background

9. The requirements for providing Gypsy and Traveller sites are set out in the National Planning Policy Framework (NPPF) (2021). Paragraph 68 of the NPPF sets out that local plans should include specific deliverable sites for years 1 to 5 of the plan period and developable sites for years 6-10 and where possible years 11-15.

10. The allied guidance to the NPPF specifically for Gypsies and Travellers is called the Planning Policy for Travellers Sites (PPTS) (2015). This makes the same point at paragraph 10 about local plans having '*specific deliverable sites sufficient to provide 5 years-worth of sites against their locally set targets… [and] specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15*'.

11. The PPTS also contains a definition of Gypsies and Travellers for planning purposes which focuses on people who continue to lead a nomadic lifestyle, as opposed to those households who are Gypsies and Travellers by ethnic background but who have permanently ceased to travel. However, this definition was the subject of a Court of Appeal decision in October 2022. The judgment concluded that the PPTS discriminates against Gypsies and Travellers who have ceased to travel due to disability or old age. No data is currently available to fully answer the question that the court case raises as it is not possible to determine how many Gypsies and Travellers living in bricks and mortar accommodation would want to move back into a caravan, including those who have ceased to travel through age or disability. Work for the GNLP is ongoing on this issue.

12. As required by national planning policy, the Partnership has evidence showing how many Gypsy and Traveller pitches the Greater Norwich area needs. This evidence was commission from RRR. The GTAA that RRR produced found a total need for 50 residential pitches to meet the total ethnic need. This figure has since been revised to 53 pitches as more recent evidence has shown that refurbishment work at the existing Swanton Road site in Norwich will deliver 3 fewer pitches than was originally expected.

13. Using the GTAA as the evidence base and applying the most recent information about sites under construction, the need for 53 pitches to meet ethnic needs to the timescales in Table 1 below has been identified:

Table 1 Pitch Numbers for the Ethnic Need Requirement

Ethnic Requirement	Time Period	Pitches
Specific Sites for Year 1 to 5	April 2022 to March 2027	31
Specific sites or broad locations for Years 6 to 10	April 2027 to March 2032	10
Specific Sites or broad locations for Years 11-15	April 2032 to March 2037	10
Specific Sites or broad locations for Year 16	April 2027 to March 2038	2
Total		**53**

Meeting the Need for Pitches

14. The Partnership recognises the benefits of a plan-led approach to providing suitable sites for Gypsies and Travellers. We are consulting on a choice of possible sites so that the best available sites can be identified.

15. The very recent appeal court decision suggests that providing sufficient pitches to ensure that the full ethnic need can be met should prevent any potential unlawful discrimination. Legal advice has confirmed that this is the case. It could also provide the strongest guarantee that full needs can be met.

16. This consultation includes 10 favoured sites along with a reasonable alternative site and the potential opportunity provided by the submitted housing contingency site as follows:

Table 2: Favoured Sites			
Reference	Address	Pitches	Pitches Delivered years 1 to 5
GNLP5004	Land off Buxton Road, Eastgate, Cawston	4	4
GNLP5005	Strayground Lane, Wymondham Recycling Centre	2	0
GNLP5009	Hockering Lane, Bawburgh	6	6
GNLP5014	A47 North Burlingham Junction	15	15
GNLP5019	Woodland Stable, Shortthorn Road, Stratton Strawless	4	4
GNLP5020	Romany Meadow, The Turnpike, Carleton Rode	6	6
GNLP5021	The Old Produce Shop, Holt Road, Horsford	6	6
GNLP5022	The Oaks, Foulsham	5	5
GNLP5023	Strayground Lane, Wymondham	10	10
GNLP5024	Upgate Street, Carleton Rode	4	4
Total		**62**	**60**

Table 3: Reasonable Alternative			
Reference	Address	Pitches	Pitches Delivered years 1 to 5
GNLP5013	Ketteringham Depot	10	0
Total		**10**	**0**

Table 4: Proposed change to Contingency Site			
Reference	Address	Pitches	Pitches Delivered years 1 to 5
GNLP5007R	Costessey Contingency Site	18	0
Total		**18**	**0**

17. The Partnership is confident that allocations to meet needs can be found from its list of favoured, reasonable and contingency sites.

18. This public consultation is an important part of the plan-making process as responses could provide feedback which alters the favoured sites currently identified.

19. In addition to the proposed allocations in this consultation, windfall sites on non-allocated locations could also come forward through planning applications. Existing development management policies which are currently used to assess such applications will be supplemented by policy 5 of the GNLP on adoption of the plan.

20. From analysing past trends, the Partnership estimates that 8 pitches are likely to be built over the current 5-year period between April 2022 and March 2027 on windfall sites.

21. In combination, the supply of pitches from consultation sites and windfall pitches that are anticipated would comfortably meet the identified need for pitches under the ethnic definition of need.

Consideration of Equalities Issues

22. The GNLP has been prepared with regard to the Public Sector Equality Duty, as defined by the Equality Act 2010 and an Equalities Impact Assessment (EqIA) accompanies the submission draft of the plan (document A10).

23. This Focused Consultation is a further positive step in meeting the Public Sector Equality Duty because Gypsies and Travellers are a key ethnic minority in the area and making specific site allocations will give added assurance that this group's housing needs are addressed.

Responding to this Consultation

24. There are consultation questions for the favoured, reasonable alternative and proposed change to the contingency site, as well as the opportunity to comment on the non-inclusion of unreasonable sites. These will allow respondents to express their support or objections and to give comments. The submitted opinions and comments will be published on the GNLP website and will be used in assessing which sites are progressed as allocations.

25. Ideally, consultation responses should be submitted online at www.gnlp.org.uk. However, written responses can also be made on a response form that can be requested by telephoning 01603 306603, emailing gnlp@norfolk.gov.uk or downloading from www.gnlp.org.uk.

26. The following supporting documents provide site by site analysis. They are intended to assist respondents in commenting on issues such as access to local facilities, landscape impact and ecological impact so that the best sites are chosen and they are built out in the best possible way:

    - Site Assessment Information (Appendix D for Cabinet Reports - Insert links when available)
    - Sustainability Appraisal of the Greater Norwich Local Plan Gypsy and Traveller Sites and Policies by Lepus Consulting (Appendix E for Cabinet Reports- Insert links when available)
    - Habitats Regulations Assessment of published Proposed Submission Greater Norwich Local Plan – Gypsy and Traveller Sites Addendum by The Landscape Partnership. (Appendix F for Cabinet Reports- Insert links when available)

27. A review of new and carried forward residential, employment and mixed-use allocations was undertaken which concludes that none of the allocations in the GNLP have the potential to accommodate pitches for Gypsies and Travellers. (Appendix F for Cabinet Reports- Insert links when available).

28. Please follow the links above to comment on these supporting documents.

Future Work in Allocating Gypsy and Traveller Sites

29. Following the close of the consultation on 13th March 2023 the GNLP team will process and analyse the responses received and finalise the preferred site allocations for consideration by the authorities in June 2023. The councils will then decide on submitting the Gypsy and Traveller sites into the GNLP process. If this is agreed, the finalised sites information and representations will be provided to the inspectors for their consideration. Hearing sessions and possible modifications to the plan will follow.

30. Main modifications to the GNLP are expected to be consulted on in Autumn 2023. This will provide a further opportunity to comment on selected sites and allow the Inspectors to produce their report on the plan before the end of 2023, with adoption anticipated early in 2024.

Favoured Sites

Policy GNLP5004 Land off Buxton Road, Eastgate, Cawston

31. This privately owned greenfield site is located on the Buxton Road in the hamlet of Eastgate to the south-east of Cawston.

32. Additional landscaping is required as part of the design and layout of the scheme to enhance screening and to maintain the residential amenity of adjoining properties. An archaeological assessment is also required prior to development due to the site being close to an area of Roman settlement.

Policy GNLP5004

Land off Buxton Road, Eastgate, Cawston (0.12 ha) is allocated for a permanent residential Gypsy and Travellers site. The site will accommodate approximately 4 residential Gypsy and Traveller pitches.

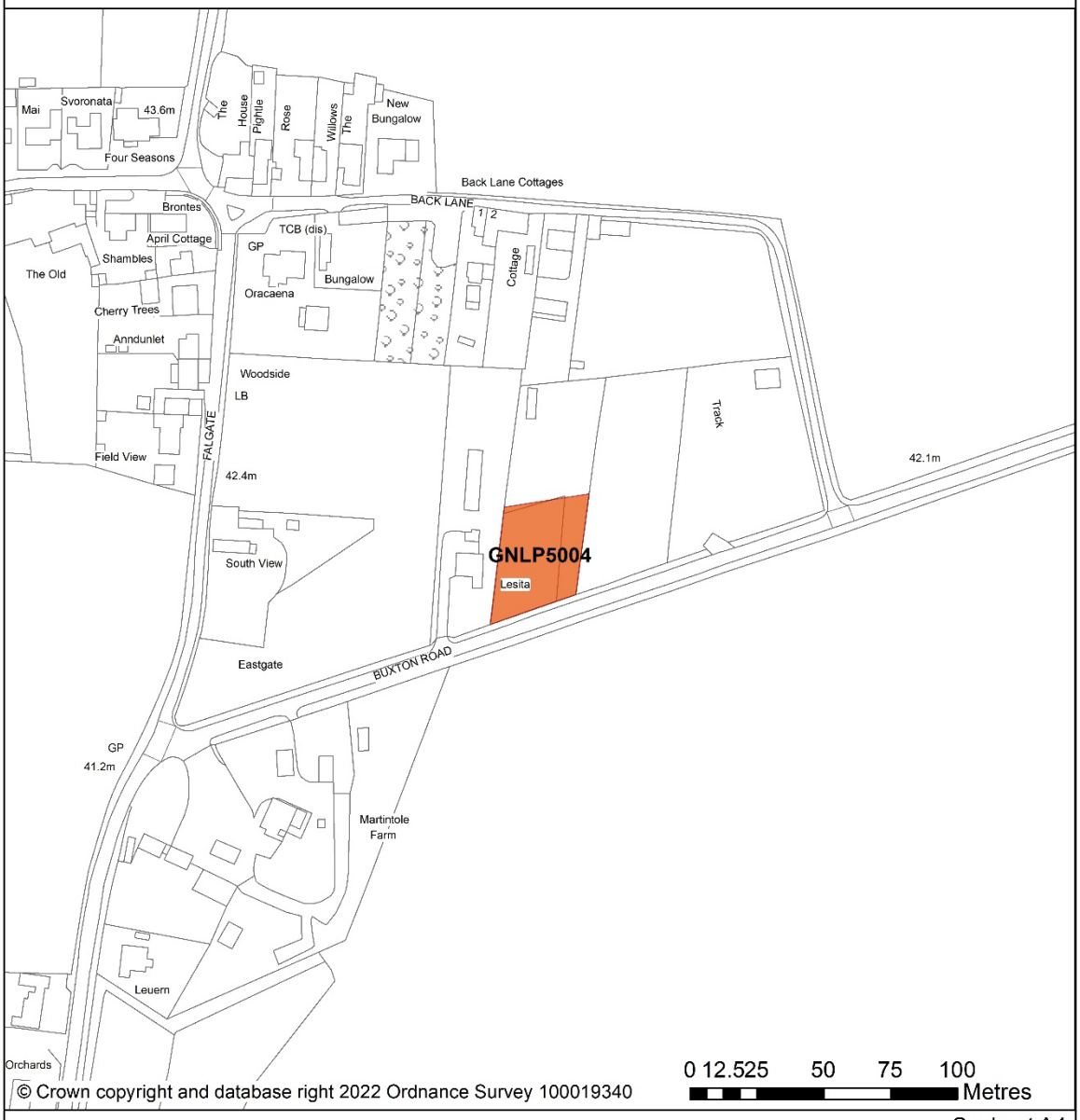
The development will address the following site-specific matters:

1. Access will be via Buxton Road. Any trees or hedgerow lost to form the access or visibility splay must be compensated for with new planting within the development.
2. Additional landscaping will be provided to enhance screening and to maintain the residential amenity of adjoining properties.
3. An archaeological assessment will be required prior to development.
4. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

CAWSTON

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

SITE REFERENCE: GNLP5004
LOCATION: Land off Buxton Road, Eastgate
DESCRIPTION: 4 residential pitches for Gypsies and Travellers
SITE AREA: 0.12 ha



Proposed Gypsy and Traveller Site

Scale at A4: 1:2,000

N

Date: 20/06/2022

Policy GNLP5005 Land at Strayground Lane Wymondham Recycling Centre, , Wymondham

33. This is a publicly owned brownfield site that is expected to become vacant due to the decision to relocate Wymondham Recycling Centre. Strayground Lane is a quiet country road that connects to the built edge of Wymondham to the north via Whartons Lane. The Bays River Meadow North County Wildlife Site is located to the north, and partly overlaps the site, and immediately to the west is an established paving business.

34. The redevelopment of this site will require local highways improvements, consideration of noise and dust from neighbouring activities, investigation of possible land contamination from previous uses, and conducting an ecological assessment prior to development due to the neighbouring County Wildlife Site.

Policy GNLP5005

Land at Strayground Lane Wymondham (0.07 ha), currently the Wymondham Recycling Centre, is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 2 residential Gypsy and Traveller pitches.

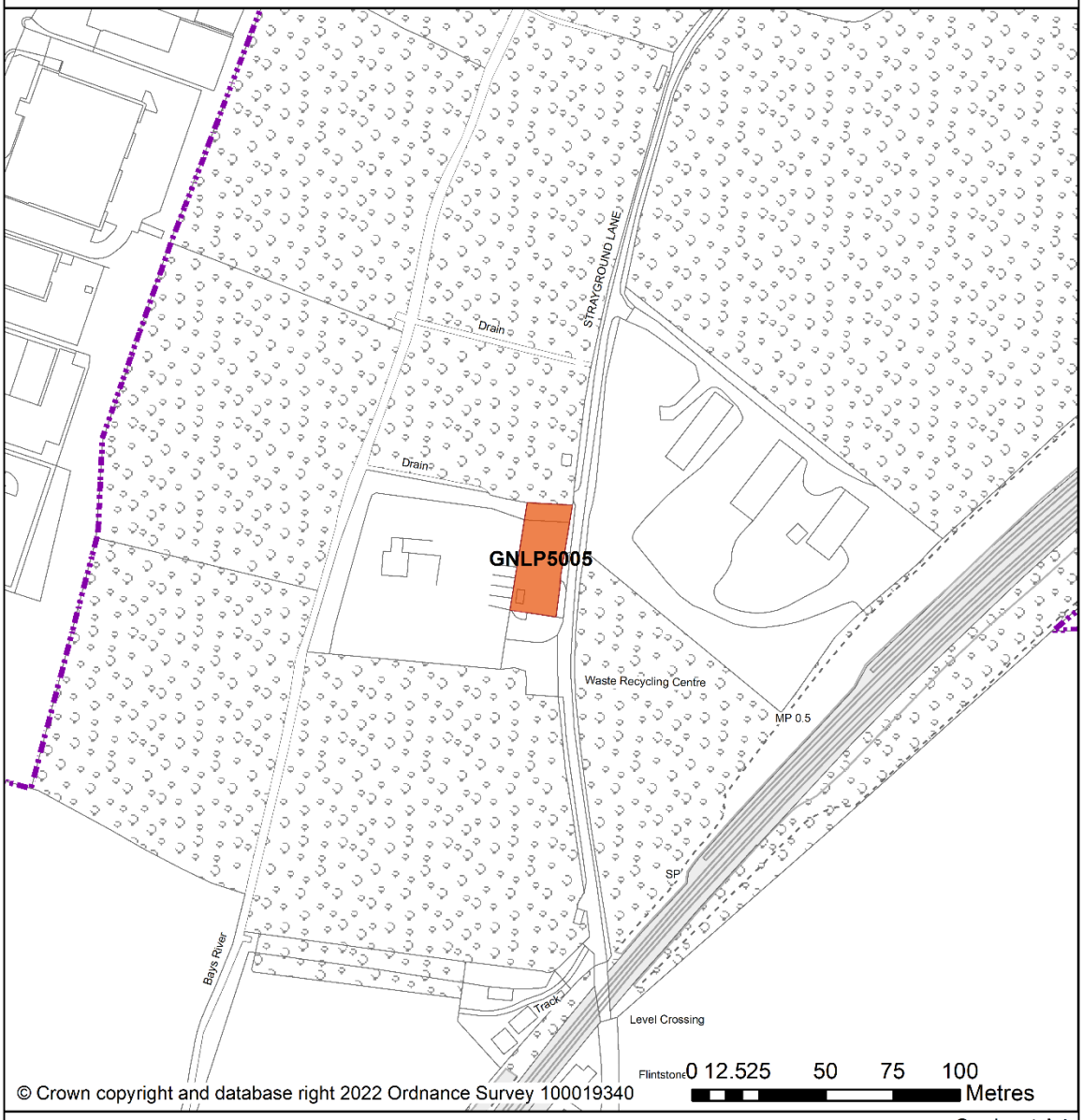
The development will address the following site-specific matters:

1. Access will be via Strayground Lane using the existing vehicular access for the recycling centre.
2. Improvements will be required to the passing bays along Strayground Lane and an adequate visibility is required at the junction of Whartons Lane with London Road (the B1172).
3. A contaminated land assessment is required, and any mitigation must be completed prior to development.
4. An ecological assessment must be carried out and any identified impacts on nearby sites mitigated.
5. Pollution mitigation measures are required as the site is within the catchment of groundwater source protection zone (III).
6. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

WYMONDHAM

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

SITE REFERENCE: GNLP5005
LOCATION: Wymondham Recycling Centre - off Strayground Lane
DESCRIPTION: 2 Residential pitches for Gypsies and Travellers
SITE AREA: 0.07 ha



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Proposed Gypsy and Traveller Site

Settlement Boundary

Scale at A4: 1:2,000

N

Date: 09/06/2022

Policy GNLP5009 Land off Hockering Lane, Bawburgh

35. The is a privately owned greenfield site to the east of Hockering Lane in Bawburgh. The site, which measures 0.59 ha, is part of an agricultural field that is bounded to the north, east and west by trees and hedges, whilst the remainder of the field is to the south.

36. An issue that will affect the design and layout of the site is a Cadent gas pipeline running north to south through the western part of the site. This will limit the number of pitches that can be positioned on the western part of the site and will require engagement with the Health & Safety Executive (HSE). Other considerations are that prior to development an ecological assessment will be required due to there being potential habitats for Great Crested Newts on-site, and an archaeological investigation is needed as some prehistoric features have been identified on adjacent land.

Policy GNLP5009

Land off Hockering Lane Bawburgh (0.59 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 6 residential Gypsy and Traveller pitches.

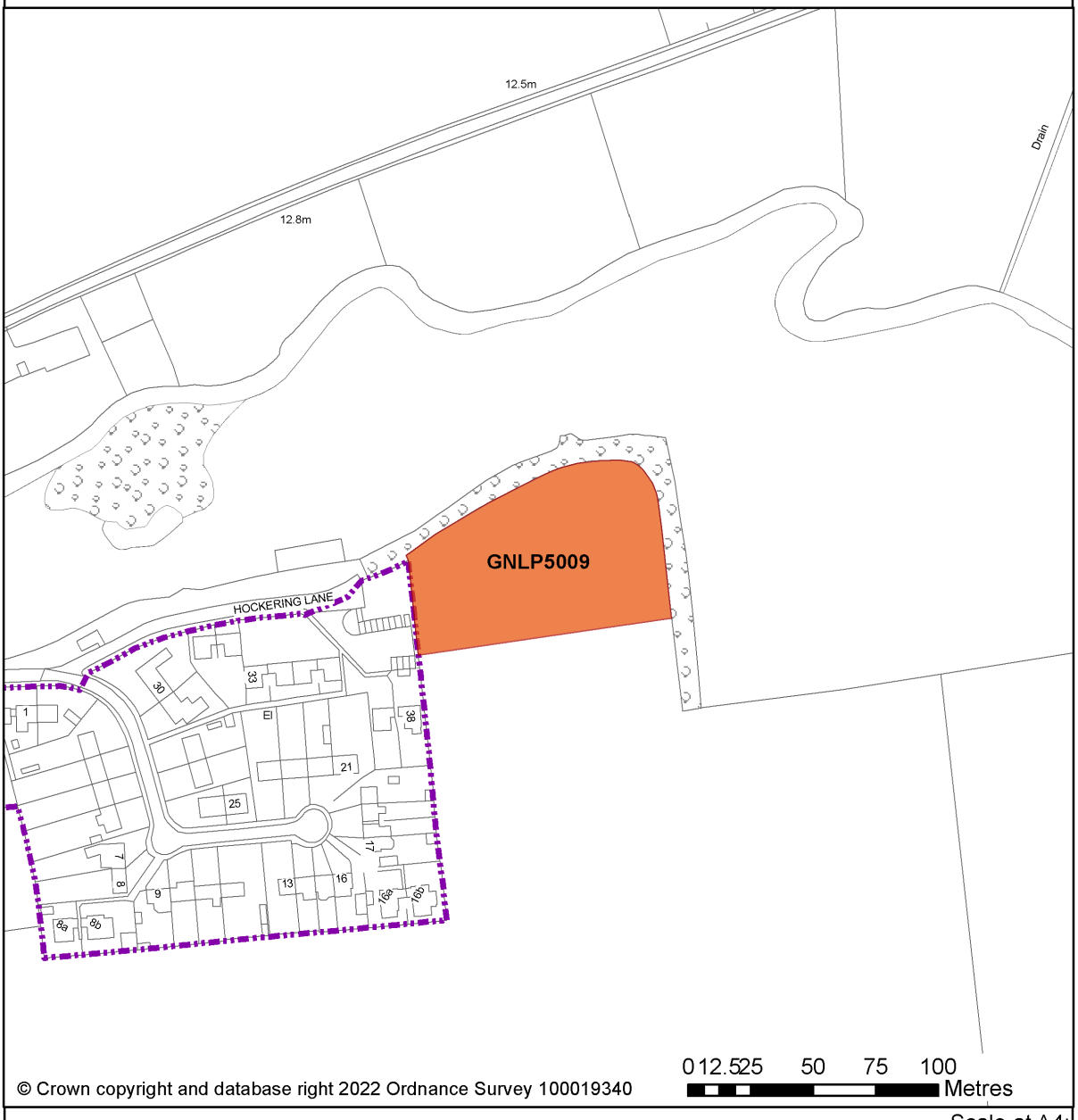
The development will address the following site-specific matters:

1. Access will be from Hockering Lane via a private road, therefore third-party rights of access will be required.
2. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
3. An archaeological assessment will be required prior to development.
4. Development will be designed to avoid impacts to and from the underground gas pipeline.
5. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

BAWBURGH

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

SITE REFERENCE: GNLP5009
LOCATION: Land at Hockering Lane, Bawburgh
DESCRIPTION: 6 residential pitches for Gypsies and Travellers
SITE AREA: 0.59 ha



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Key

Proposed Gypsy and Traveller Site

Settlement Boundary

Scale at A4: 1:2,131

N

Date: 24/03/2022

Policy GNLP5014 A47 North Burlingham Junction

37. This is a broad location of 2.48 ha providing for a site of up to 1 hectare for approximately 15 residential pitches for Gypsies and Travellers. The land in this broad location is in public ownership which will facilitate delivery of a site once the forthcoming A47 road improvements from Blofield to North Burlingham have been completed.

38. The proximity to the A47 and its associated road improvement scheme presents noise and air quality issues that will require mitigation through the design of the development. Landscaping and tree planning will also be required to preserve the character of the surrounding area and views of non-designated heritage assets.

Policy GNLP5014

Land off A47 North Burlingham Junction is allocated as a 2.48 ha broad location for a residential Gypsy and Traveller site within which a 1 ha site will accommodate approximately 15 residential Gypsy and Traveller pitches.

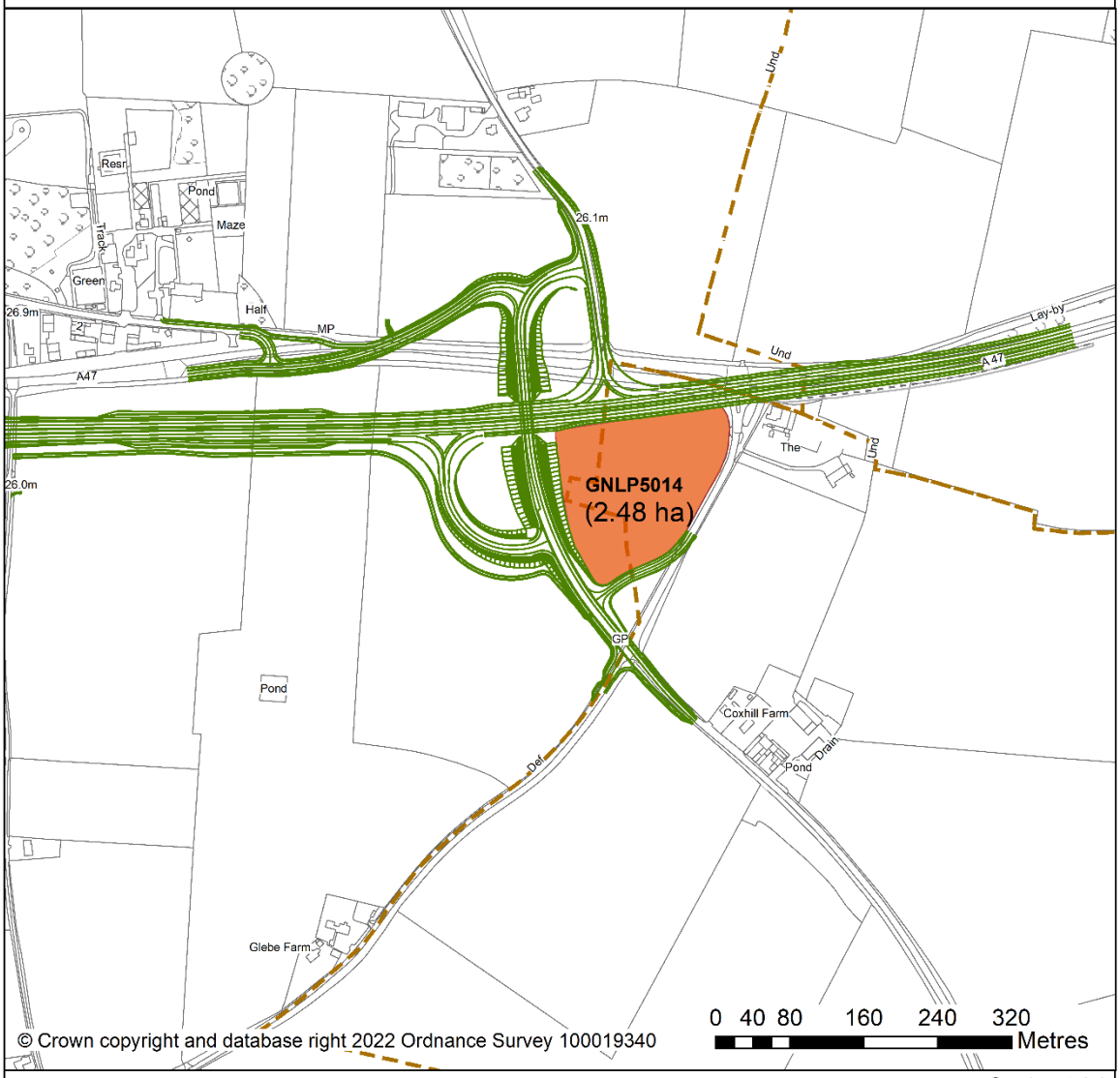
The development will address the following site-specific matters:

1. Access will be from the stopped-off road linking to the newly aligned B1140.
2. Noise and air quality investigations will be required, with provision of a layout and design that incorporates a landscape buffer to the nearby major roads and noise mitigation measures to protect residential amenity.
3. Landscaping and tree planting will be required to preserve the landscape character of the surrounding area and to protect views of non-designated heritage assets nearby.
4. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

A47 NORTH BURLINGHAM GYPSY AND TRAVELLER SITE BROAD LOCATION

Site Reference: GNLP5014
Location: Broad location south of A47 proposed route



Policy GNLP5019 Woodland Stable, Shortthorn Road, Stratton Strawless

39. This is a privately owned greenfield site which will extend a well-established privately owned Gypsy and Traveller site known as Woodland Stable located on Shortthorn Road in Stratton Strawless. The allocation of GNLP5019 will result in an expansion from the existing 9 pitches to 17 pitches in total.

40. Prior to development an ecological assessment is required due to the surrounding trees and the potential habitat for protected species.

41. The land shown as GNLP5019 already has planning permission for 4 pitches (20211657). This allocation therefore adds 4 pitches to the number already consented at Woodland Stable.

Policy GNLP5019

Woodland Stable, Shortthorn Road, Stratton Strawless (0.33 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 8 additional residential Gypsy and Traveller pitches.

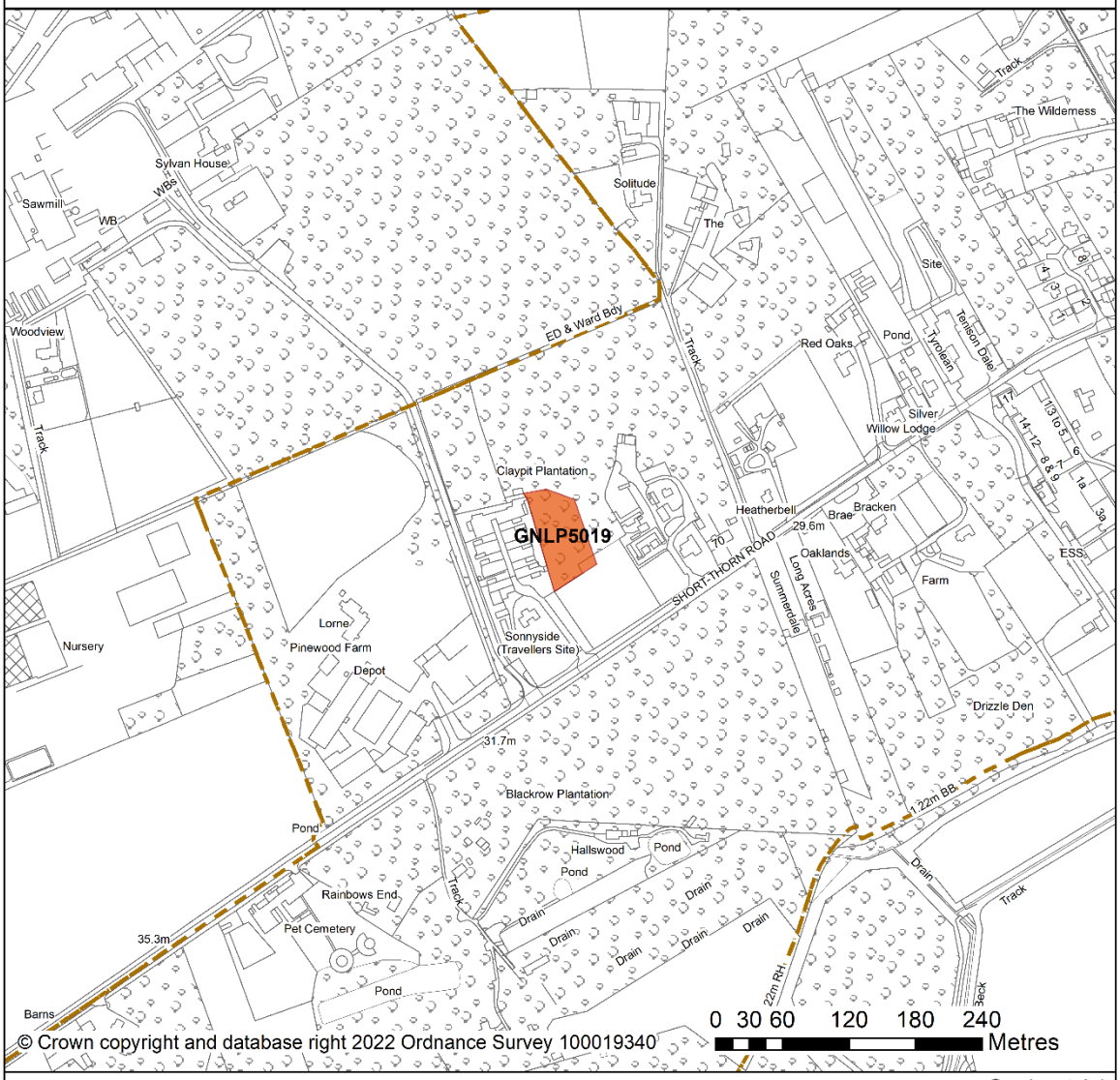
The development will address the following site-specific matters:

1. Access should be via the existing access off Shortthorn Road that serves the Woodland Stables site.
2. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
3. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

STRATTON STRAWLESS

Site Reference: GNLP5019
Location: Land at Woodland Stable, Shortthorn Road, Stratton Strawless
Description: 8 additional residential pitches for Gypsies and Travellers
Area: 0.33 ha



Gypsy and Traveller Site

Parish Boundary

Scale at A4: 1:5,000

N

Date: 01/11/2022

Policy GNLP5020 Romany Meadow, The Turnpike, Carleton Rode

42. This is a privately owned greenfield site which will extend a well-established Gypsy and Traveller site known as Romany Meadow on The Turnpike, Carleton Rode. The allocation of GNLP5020 will result in an expansion from the existing 6 pitches to 12 pitches in total.

43. Site specific issues will impact on the design of the development. A surface water flow path that crosses the southern part of the site is likely to limit where caravans and other structures can be located, and additional landscaping is required at the boundaries of the site to protect views of nearby listed buildings. An ecological assessment is also required due to the proximity of nearby mature trees and hedgerows.

Policy GNLP5020

Land off the B1113 (0.54 ha) at Romany Meadow, The Turnpike, Carleton Rode is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 6 additional residential Gypsy and Traveller pitches.

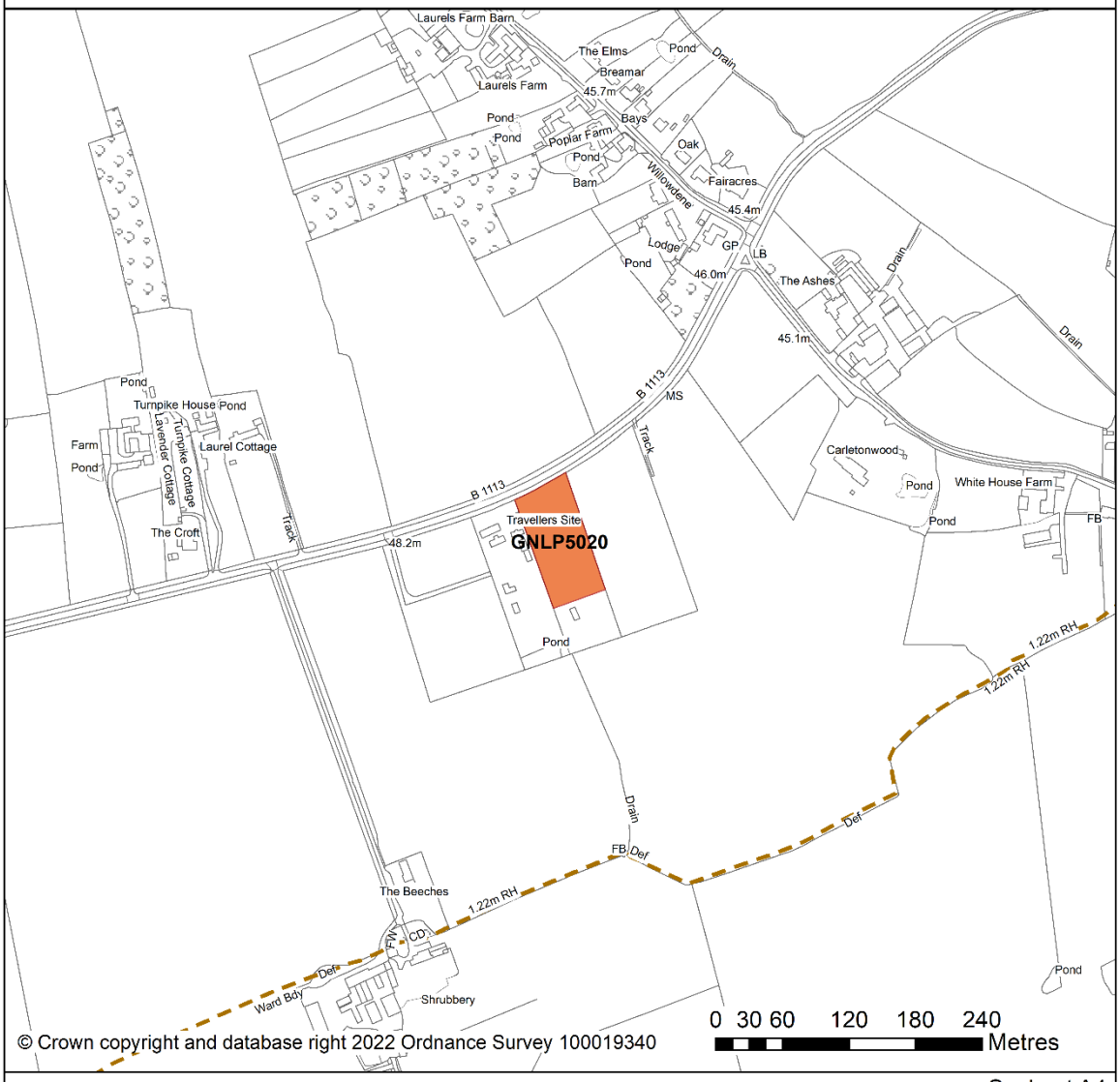
The development will address the following site-specific matters:

1. Access should be via the existing access off The Turnpike that serves the Romany Meadow site.
2. A surface water flood risk assessment must be carried out with caravans and other structures positioned away from areas at surface water flood risk.
3. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
4. Landscaping and tree planting will be required to preserve the landscape character of the surrounding area and to protect views of nearby listed buildings.
5. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

CARLETON RODE

Site Reference: GNLP5020
Location: Land at Romany Meadow, The Turnpike, Carleton Rode
Description: Approximately 6 residential pitches for Gypsies and Travellers
Area: 0.54 ha



Gypsy and Traveller Site

Parish Boundary

Scale at A4: 1:5,000

N

Date: 01/11/2022

Policy GNLP5021 Land of Holt Road, Horsford

44. This is a privately owned site which will extend an existing Gypsy and Traveller site known as The Old Produce Shop, Holt Road, Horsford. The allocation of GNLP5021 will result in its expansion from the existing single pitch to 7 pitches in total.

45. The design and layout of the site should consider measures to mitigate any noise, air quality and landscape issues that may arise from the site being located just to the north-west of the Broadland Northway (A1270) junction with the A140.

Policy GNLP5021

The Old Produce Shop, Holt Road, Horsford (0.9 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 6 additional residential Gypsy and Traveller pitches.

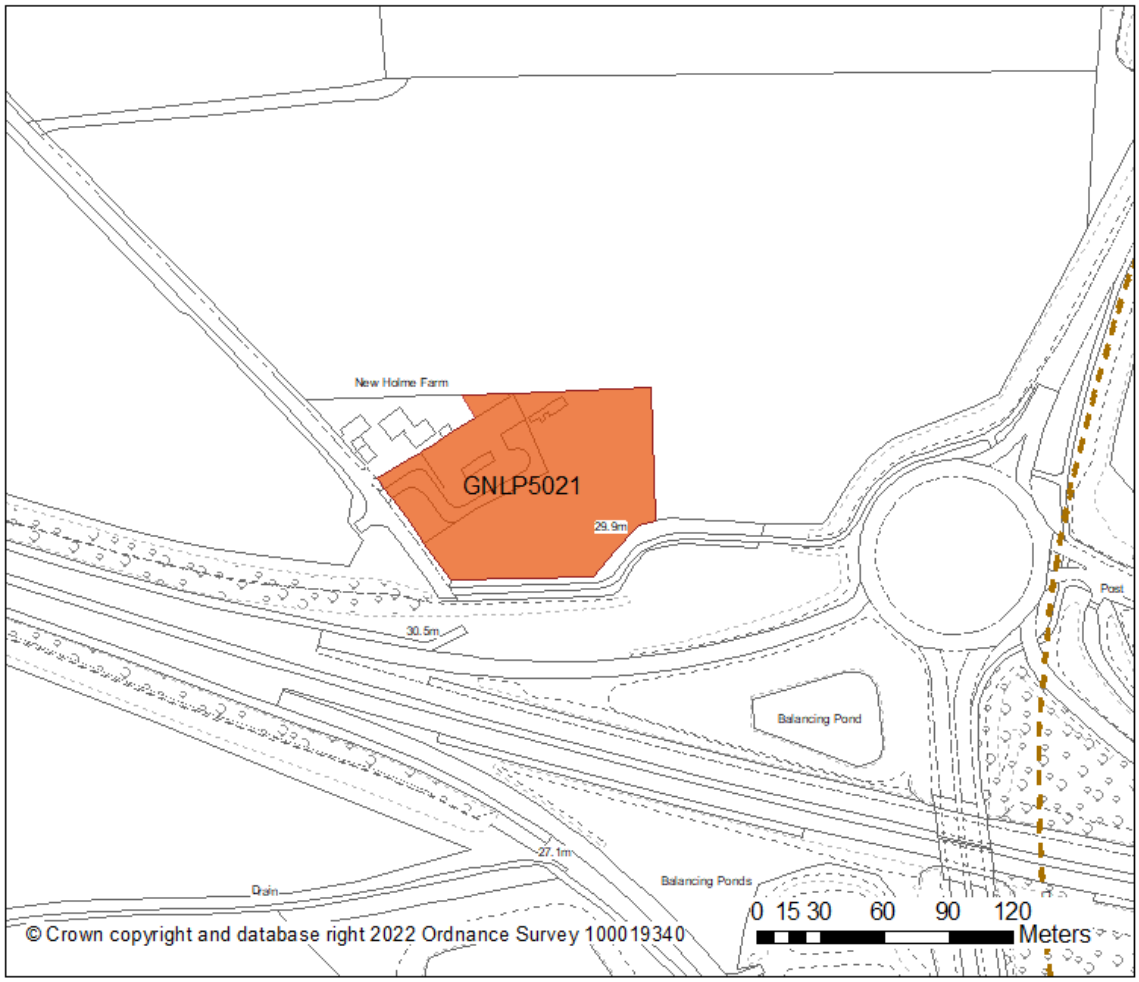
The development will address the following site-specific matters:

1. Access should be via the existing access off Holt Road that serves the Old Produce Shop site.
2. Noise and air quality investigations are required, with provision of a layout and design that incorporates a landscape buffer to the nearby major roads and noise mitigation measures to protect residential amenity.
3. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

LAND AT THE OLD PRODUCE, HOLT ROAD, HORSFORD

Site Reference:	GNLP5021
Location:	Land at the Old Produce Shop, Holt Road, Horsford
Description:	6 additional residential pitches for Gypsies and Travellers
Site Area:	0.9 ha



Scale at A4: 1:2,694

Legend

- Proposed Gypsy and Traveller Site
- Parish Boundary
- Settlement Boundary

N

Date: 25/11/2022

Policy GNLP5022 Land off Reepham Road, The Oaks, Foulsham

46. This site allocation would extend a well-established privately owned Gypsy and Traveller site by 5 further pitches. The site is located off the Reepham Road, approximately 2 km from the edge of the village of Foulsham which has a limited range of services and facilities including Foulsham Primary School.

47. Further development of the site will require investigations into highway safety, including vehicle speeds along Reepham Road, with widening of the visibility splay at the site entrance if required.

48. The Bacton to Kings Lynn gas pipeline crosses from east to west below the site at its mid-point. This will require further investigation, engagement with the Health & Safety Executive (HSE) and National Grid and consequent consideration of site design. A surface water flow path that crosses the southern portion of the site is also likely to limit where caravans and other structures can be located.

49. An ecological assessment is needed due to the presence of several County Wildlife Sites within 2.5 km.

50. The allocation of GNLP5022 will result in its expansion from the existing 2 pitches to 7 pitches in total.

Policy GNLP5022

The Oaks off Reepham Road, is allocated for a residential Gypsy and Traveller site (3.3 ha). The site will accommodate approximately 5 additional residential Gypsy and Traveller pitches.

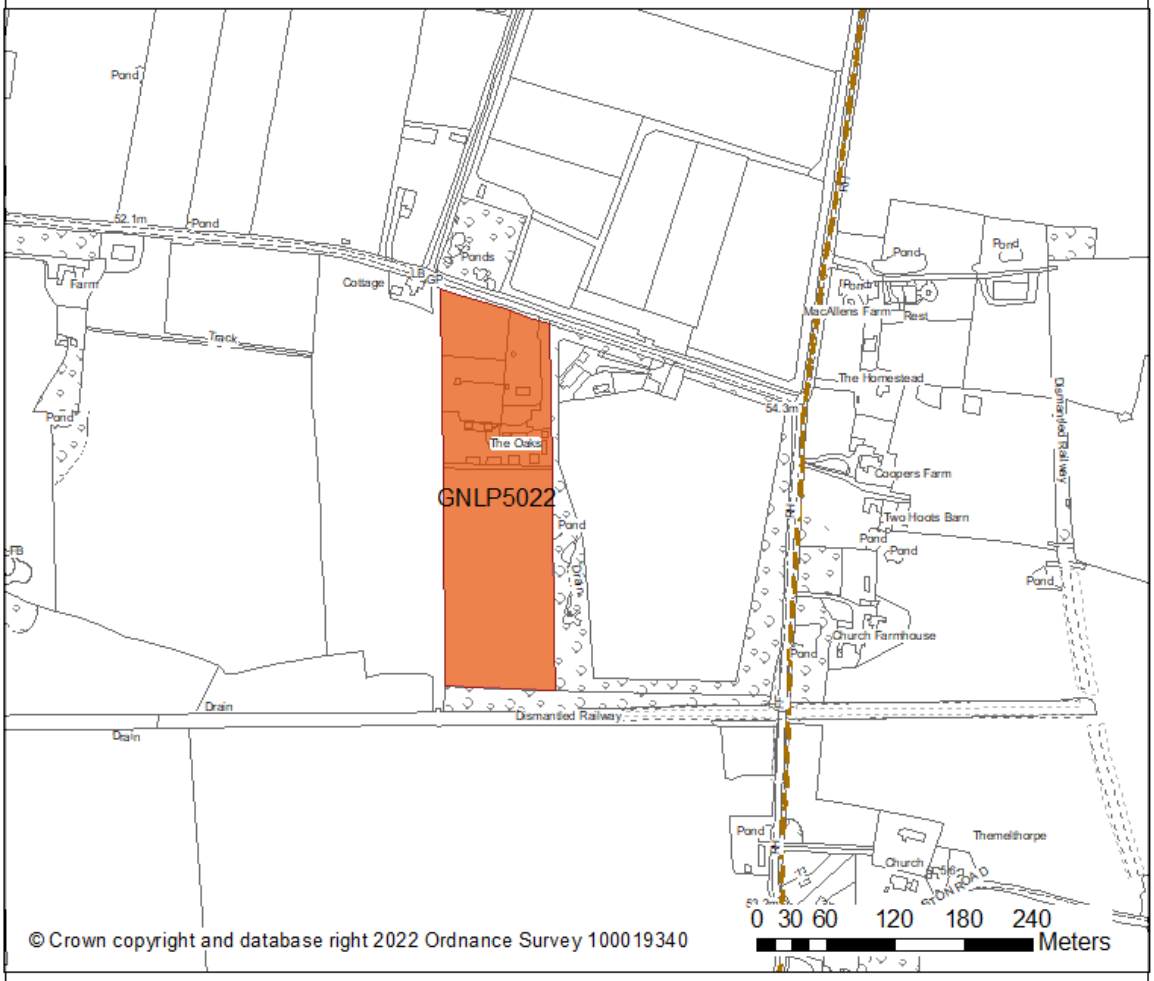
The development will address the following site-specific matters:

1. Access will be via the existing access on Reepham Road. A highway safety assessment is required and an appropriate visibility splay must be achieved.
2. A surface water flood risk assessment must be carried out with caravans and other structures positioned away from areas at surface water flood risk.
3. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
4. Landscaping and tree planting will be required to preserve the landscape character of the surrounding area and to protect views of nearby listed buildings.
5. Development will be designed to avoid impacts to and from the underground gas pipeline.
6. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

LAND AT THE OAKS, FOULSHAM

Site Reference:	GNLP5022
Location:	Land at the Oaks, Foulsham
Description:	5 additional residential pitches for Gypsies and Travellers
Site Area:	3.1 ha



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Scale at A4: 1:5,000

N

Legend

- Proposed Gypsy and Traveller Site
- Parish Boundary
- Settlement Boundary

Date: 28/11/2022

Policy GNLP5023 Land off Strayground Lane, Wymondham

51. This is a privately owned piece of land that has been put forward by the owner and is located towards the southern end of Strayground Lane, Wymondham. There is an established paving business to the north. There are mineral extraction activities on the land to the north-east and east. The Norwich to Cambridge railway line is to the south and the Bays River Meadow North County Wildlife Site is on the western boundary.

52. The development of this site will need to take account of a number of issues. These are highways improvements, consideration of noise and dust from neighbouring activities, investigation of possible land contamination from previous uses, consideration of neighbouring flood risk, an ecological assessment due to the neighbouring County Wildlife Site as well as trees and hedgerow on site, and pollution control measures for the groundwater source protection zone.

Policy GNLP5023

Land off Strayground Lane, Wymondham (1.1 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 10 residential Gypsy and Traveller pitches.

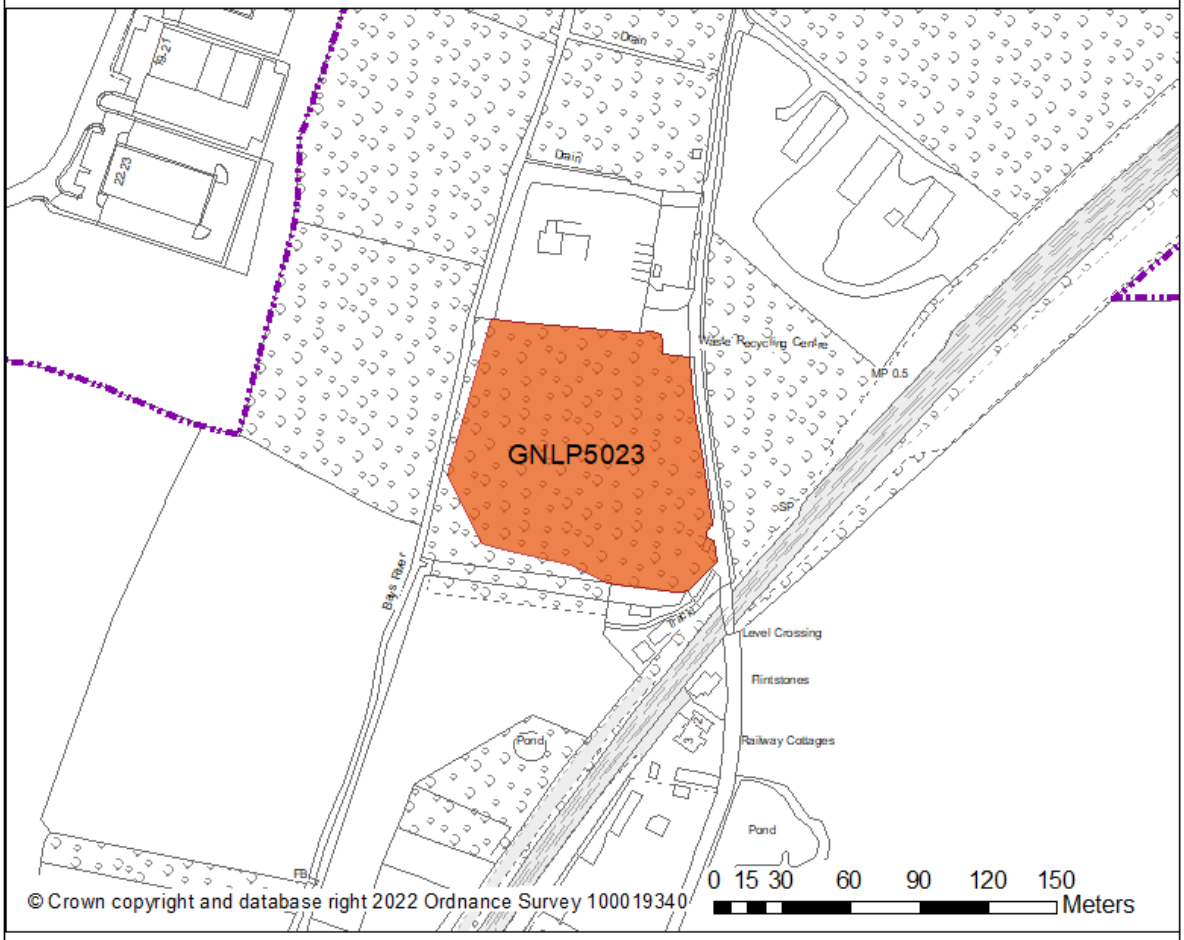
The development will address the following site-specific matters:

1. Access will be via Strayground Lane, using either the existing access point at the north-east corner of the site or a new access on the eastern boundary. If a new access is provided any loss of trees or hedgerows will be compensated for by new planting within the site.
2. Highway improvements will be required to the passing bays along Strayground Lane and an adequate visibility is required at the junction of Whartons Lane with London Road (the B1172).
3. As the land adjacent to the south-west is in Flood Zones 2 and 3, caravans and other structures shall also be positioned away from this area.
4. A contaminated land assessment is required and any mitigation must be completed prior to development.
5. Screening will be required to the neighbouring paving company.
6. An ecological assessment must be carried out and any identified impacts on nearby sites mitigated.
7. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
8. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

LAND AT STRAYGROUND LANE, WYMONDHAM

Site Reference:	GNLP5023
Location:	Land at Strayground Lane, Wymondham
Description:	Approximately 10 residential pitches for Gypsies and Travellers
Site Area:	1.1 ha



Legend

- Gypsy_and_Traveller_Broad_Location
- Parish Boundary
- Settlement Boundary

Scale at A4: 1:2,500

N

Date: 06/12/2022

Policy GNLP5024 Upgate Street, Carleton Rode

53. This is an existing privately owned Gypsy and Traveller site located on Upgate Street, Carleton Rode. The allocation of GNLP5024 will result in an expansion from the existing 2 pitches to 6 pitches in total.

54. Further development of the site will require investigation of highway safety, including of vehicle speeds along Upgate Street, with widening of the visibility splay at the site entrance as appropriate. An ecological assessment prior to development is required due to the presence of a veteran tree on the northern boundary of the site and because New Buckenham Common is approximately 250 metres to the south-west.

Policy GNLP5024

Upgate Street, Carleton Rode (0.62 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 4 additional residential Gypsy and Traveller pitches.

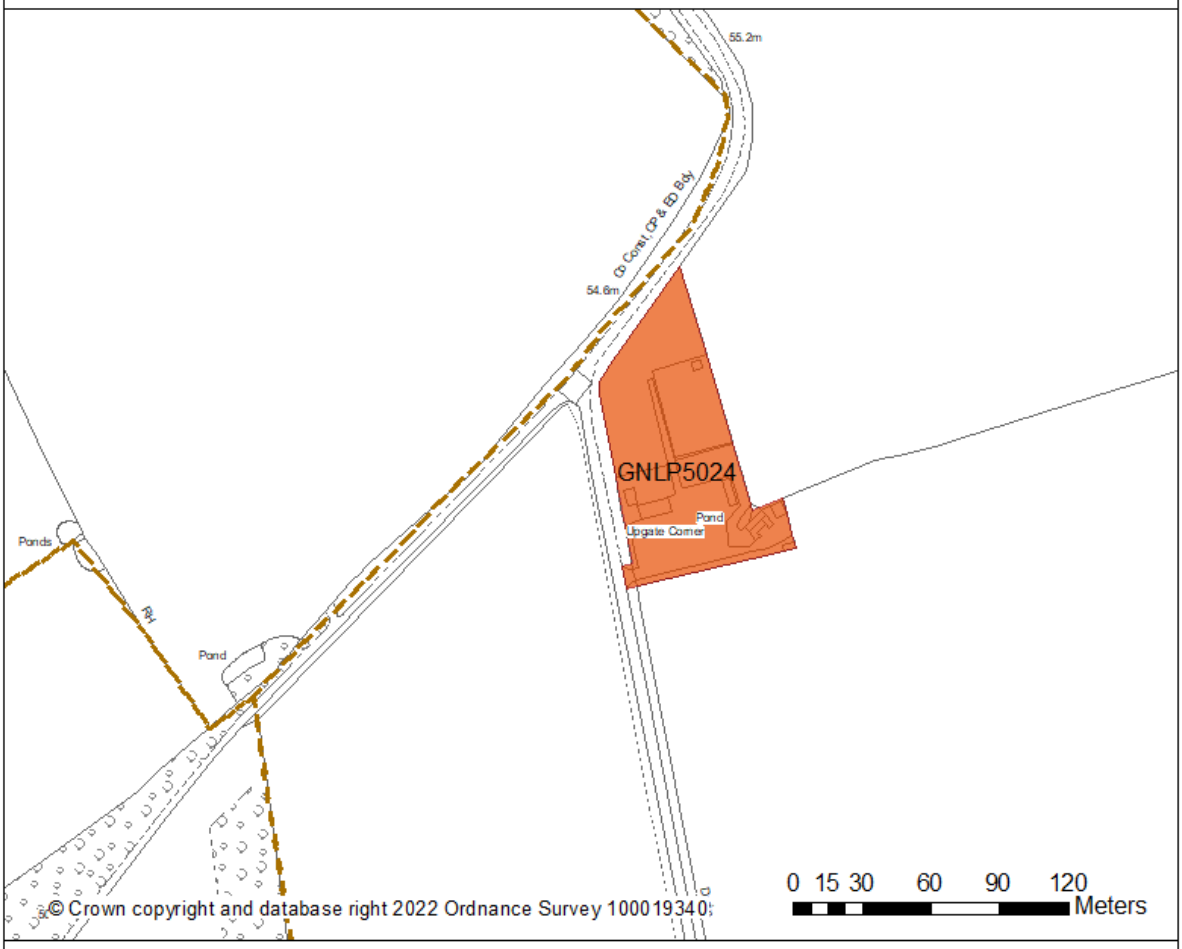
The development will address the following site-specific matters:

1. Access should be via the existing access off Upgate Street. A highway safety assessment is required and an appropriate visibility splay must be achieved.
2. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
3. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

LAND AT UPGATE STREET, CARLETON RODE

Site Reference:	GNLP5024
Location:	Land at Upgate Street, Carleton Rode
Description:	4 additional residential pitches for Gypsies and Travellers
Site Area:	0.62 ha



Legend

- Gypsy and Traveller Broad Location
- Parish Boundary
- Settlement Boundary

Scale at A4: 1:2,500

N

Date: 28/11/2022

Reasonable Alternative Site

Policy GNLP5013 Ketteringham Depot land west of Station Lane, Ketteringham

55. This site is on publicly owned land located west of Station Lane, Ketteringham. It is currently used as a depot which is expected to be relocated.

56. This site is separated from the nearest services and facilities which are in Hethersett., but nevertheless this site is considered a reasonable alternative for consultation. If GNLP5013 became allocated in the local plan a draft policy for the site is shown in the red box below.

57. A number of assessments will be required prior to development if the site is allocated. These are an assessment of possible land contamination from previous uses, an ecological survey for the potential for hibernating bats in the existing buildings and an investigation of potential noise and dust from neighbouring depot and waste processing businesses nearby.

Policy GNLP5013

Land west of Station Lane, Ketteringham, (0.86 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 10 residential Gypsy and Traveller pitches.

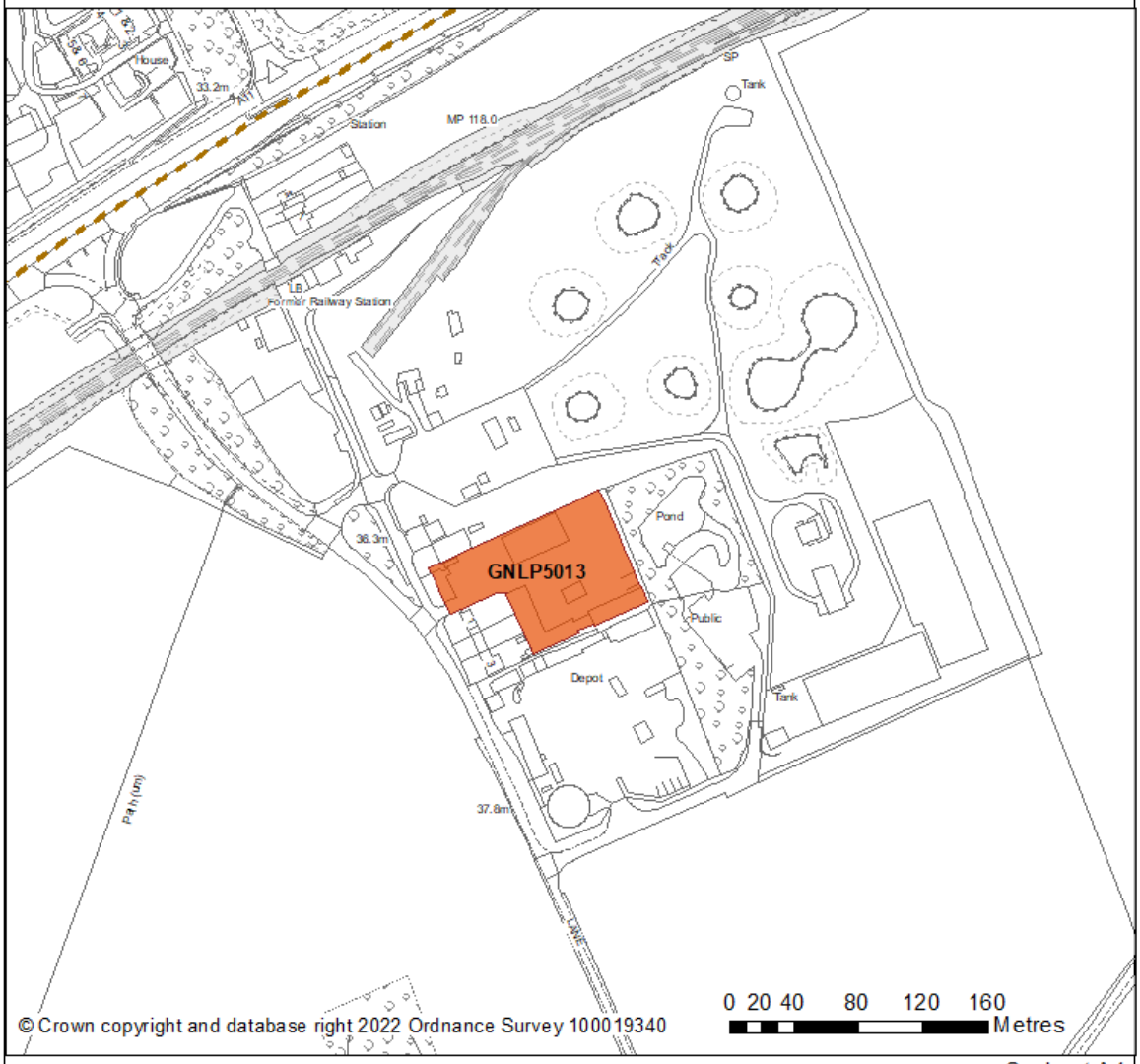
The development will address the following site-specific matters:

1. Access should be via the existing access that currently serves the depot.
2. Investigation is required of the potential for the conversion of existing buildings, particularly at the frontage, as part of the redevelopment.
3. Noise and air quality investigations are required, and the layout and design of the site should include boundary treatments that protect residential amenity.
4. A contaminated land assessment is required, and any mitigation must be completed prior to development.
5. An ecological survey is required due to the potential presence of protected species such as bats or barn owls in the existing buildings.
6. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

KETTERINGHAM

Site Reference: GNLP5013
Location: Land at Ketteringham Depot
Description: Reasonable Alternative for approximately 10 residential pitches for Gypsies and Travellers
Area: 0.7 ha



Gypsy and Traveller Site

Parish Boundary

Scale at A4: 1:3,500

N

Date: 30/11/2022

Contingency Site

Proposed Change to Policy GNLP0581/2043: Land off Bawburgh Lane, north of New Road and east of A47 – incorporation of a Gypsy and Traveller site into the Costessey contingency site allocation

58. A 62 ha site at Costessey is included in the submitted GNLP as a contingency housing site which can come forward in the event that the overall delivery of homes in the Greater Norwich Local Plan area falls significantly below annual targets. Should the need for the contingency site be triggered then the option would exist to provide a Gypsy and Traveller site as part of this urban extension.

59. The landowners for the contingency site are willing to incorporate a Gypsy and Traveller site for up to 18 pitches if the accommodation needs evidence at the time shows it is required. To allow for the master planning of the whole site, it is proposed to only identify a broad location for the potential Gypsy and Traveller site within the southern part of the contingency allocation. Not detailing a specific site at this time will ensure that a Gypsy and Traveller site could be properly integrated into any wider development. The southern part of the site gives the opportunity for early delivery of Gypsy and Traveller accommodation with vehicular access from New Road if the need for the contingency site is triggered.

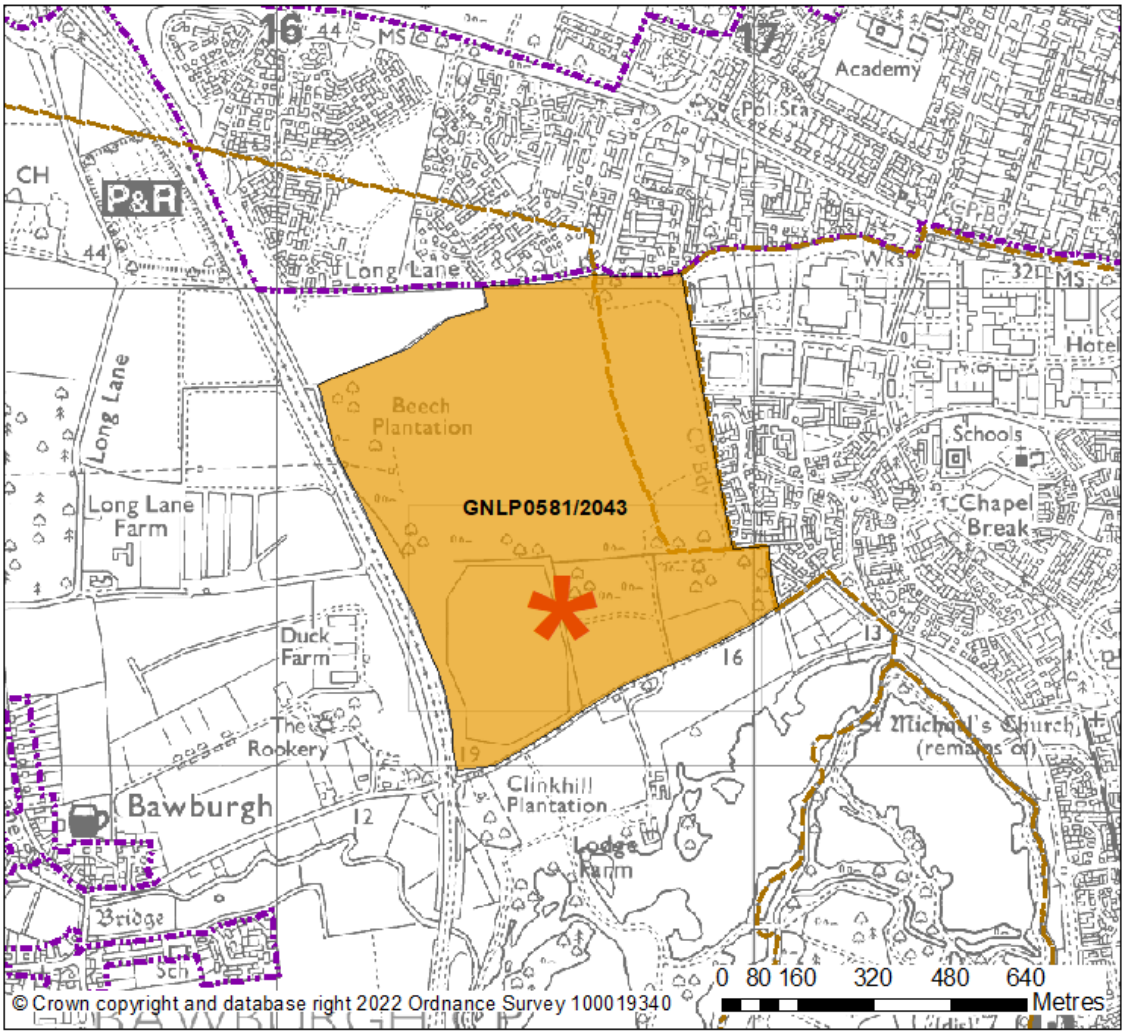
60. Delivering this option would require the amendment of the contingency site policy wording originally submitted to the inspectors for examination. The original policy text for the contingency site can be found at section 8 of the 'Part 2 – The Sites'. The proposal is to insert the following additional criterion to the list of specific matters which would need to be addressed:

"Subject to up-to-date evidence of need in the remainder of the plan period evidence at the time, provision of a 1 ha Gypsy and Traveller site providing approximately 18 pitches."

COSTESSEY

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

Site Reference: GNLP0581/2043
Location: Land off Bawburgh Lane, north of New Road and east of the A47
Description: Should the need for the contingency site be triggered then the option would exist to provide a Gypsy and Traveller site as part of this urban extension of approximately 800 homes. The southern part of the site is the broad location for the Gypsy and Traveller site with vehicular access from New Road.
Site Area: Approximately 1 ha will be located within entire 62 ha site



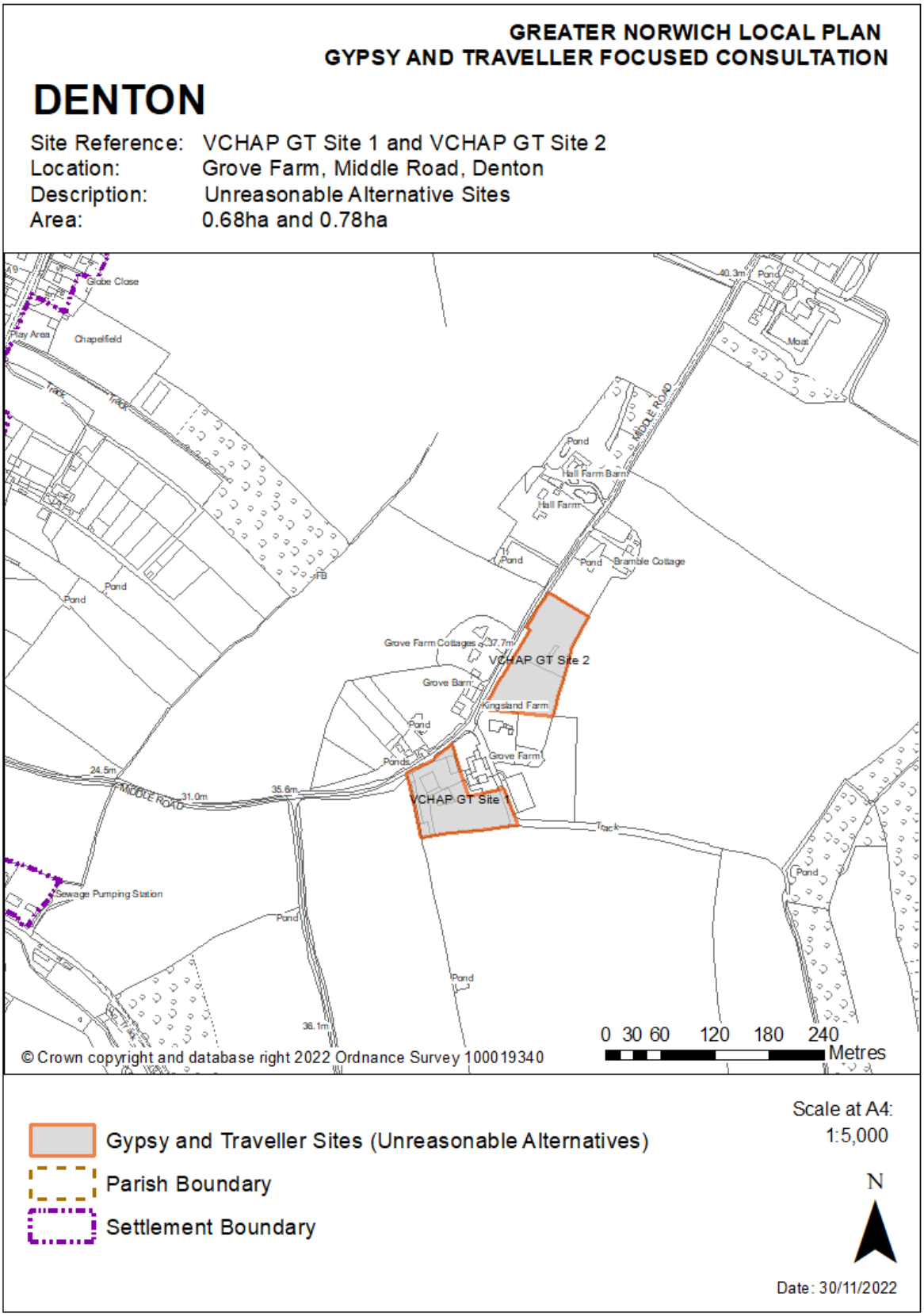
Contingency Site
Parish Boundary
Settlement Boundary
Broad Location of Gypsy and Traveller Site

Scale at A4: 1:12,000
N
Date: 30/11/2022

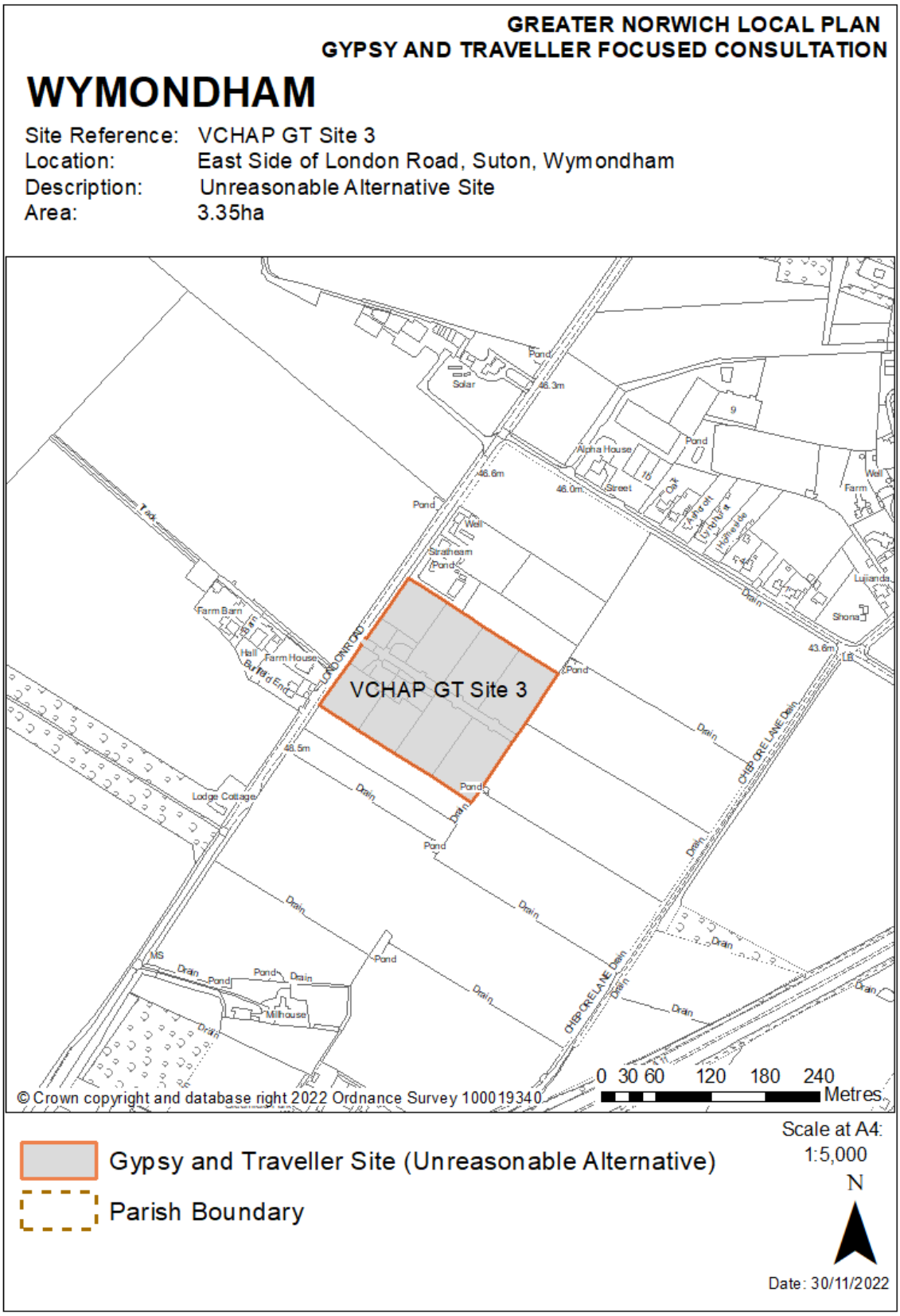
Unreasonable Alternatives

61. The following three sites are considered unreasonable alternatives but respondents to the consultation can comment upon them.

VCHAP Site 1 and Site 2, Middle Road, Denton



VCHAP Site 3, Land off London Road, Suton, Wymondham



Appendix D - Site Assessment Information

Contents

Introduction 3
Background 3
Methodology 3
Sustainability Appraisal and Habitats Regulation Assessment 4

Favoured Sites 6
Parish: Cawston 6
Site reference: GNLP5004 6
Parish: Wymondham 9
Site reference: GNLP5005 9
Parish: Bawburgh 12
Site reference: GNLP5009 12
Parish: Lingwood and Burlingham 15
Site references: GNLP5014 15
Parish: Stratton Strawless 18
Site reference: GNLP5019 18
Parish: Carleton Rode 21
Site reference: GNLP5020 21
Parish: Horsford 24
Site reference: GNLP5021 24
Parish: Foulsham 28
Site reference: GNLP5022 28
Parish: Wymondham 32
Site reference: GNLP5023 32
Parish: Carleton Rode 36
Site reference: GNLP5024 36

Reasonable Alternative 39
Parish: Ketteringham 39
Site reference: GNLP5013 39

Proposed change to Contingency Site 42
Parish: Costessey 42
Site reference: GNLP5081/2023 42

Unreasonable Sites 45
Parish: Denton 45
Site reference: VCHAP GT Site 1 45
Site reference: VCHAP GT Site 2 45
Parish: Wymondham 48
Site reference: VCHAP GT Site 3 48

Conclusion 489

Introduction

1. This document provides site assessment information for sites proposed for inclusion in the Greater Norwich Local Plan (GNLP) as Gypsy and Traveller sites.

2. It is a background document to the Site Policies document (Appendix C for the Cabinet Reports) which is the main consultation document for the focused consultation which takes place from January 30th to March 13th 2023.

3. This Site Assessment Information document provides an analysis of constraints and potential mitigation for sites proposed for allocation for Gypsy and Traveller accommodation in the GNLP. As such, it is both intended to assist wider consultation responses and its content can be commented on.

Background

4. The GNLP was submitted for independent examination in July 2021.

5. During the examination the two inspectors appointed on behalf of the Secretary of State made it clear that they expected to include specific site allocations for Gypsies and Travellers in the plan in accordance with national policy in paragraph 68 of the National Planning Policy Framework NPPF.

6. This assessment is limited in scope to sites that have been proposed to meet the accommodation needs of Gypsies and Travellers, considering 15 sites.

Methodology

7. Landowners have provided a “redline” outline plan for each of the proposed sites and a judgement has been made about how many pitches could be accommodated. As a guideline, to avoid the risk of pitches being too small, around 300 square metres is required per pitch. This accords with design guidance that suggests 320 square metres per pitch is needed to also provide space for an amenity block (with a kitchen, bathroom and living room) and touring caravan space for up to 2 caravans and 2 vehicles.[1]

8. The Norfolk-wide Housing and Economic Land Availability Assessment (HELAA) methodology has been the starting point for assessing all development proposals in the GNLP. This has been adapted to include criteria specific to the needs of Gypsy and Traveller communities including access, landscaping, acoustic screening and proximity to the main road network. The assessment of access to services takes account of the requirements for Gypsy and Traveller sites in more rural locations.

[1] https://www.leeds.gov.uk/docs/Gypsy and Traveller Site Design Guide.pdf designinggypsysites.pdf (publishing.service.gov.uk)

9. The proposed Gypsy and Traveller sites have been compared against the 14 suitability criteria in the HELAA methodology to assess if they are reasonable for development. The purpose of this is to screen out sites with no development potential; and, for the remaining sites, to identify issues that may need to be addressed to allow development to be progressed.

10. A 'red', 'amber' or 'green' rating is given for each site for each criterion, accompanied by a commentary and a conclusion. The ratings are informed by information from a broad range of professionals and are based on the following:

    - Green – no identified constraints;
    - Amber – constraints identified are either not significant enough to prevent development and/or could be mitigated;
    - Red – Significant constraints which can not be mitigated.

11. An 'Availability and Achievability' section identifies when sites could be delivered, either within the current 5-year time period to March 2027 or, due to site specific issues, to a longer timeframe to March 2032. This approach is in line with national policy.

12. Following assessment, the sites are classified into four categories below:

    - 10 sites are favoured options. Analysis shows that these sites have limited constraints which can be overcome and provide potential for allocation.
    - 1 site, at Ketteringham Depot, is a reasonable alternative which also has some potential for allocation, though with some constraints primarily related to accessibility and neighbouring uses.
    - 1 site at Costessey is a proposed policy change to the submitted contingency housing site. This is an option if a Gypsy and Traveller site is delivered as part of a larger scheme for approximately 800 homes if the evidence at the time supports the need for a Gypsy and Traveller site.
    - 3 sites have been rejected as unreasonable due to site constraints.

Sustainability Appraisal and Habitats Regulation Assessment

13. The Sustainability Appraisal of the Gypsy and Travellers sites (Appendix E for the Cabinet reports) is another background document for the consultation which provides additional assessment of the sites above, apart from the 3 which have been concluded to be unreasonable. It covers the sustainability performance of each favoured site, the reasonable alternative and the Costessey site. The appraisal feeds into the assessment of sites and provides recommendations for mitigation measures which have been incorporated into the Site Policies document as appropriate (Appendix C for the Cabinet reports).

14. The Habitats Regulation Assessment (HRA) (Appendix F for the Cabinet reports) assesses a wide range of potential impacts on nature conservation

sites of international importance, including any in-combination impacts with other development in the area.

15. It concludes that no allocations will be close enough to a European site to have any construction related impacts such as land-take or disturbance from construction activities. It also concludes that as there will be no allocations within 1.5 kilometres of a European site, there would also be no direct recreational impacts.

16. The HRA also concludes that the tariff payment of £185.93 per Gypsy and Traveller Pitch (and for other types of home) which has been set which will be sufficient to ascertain no adverse effect upon the integrity of any European site from the in-combination effects of residential developments across the plan area and beyond.

17. Subject to satisfactory policy modification of the GNLP with respect to Nutrient Neutrality, the HRA concludes that the proposed allocations for Gypsy and Traveller sites will have no adverse effect upon the integrity of any European site acting alone, in combination with other development in the GNLP or any other plan or project.

Favoured Sites

Parish: Cawston
Suitability Assessment

Site reference: GNLP5004	**Site area: 0.12 Ha**
LOCATION: Land off Buxton Road, Eastgate **District**: Broadland	**PROPOSED DEVELOPMENT:** A permanent residential Gypsy and Travellers site for 4 pitches

CONSTRAINTS ANALYSIS

Site Access	Amber
Accessibility to Services	Amber
Utilities Capacity	Green
Utilities Infrastructure	Green
Contamination and Ground Stability	Green
Flood Risk	Green
Market Attractiveness	Green

IMPACTS ANALYSIS

Significant Landscapes	Amber
Sensitive Townscapes	Green
Biodiversity and Geodiversity	Amber
Historic Environment	Amber
Open Space and GI	Green
Transport and Roads	Green
Compatibility with neighbouring uses	Amber

SITE SUITABILITY CONCLUSIONS

18. This greenfield site is off Buxton Road in the hamlet of Eastgate, south-east of Cawston. It is 0.12 ha in size and could accommodate 4 permanent residential Gypsy and Traveller pitches.

19. A suitable vehicular access from Buxton Road is likely to be achievable, subject to demonstrating an acceptable visibility splay, but this might require the removal of a hedgerow.

20. The site is slightly disconnected from the local services including a primary school in Cawston 1.7 kilometres away. However, as this is a relatively small development proposal it will not to lead to a significant increase in traffic on local roads or a significant increase in unsustainable travel patterns.

21. There are no known constraints relating to utilities capacity, contamination or ground stability. The site is within Flood Zone 1, so is at low risk of fluvial flooding and no surface water flooding risk has been identified.

22. Market attractiveness is evidenced by the landowner promoting the site.

23. GNLP5004 is on grade 2 agricultural land, so development would result in a minor loss of high-quality agricultural land. There would be a no loss of open space resulting from development and the site is not situated on a strategic green infrastructure corridor.

24. In relation to biodiversity, Cawston and Marsham Heaths SSSI is located approximately 1 kilometre from the site. There are four further SSSIs within a 5 kilometre radius (Booton Common, Buxton Heath, Alderford Common and Swannington Upgate Common) and the site is in a 'green' impact risk zone for Great Crested Newts. However, Natural England has not raised an objection to the site.

25. Cawston Conservation Area, which includes a number of Grade I and II listed buildings, is approximately 1.6 kilometres west of the site, so no adverse impact is expected on existing heritage assets. Since the site is close to an area of Roman settlement further archaeological investigation will be required which should identify any necessary mitigation.

26. There are residential properties to the north of the site on Back Lane, a field to the east, agricultural land on the south side of Buxton Road and a home to the west. Additional landscaping and hedges will be needed to enhance screening and to maintain the residential amenity of adjoining properties.

27. As with many locations in Greater Norwich, mitigation of the impacts on nutrient levels in river catchments will be required.

28. Overall, GNLP5004 is considered suitable as a favoured option for allocation, subject to any proposed development achieving an acceptable visibility splay and site investigations being undertaken.

Availability and Achievability Conclusions

29. GNLP5004 is in private ownership and the landowner is willing to make the site available for Gypsy and Traveller accommodation use. As a relatively unconstrained greenfield site, there is no reason why development could not come forward quickly. 3 to 5 years is considered ample time to market the land, gain planning permission, and to develop site GNLP5004.

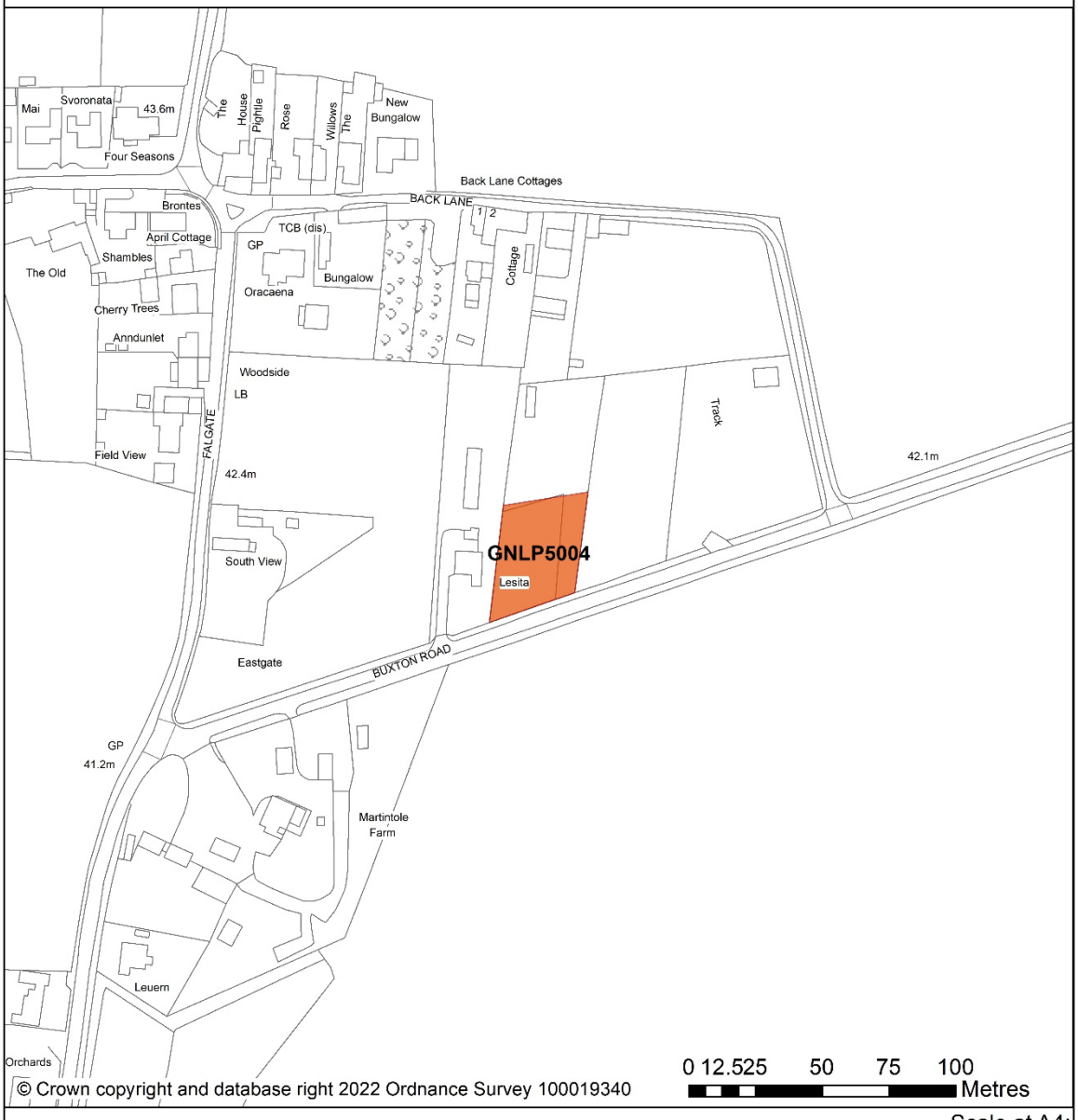
Overall Conclusions for Site

30. Subject to the caveats identified above, GNLP5004 is considered suitable as a favoured option for allocation. If allocated in the local plan, GNLP5004 would be deliverable within 5 years and could be completed by March 2027.

CAWSTON

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

SITE REFERENCE: GNLP5004
LOCATION: Land off Buxton Road, Eastgate
DESCRIPTION: 4 residential pitches for Gypsies and Travellers
SITE AREA: 0.12 ha



Parish: Wymondham
Suitability Assessment

Site reference: GNLP5005	**Site area: 0.07 Ha**
LOCATION: Land at Strayground Lane, Wymondham Recycling Centre **District**: South Norfolk	**PROPOSED DEVELOPMENT:** A permanent residential Gypsy and Travellers site for 2 pitches

CONSTRAINTS ANALYSIS

Site Access	Amber
Accessibility to Services	Amber
Utilities Capacity	Green
Utilities Infrastructure	Green
Contamination and Ground Stability	Amber
Flood Risk	Green
Market Attractiveness	Green

IMPACTS ANALYSIS

Significant Landscapes	Green
Sensitive Townscapes	Green
Biodiversity and Geodiversity	Amber
Historic Environment	Green
Open Space and GI	Green
Transport and Roads	Green
Compatibility with neighbouring uses	Amber

SITE SUITABILITY CONCLUSIONS

31. Site GNLP5005 measures 0.07 ha and is currently used as Wymondham Recycling Centre. The landowner intends to close this facility, so an opportunity exists to redevelop it for 2 residential Gypsy and Traveller pitches. However, the site is not likely to become available until 2027 at the earliest.

32. GNLP5005 has a vehicular access onto Strayground Lane which serves the existing recycling centre. Though the proposed use will generate less traffic than the existing recycling centre, Strayground Lane has no footpaths and the passing bays will require improvement. As Strayground Lane is a quiet road, pedestrians and cyclists would be able to use this route to access facilities in Wymondham. There is a local shop approximately 700 metres away and Browick Road Primary School is approximately 1 kilometre away.

33. The site is in flood zone 1, so is at low risk of river flooding, whilst a small area in the south of the site is at low risk of surface water flooding. The site is within the catchment of a groundwater Source Protection Zone (Zone III). As

such, pollution mitigation measures for water quality protection will be required, but this does not rule out development potential.

34. Good road and public transport connections in Wymondham are accessible from the site and its location suggests it will be attractive to the market.

35. GNLP5005 presents no substantive concerns in relation to heritage constraints as the nearest listed building (Grade II 'Ivy Green Villa') is 300 m away and is separated from the site by the industrial area on Chestnut Drive.

36. There will be a need for an ecological survey as the site is approximately 50m from undeveloped areas along the Bays River, which is a lowland fens priority habitat. GNLP5005 also partly intersects the Bays River Meadows North County Wildlife Site on its northern boundary.

37. Whilst not prohibiting possible development, there are other issues resulting from past and present neighbouring uses which may impact on the form of the development:
    - A paving company adjoins the site to its west and south. This will cause impacts from vehicle movements, noise and possibly dust, so screening may be required.
    - A neighbouring historic landfill site will require investigation for possible contamination.
    - There are various planning consents dating back to the 1990s for a gravel quarry, stockpiling aggregates, and landfilling of inert waste (references include C/92/7023 and C/94/7016) immediately to the north-east, east, and south of the site.

38. As with many locations in Greater Norwich, mitigation of the impacts on nutrient levels in river catchments will be required.

39. Overall, GNLP5005 is considered suitable as a favoured option for allocation subject to providing appropriate mitigation measures.

Availability and Achievability Conclusions

40. GNLP5005 is owned by Norfolk County Council and will become available for development once that existing recycling centre there closes. However, the site is not likely to become available until 2027 at the earliest. Further time would then be required to market the land, gain planning permission and to develop GNLP5005.

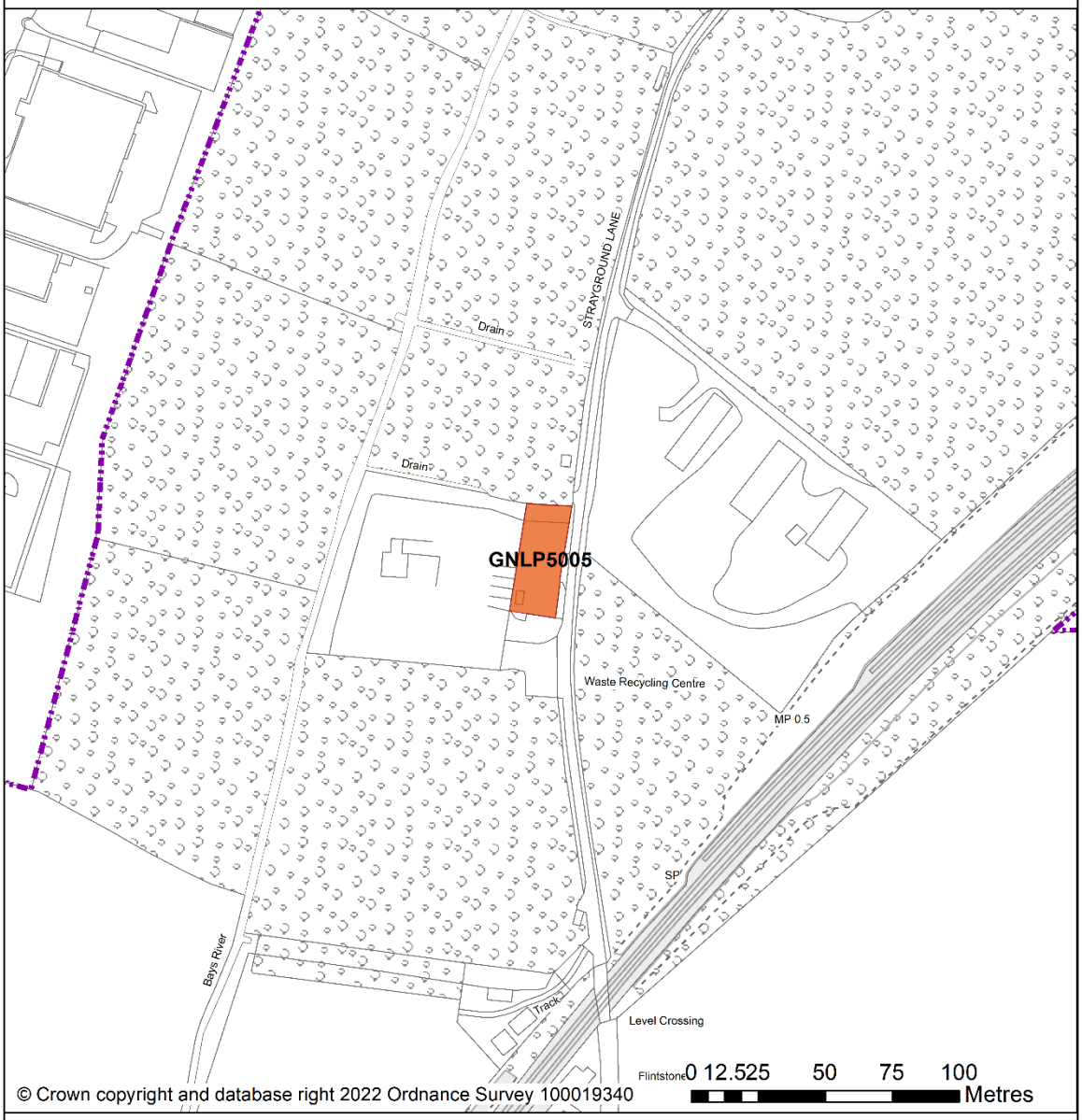
Overall Conclusions for Site

41. Subject to the caveats identified above, GNLP5005 is considered suitable as a favoured option for allocation. If allocated in the local plan, GNLP5005 would be developable within 6 to 10 years and should be completed by March 2032.

WYMONDHAM

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

SITE REFERENCE: GNLP5005
LOCATION: Wymondham Recycling Centre - off Strayground Lane
DESCRIPTION: 2 Residential pitches for Gypsies and Travellers
SITE AREA: 0.07 ha



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Proposed Gypsy and Traveller Site

Settlement Boundary

Scale at A4: 1:2,000

N

Date: 09/06/2022

Parish: Bawburgh
Suitability Assessment

Site reference: GNLP5009	**Site area: 0.59 ha**
LOCATION: Land off Hockering Lane, Bawburgh **District**: South Norfolk	**PROPOSED DEVELOPMENT:** A permanent residential Gypsy and Travellers site for 6 pitches

CONSTRAINTS ANALYSIS

Site Access	Amber
Accessibility to Services	Amber
Utilities Capacity	Green
Utilities Infrastructure	Amber
Contamination and Ground Stability	Green
Flood Risk	Green
Market Attractiveness	Green

IMPACTS ANALYSIS

Significant Landscapes	Amber
Sensitive Townscapes	Green
Biodiversity and Geodiversity	Green
Historic Environment	Amber
Open Space and GI	Green
Transport and Roads	Green
Compatibility with neighbouring Uses	Green

SITE SUITABILITY CONCLUSIONS

42. GNLP5009 is a proposal for 6 pitches on a greenfield site to the east of Hockering Lane in Bawburgh. The site, which measures 0.59 ha, is part of an agricultural field that is bounded to the north, east and west by trees and hedges, with the remainder of the field to the south.

43. Access to GNLP5009 would be via a private road, therefore third-party rights of access would be required. GNLP5009 is 200 metres from Bawburgh Primary School, but otherwise facilities are limited and residents would likely need to travel by private vehicle, for example the nearest shops are at Longwater Retail Park 3 kilometres away.

44. A gas pipeline runs north to south through the western part of the site. This is part of the Cadent Norfolk network and initial investigations suggest that an easement of 12.2 metres would be required. This is likely to dictate that the

majority of pitches would be positioned towards the central and eastern part of the site.

45. GNLP5009 is on the southern bank of the River Yare, meaning that there could be some adverse impact on the locally designated Yare/Tiffey River Valley landscape. Development would therefore be likely to require mitigation, such as additional tree planting on the site boundaries, to ensure visual impacts on the landscape are minimised.

46. There are no statutory designated environmental sites immediately affecting GNLP5009. The nearest is Bawburgh/Colney Gravel Pits County Wildlife Site and candidate County Geodiversity site which is 290 metres to the east of the site on the opposite side of the A47. The River Wensum SSSI and SAC is 3 kilometres to the north at its closest point to GNLP5009 and the Sweetbriar Road Meadows SSSI is 4.6 kilometres away to the east. However, an ecological assessment will be required due to there being potential habitats for Great Crested Newts on-site.

47. The site is 180 metres east of Bawburgh Conservation Area where the majority of the village's listed buildings are located, and it is possible that a Historic Impact Assessment (HIA) will be required due to the proximity of the scheduled grade II* garden buildings at the former Bawburgh Hall to the north-west of the site. Archaeological investigation may be required as some prehistoric features have been identified on land adjacent to GNLP5009.

48. There are limited concerns in relation to the remaining criteria. The site is in flood zone 1, so is at low risk of river flooding and is not at risk of surface water flooding. There are no issues over the loss of designated open space and the site is on relatively low-quality agricultural land (Grade 4). Whilst the site is less than 300 metres from the A47, noise impacts could be mitigated.

49. As with many locations in Greater Norwich, mitigation of the impacts on nutrient levels in river catchments will be required.

50. The site is in private ownership and the landowner is willing to make it available as a Gypsy and Traveller site. Although there are some constraints, most particularly the gas pipeline passing under the site and the possible adverse impact on the adjacent River Yare landscape, there is no reason why development with mitigation could not come forward quickly. 4 to 5 years is considered ample time to market the land, gain planning permission, and to develop the site.

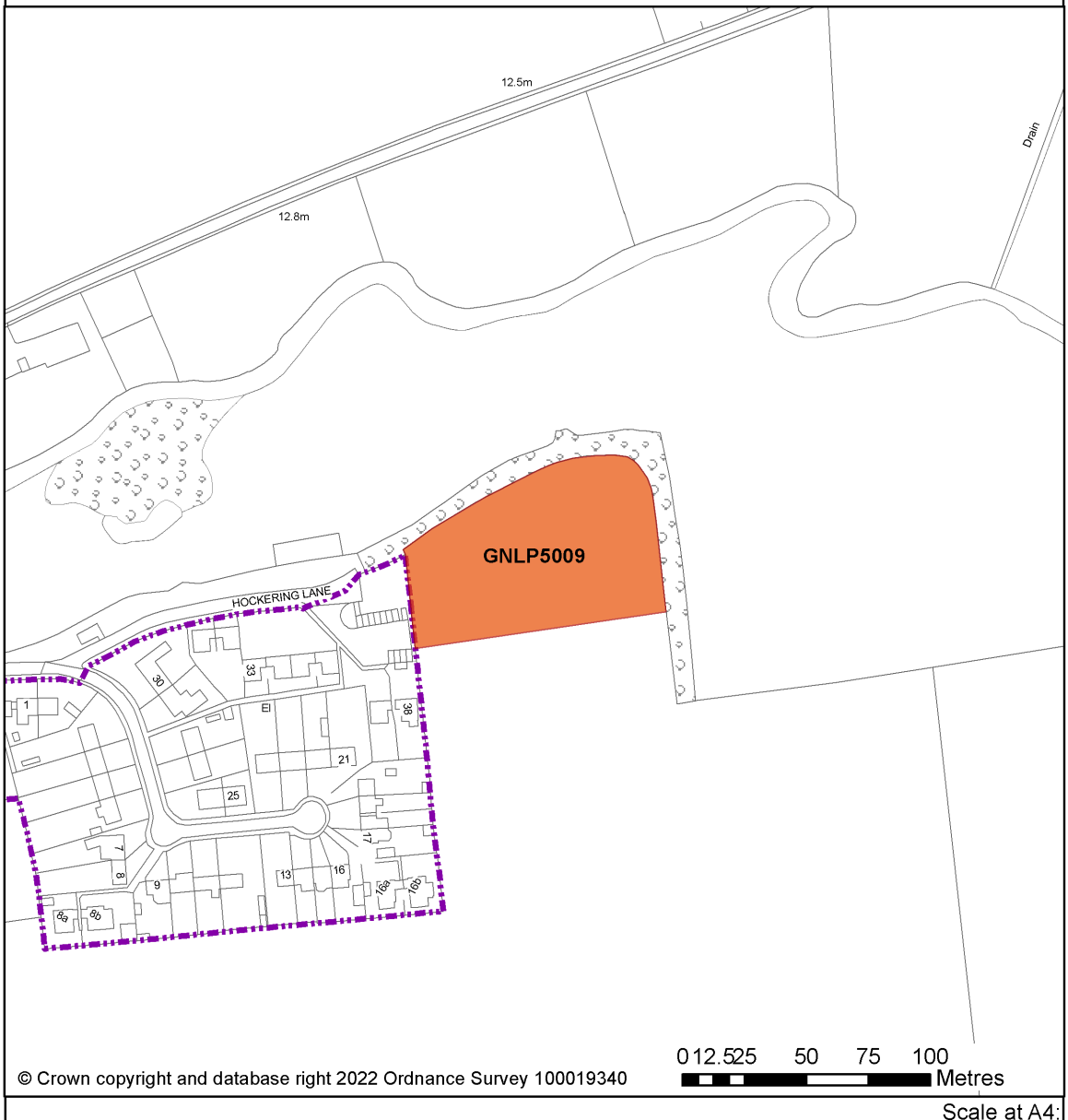
Overall Conclusions for the Site

51. Subject to the caveats identified above, GNLP5009 is considered suitable as a favoured option for allocation. If allocated in the local plan, GNLP5009 would be deliverable within 5 years and could be completed by March 2027.

BAWBURGH

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

SITE REFERENCE: GNLP5009
LOCATION: Land at Hockering Lane, Bawburgh
DESCRIPTION: 6 residential pitches for Gypsies and Travellers
SITE AREA: 0.59 ha



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Key

Proposed Gypsy and Traveller Site

Settlement Boundary

Scale at A4: 1:2,131

N

Date: 24/03/2022

Parish: Lingwood and Burlingham Suitability Assessment

Site references: GNLP5014	**Site area: 1 ha (within a 2.48 ha area)**
LOCATION: A47 North Burlingham Junction **District**: Broadland	**PROPOSED DEVELOPMENT:** A permanent residential Gypsy and Travellers site for 15 pitches within a broad site location.

CONSTRAINTS ANALYSIS

Site Access	Green
Accessibility to Services	Amber
Utilities Capacity	Green
Utilities Infrastructure	Green
Contamination and Ground Stability	Green
Flood Risk	Green
Market Attractiveness	Green

IMPACTS ANALYSIS

Significant Landscapes	Amber
Sensitive Townscapes	Green
Biodiversity and Geodiversity	Green
Historic Environment	Amber
Open Space and GI	Green
Transport and Roads	Green
Compatibility with neighbouring uses	Green

SITE SUITABILITY CONCLUSIONS

52. A broad site location has been identified to provide a site of up to 1 hectare for 15 residential pitches for Gypsies and Travellers. The 1 hectare site is located within a larger area of greenfield land (2.48 ha) which is owned by Norfolk County Council and is currently in agricultural use. The potential site and the wider area will gain excellent access to the main road network due to the forthcoming A47 dualling from Blofield to North Burlingham.

53. Vehicular access to the proposed site is very likely to be achievable given the wider road improvements around this site which will create of a cul-de-sac on the current alignment of the B1140. This will allow easy access to the site.

54. The site is located between Blofield to the west, Acle to the east and Lingwood to the south. It is very likely to be an attractive location for the gypsy

and traveller community given the access to main roads that will be provided when the upgrades to the A47 have been completed. Whilst the site is in close proximity to a school bus route, there is somewhat limited access to local services in Lingwood as there is currently no footpath on the local road.

55. There are no known issues from contamination or ground stability. The site is in flood zone 1, so is at low risk of river flooding and there is not at risk of surface water flooding.

56. The site is grade 1 agricultural land, so development would result in a minor loss of high-quality agricultural land. However, the road scheme will greatly reduce the agricultural utility of this land.

57. There are county wildlife sites at Church and Belt Plantations which are located to the north-west of the proposed site and to the north of the A47. The impact of the proposed development on these designated habitats would be negligible.

58. St Peter's Church, a grade II listed building, is located in North Burlingham to the north-west of the site. Given that it is on the opposite side of the A47, it will not be impacted. As the landscape is relatively flat and open and there are nearby non-designated heritage assets, screening for any development would need to be provided. Depending on the exact location of development, such screening could also provide noise mitigation from the upgraded A47.

59. Development of this site would not result in the loss of formal open space. As the site will be adjacent to the local road network which will be in place after the dualling of the A47 at the North Burlingham junction, it is not expected to affect the functioning of local roads.

60. Overall, the site is suitable as a favoured option for allocation subject to a providing a suitable vehicular access, screening and possibly noise mitigation measures.

Availability and Achievability Conclusions

61. Norfolk County Council Farms is the owner of the site and land required for a Gypsy and Traveller site is available for development. Investigations are underway into how best to bring a Gypsy and Traveller site forward.

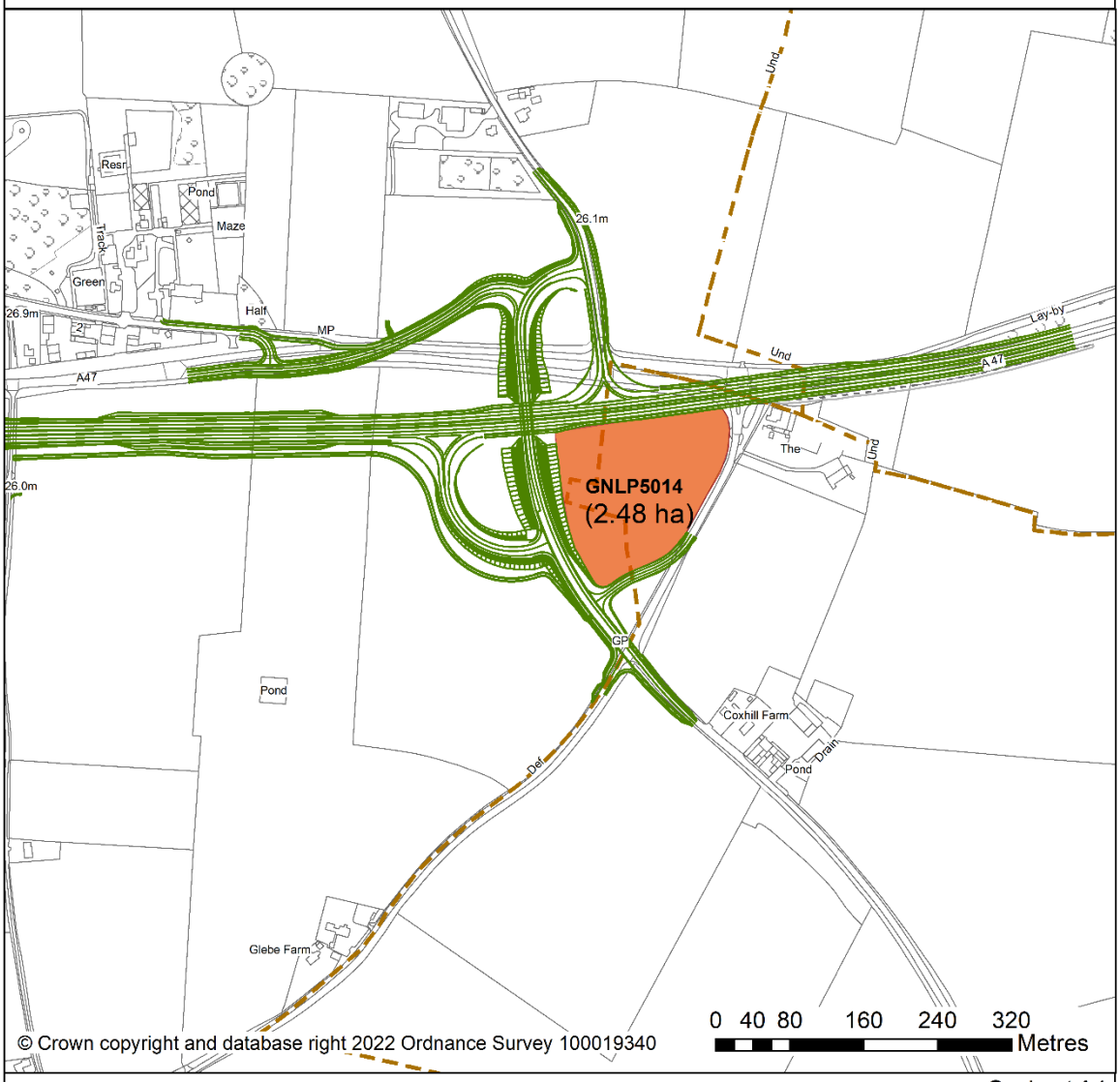
Overall Conclusions for Site

62. Subject to the caveats identified above, site GNLP5014 is considered suitable as a favoured option for allocation. Timescales are dependent on the trunk road scheme, but it is anticipated that GNLP5014 would be deliverable within 5 years and could be completed by March 2027.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

A47 NORTH BURLINGHAM GYPSY AND TRAVELLER SITE BROAD LOCATION

Site Reference: GNLP5014
Location: Broad location south of A47 proposed route



A47 Proposed Route

Parish Boundary

Gypsy and Traveller Broad Location

Scale at A4: 1:6,000

N

Date: 16/11/2022

Parish: Stratton Strawless Suitability Assessment

Site reference: GNLP5019	**Site area: 0.33 ha**
LOCATION: Land north of Shortthorn Road, Stratton Strawless **District**: Broadland	**PROPOSED DEVELOPMENT:** To provide 8 pitches, extending the existing 9 pitches to 17 pitches in total. This would provide 4 more pitches than are currently permitted.

CONSTRAINTS ANALYSIS

Site Access	Green
Accessibility to Services	Amber
Utilities Capacity	Green
Utilities Infrastructure	Green
Contamination and Ground Stability	Green
Flood Risk	Green
Market Attractiveness	Green

IMPACTS ANALYSIS

Significant Landscapes	Green
Sensitive Townscapes	Green
Biodiversity and Geodiversity	Amber
Historic Environment	Green
Open Space and GI	Green
Transport and Roads	Green
Compatibility with neighbouring Uses	Green

SITE SUITABILITY CONCLUSIONS

63. GNLP5019 is a proposal to extend a well-established privately owned Gypsy and Traveller site which is known as Woodland Stable and is located on Shortthorn Road in Stratton Strawless. The planning history on this site includes a decision in 2009 to grant planning permission for '8 Traveller Residential Pitches' (reference 20091534 2016), and a further decision in 2016 to permit a community building and an additional ninth pitch (reference 20161500). In February 2022 planning permission was granted for a further 4 pitches (reference 20211657).

64. The GNLP5019 proposal is to expand the permitted extension by a further 4 pitches by providing 8 pitches on the area of land earmarked on the site plan for planning application 20211657. If this proposal goes ahead the entire

Woodland Stable site would grow from the existing 9 pitches to 17 pitches in total.

65. The distance to services and facilities is a constraint. Whilst there are various businesses along Shortthorn Road, the majority of facilities such as schools and shops are only accessible by a short car journey to the neighbouring villages of Hainford, Horsford, or Hevingham. Nevertheless, this is a well-established site, it is in a location with good access to the A140 Cromer Road to the east and would be an extension to an existing Gypsy and Traveller site.

66. In other respects, GNLP5019 performs well against the assessment criteria and confidence can be drawn for the success of the existing site. The market attractiveness of the site is reflected in the demand from the Gypsy and Traveller community to extend it. There are no constraints created by proximity of designated ecological sites or heritage sites, and the site has no significant constraints in terms of land contamination, ground stability, or flood risk.

67. The Woodland Stable site, including the land promoted as GNLP5019, also benefits from being bounded by trees and is set back from Shortthorn Road, meaning there are no concerns about intrusion from incompatible neighbouring uses. As the site includes mature trees/ woodland and grassland and therefore has the potential to support priority habitats as well as protected species such as bats, reptiles and breeding birds, a Preliminary Ecological Appraisal is likely to be required. In addition, the site is located within a great crested newt 'amber zone' and therefore has the potential to impact on newts.

68. As with many locations in Greater Norwich, mitigation of the impacts on nutrient levels in river catchments will be required.

69. In summary, the Woodland Stable site is suitable for expansion to 17 pitches, subject to detailed considerations such as design layout. On this basis GNLP5019 is considered suitable as a favoured option for allocation.

Availability and Achievability Conclusions

70. GNLP5019 is in private ownership and the landowner is willing to make the site available for Gypsy and Traveller accommodation use. The owners would be likely to progress this proposal quickly, so 1 to 3 years is considered ample time to market the land, gain planning permission and to develop the site.

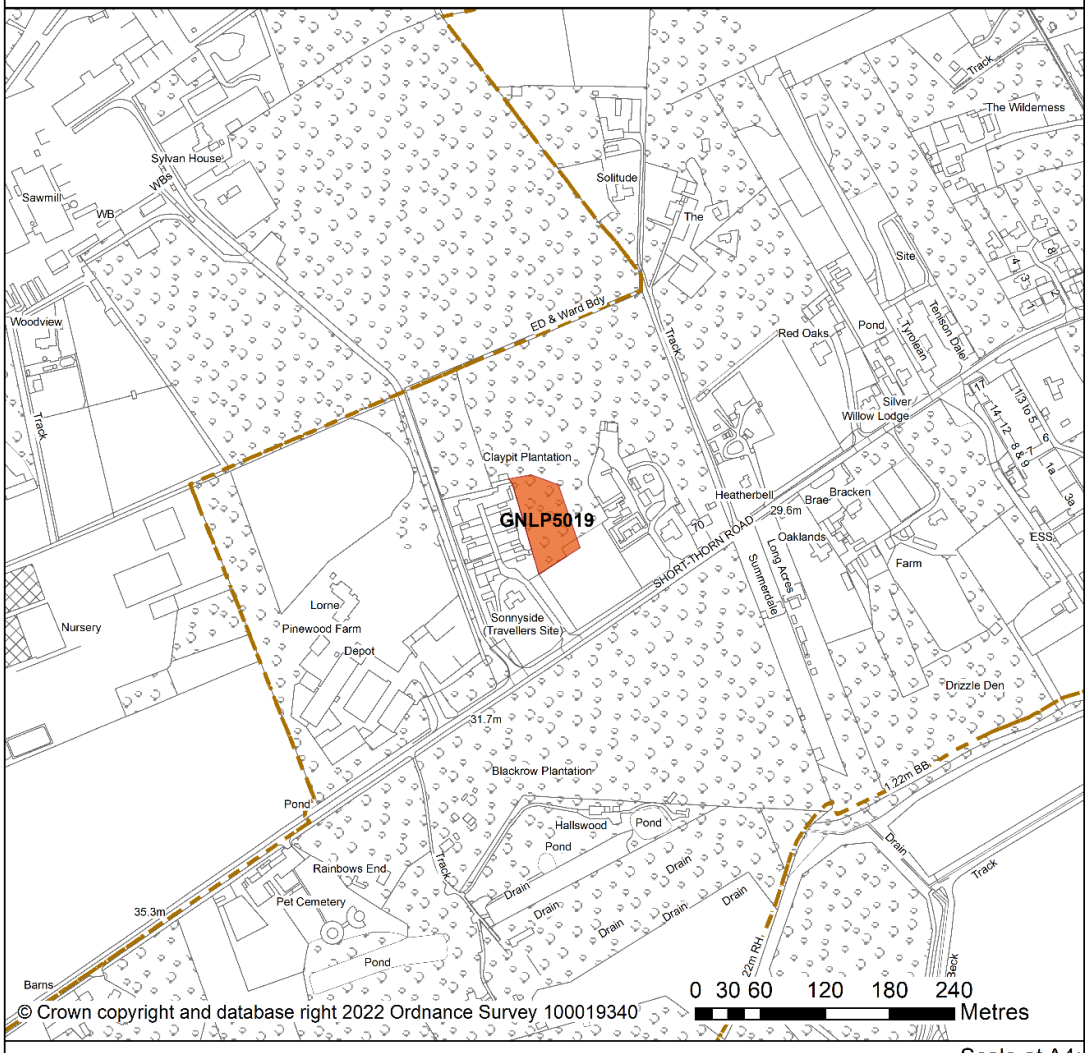
Overall Conclusions for Site

71. Subject to the caveats identified above, GNLP5019 is considered suitable as a favoured option for allocation. If allocated in the local plan, GNLP5019 could be completed by March 2025.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

STRATTON STRAWLESS

Site Reference: GNLP5019
Location: Land at Woodland Stable, Shortthorn Road, Stratton Strawless
Description: 8 additional residential pitches for Gypsies and Travellers
Area: 0.33 ha



Parish: Carleton Rode
Suitability Assessment

Site reference: GNLP5020	**Site area: 0.54 Ha**
LOCATION: Romany Meadow, The Turnpike, Carleton Rode **District**: South Norfolk	**PROPOSED DEVELOPMENT:** To provide an additional 6 pitches to extend the site to 12 pitches in total

CONSTRAINTS ANALYSIS

Site Access	Green
Accessibility to Services	Amber
Utilities Capacity	Green
Utilities Infrastructure	Green
Contamination and Ground Stability	Green
Flood Risk	Amber
Market Attractiveness	Green

IMPACTS ANALYSIS

Significant Landscapes	Amber
Sensitive Townscapes	Green
Biodiversity and Geodiversity	Amber
Historic Environment	Amber
Open Space and GI	Green
Transport and Roads	Green
Compatibility with neighbouring Uses	Green

SITE SUITABILITY CONCLUSIONS

72. GNLP5020 is a proposal to extend a well-established privately owned Gypsy and Traveller site known as Romany Meadow which is located on the B1113 (The Turnpike) at Carleton Rode. The planning history on this site goes back to 2009 when 6 pitches were granted planning permission (reference 2009/0086). Since then, subsequent applications have amended conditions to allow Gypsy and Traveller families to occupy the site that are not related to the owner, and the design of a building has been revised to allow the storage of horse drawn touring caravans.

73. The GNLP5020 proposal is to expand the site on land immediately to the east of the existing site to provide 6 additional pitches. The proposal would grow Romany Meadow using the existing site access to a total of 12 pitches on a relatively compact area of land adjacent to the B1113.

74. The distance to services and facilities is a constraint. The nearest village is New Buckenham, which is 2.5 kilometres to the west along the B1113, with

Old Buckenham 5 kilometres away. Romany Meadows has direct access to the 'A' and 'B' class road network.

75. There are flood risk, landscape and heritage issues that will require mitigation. In terms of flood risk, a surface water flow path passes through the southern part of the site, so the layout of the site should avoid development in this area. In terms of landscape and heritage, the surrounding countryside is open with scattered listed farm buildings and cottages nearby. Of these the most likely to be affected are the Grade II listed cottages which are 300 metres to the north-east of the site. While there are no significant constraints created by proximity of designated ecological sites, an ecological assessment is required due to the proximity of nearby mature trees and hedgerows. Additional tree planting should be provided to minimise landscape impacts.

76. In other respects, GNLP5020 performs well against the assessment criteria. and the site is not constrained by land contamination or ground stability issues. The market attractiveness of the site is reflected in the demand from the Gypsy and Traveller community to extend it.

77. The Romany Meadow site is considered suitable for expansion to 12 pitches, subject to detailed design layout considerations. On this basis site GNLP5020 is considered suitable as a favoured option for allocation.

Availability and Achievability Conclusions

78. The site is in private ownership and the landowner is willing to make the site available for Gypsy and Traveller accommodation use. The owner would be likely to progress this proposal quickly, so 1-3 years is considered ample time to market the land, gain planning permission and to develop the site.

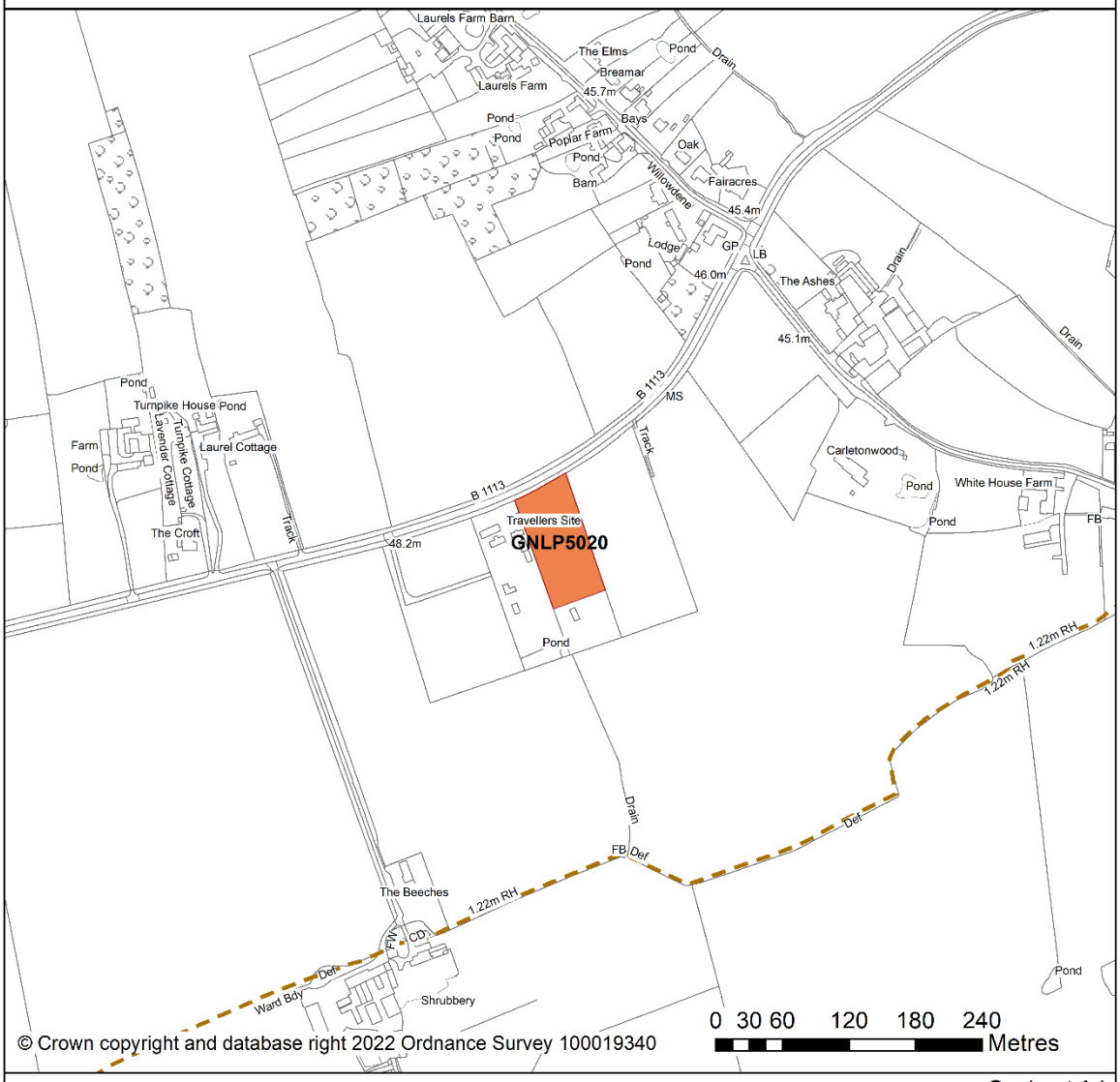
Overall Conclusions for Site

79. Subject to the caveats identified above, GNLP5020 is considered suitable as a favoured option for allocation. If allocated in the local plan, GNLP5020 would be deliverable within 5 years and could be completed by March 2025.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

CARLETON RODE

Site Reference: GNLP5020
Location: Land at Romany Meadow, The Turnpike, Carleton Rode
Description: Approximately 6 residential pitches for Gypsies and Travellers
Area: 0.54 ha



Gypsy and Traveller Site

Parish Boundary

Scale at A4: 1:5,000

N

Date: 01/11/2022

Parish: Horsford
Suitability Assessment

Site reference: GNLP5021	**Site area: 0.9**
LOCATION: Land at the Old Produce Shop, Holt Road, Horsford **District**: Broadland	**PROPOSED DEVELOPMENT:** Expansion of an existing site with 1 pitch to provide a permanent residential Gypsy and Travellers site for 7 pitches

CONSTRAINTS ANALYSIS

Site Access	Green
Accessibility to Services	Amber
Utilities Capacity	Green
Utilities Infrastructure	Amber
Contamination and Ground Stability	Green
Flood Risk	Green
Market Attractiveness	Green

IMPACTS ANALYSIS

Significant Landscapes	Green
Sensitive Townscapes	Green
Biodiversity and Geodiversity	Green
Historic Environment	Green
Open Space and GI	Green
Transport and Roads	Green
Compatibility with neighbouring uses	Amber

SITE SUITABILITY CONCLUSIONS

80. GNLP5021 is promoted as an extension to an existing Gypsy and Traveller site at the Old Produce Shop, Horsford. It is located to the south-east of Horsford, off the Holt Road, near where the road has been stopped-off close to the A1270 Broadland Northway junction with the A140 Cromer Road.

81. There is currently 1 pitch on the site which was approved in 2013 (reference 20120414) and the land is now promoted for an additional 6 pitches to give a total of 7 pitches. The land put forward as GNLP5021 is within the curtilage of the existing site and given that the site measures 0.9 ha the addition of a further 6 pitches is considered a realistic and achievable proposal.

82. Access to services is somewhat of a constraint as the site is 2 kilometres from services in Horsford. Although the Holt Road is stopped-off to through traffic

and so is little used, there is no footpath from the site to Horsford until the roundabout junction at Brewery Lane which is 1 kilometre from the site. Services are also accessible in Horsham St. Faiths to the north-east via a dedicated pedestrian/cycle route.

83. A further constraint is the proximity of GNLP5021 to the A1270 Broadland Northway, which at its nearest point is 100 metres from the junction with the A140 and Norwich Airport which is approximately 2.5 kilometres away. While trees adjacent to the new road are becoming established, additional landscaping and possibly acoustic fencing may be required.

84. GNLP5021 performs relatively well against the other assessment criteria. The existing vehicle access from the Holt Road could serve the additional pitches, there is good access to the wider 'A' and 'B' class road network, there are no known concerns over land contamination and ground stability, the site is in Flood Zone 1 and utilities already serve the site.

85. GNLP5021 is neighboured by agricultural fields to its east, north and west, with heritage features further away and unlikely to be affected by expanding the site. The Scheduled Ancient Monument Horsford Castle is 1.2 kilometres to the north and the nearest listed buildings on the southern edge of Horsford, including the Grade II* Church of All Saints, are over 1 kilometre to the north-west.

86. There are no ecological designations in close proximity to GNLP5021 that are likely to be adversely affected by the proposed development. The nearest County Wildlife Sites are Black Park & Thicket 1.2 kilometres to the north, Canham's Hill 1.2 kilometres to the south-west and Horsham Meadows which is 1.3 kilometres to the north-east. There are also no significant mature trees or hedgerows on GNLP5021 that raise particular ecological concerns.

87. The market attractiveness of the site is reflected in the demand from the Gypsy and Traveller community to extend it.

88. As with many locations in Greater Norwich, mitigation of the impacts on nutrient levels in river catchments will be required.

89. In summary, GNLP5021 is considered suitable as a favoured option for allocation.

Overall Conclusions for Site

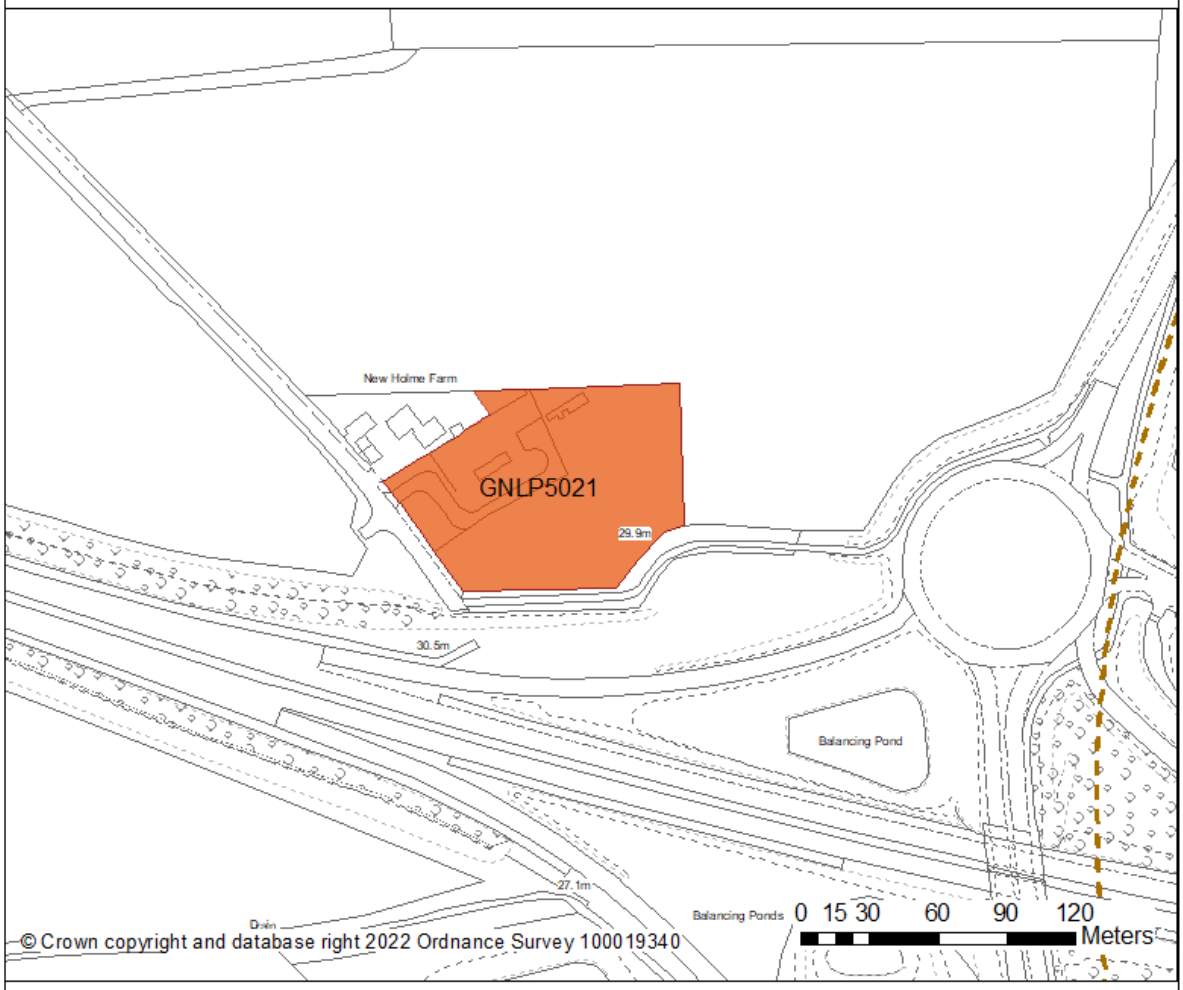
Availability and Achievability Conclusions

90. GNLP5021 is in private ownership and the landowner is willing to make the site available for Gypsy and Traveller accommodation use. As a relatively unconstrained greenfield site there is no reason why development could not come forward quickly. 1 to 3 years is considered sufficient time to gain planning permission and to develop the site.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

LAND AT THE OLD PRODUCE SHOP, HOLT ROAD, HORSFORD

Site Reference:	GNLP5021
Location:	Land at the Old Produce Shop, Holt Road, Horsford
Description:	6 additional residential pitches for Gypsies and Travellers
Site Area:	0.9 ha



Legend

- Proposed Gypsy and Traveller Site
- Parish Boundary
- Settlement Boundary

Scale at A4: 1:2,500

N

Date: 28/11/2022

Parish: Foulsham
Suitability Assessment

Site reference: GNLP5022	**Site area: 3.1 ha**
LOCATION: Land at the Oaks, south-east of Letter Box Cottage, Reepham Road, Foulsham **District**: Broadland	**PROPOSED DEVELOPMENT:** Expansion of an existing site of 2 pitches by 5 further pitches to provide a permanent residential Gypsy and Travellers site for 7 pitches.

CONSTRAINTS ANALYSIS

Site Access	Amber
Accessibility to Services	Amber
Utilities Capacity	Green
Utilities Infrastructure	Amber
Contamination and Ground Stability	Green
Flood Risk	Amber
Market Attractiveness	Green

IMPACTS ANALYSIS

Significant Landscapes	Amber
Sensitive Townscapes	Green
Biodiversity and Geodiversity	Amber
Historic Environment	Green
Open Space and GI	Green
Transport and Roads	Amber
Compatibility with neighbouring Uses	Green

SITE SUITABILITY CONCLUSIONS

91. GNLP5022 is a proposal to extend a well-established privately owned Gypsy and Traveller site by 5 further pitches to 7 pitches in total.

92. The site is located off the Reepham Road, which is part of a local road network which is narrow with some poor alignments and lacks lighting or pavements. Further development of the site will require investigation of highway safety, including of vehicle speeds along Reepham Road, with widening of the visibility splay at the site entrance as appropriate. There is also somewhat limited access to the “A” and B class road network.

93. GNLP5022 is approximately 2 kilometres from the village of Foulsham which has a limited range of services and facilities which include a school. The

nearest bus stop, which provides regular links to Fakenham and Norwich, is at the far end of the village some 3 kilometres from the site.

94. The site has access to utilities infrastructure. The National Grid Bacton to Kings Lynn gas pipeline crosses below the site from east to west and a surface water flow path of 1 in 1,000 probability affects the central portion of the site. However, the northern section of the site is not impacted by the pipeline or flood risk. Whilst further investigation of these issues will be necessary, it is considered that locating development in the north of the site will address these constraints.

95. An ecological survey will be required as there are a number of protected habitats and sites within 2.5 kilometres of the site. These are:
    - Foxley Wood (SSSI) 950 m to the south of the site;
    - The Marriott's Way (CWS) 570 m to the east;
    - Land adjacent to disused railway (CWS) 1,120 m to the east of the site;
    - Moat Meadow near Bates Moor (CWS) 1,700 m to the west,
    - Westfield Meadow (CWS) 2,500 m to the south-west and
    - Barney Brickyard, a county geodiversity candidate site which is 2,300 m to the north-west.

96. As the site is classified as grade 3 agricultural land and is currently a Gypsy and Traveller Site there would be no loss of high-quality agricultural land resulting from expanding the site. There would also be no loss of open space resulting from this development proposal.

97. GNLP5022 presents no substantive concerns in relation to heritage constraints as the nearest listed buildings are at some distance from the site:
    - The Old Hall is 280 m to the east,
    - Old Hall Farm House is 480 m to the north-west,
    - St Andrews Church is 320 m to the south-west and
    - Manor Farm House is 720 m to the west.

98. The site has been landscaped with significant tree planting by the disused railway to the south of the site. These trees would need to be retained, with additional soft landscaping required to the north of the site to complement the layout of additional pitches.

99. The market attractiveness of the site is reflected in the demand from the Gypsy and Traveller community to extend it. The Oaks site is considered suitable for expansion to 7 pitches subject to detailed consideration of the impact of the gas pipeline, flood risk, design layout, landscaping and an ecological survey. On this basis GNLP5022 is considered appropriate for allocation.

Overall Conclusions for Site

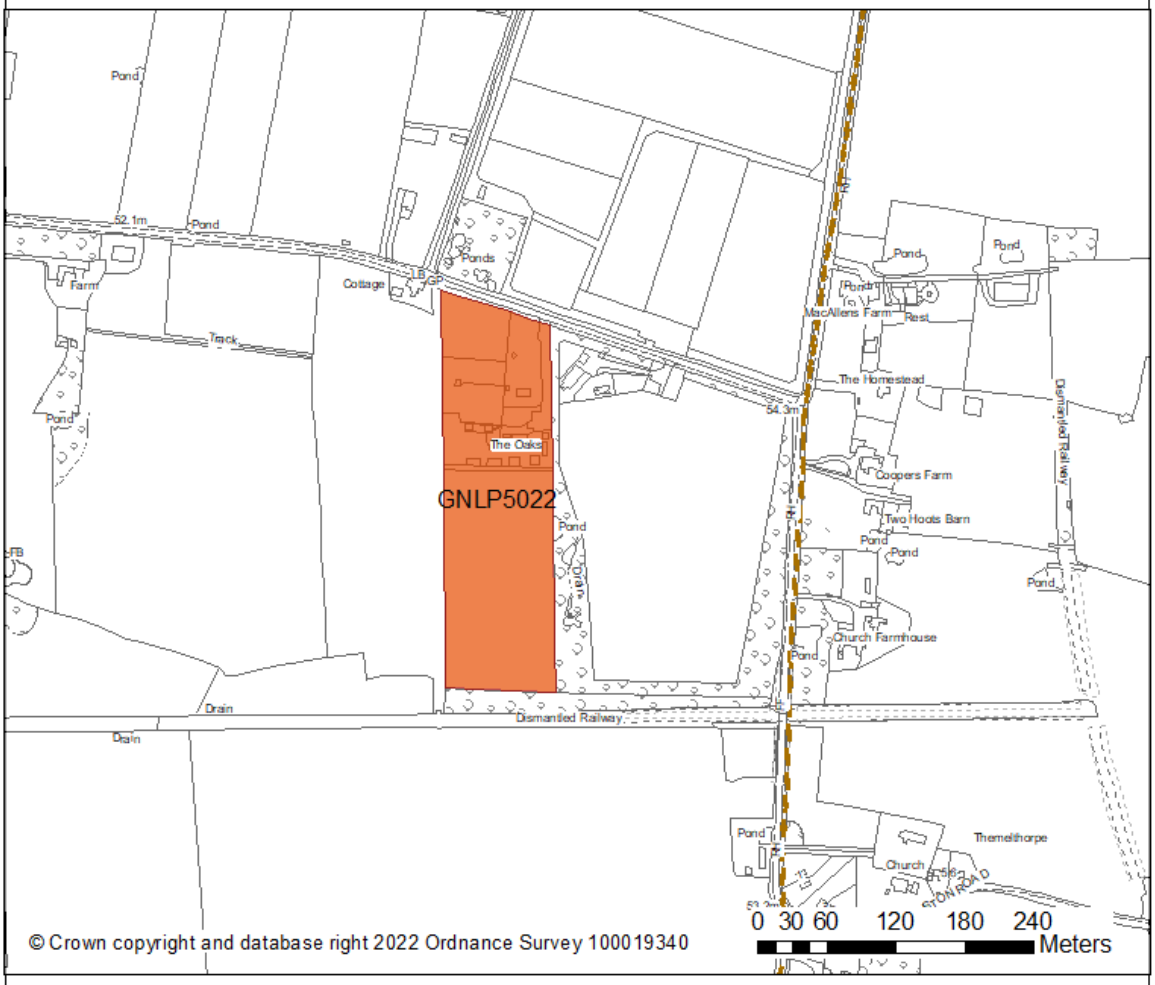
Availability and Achievability Conclusions

100. Subject to the caveats identified above, GNLP5022 is considered suitable as a favoured option for allocation. If allocated in the local plan, the additional pitches would be likely to come forward quickly over the next 1-3 years.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

LAND AT THE OAKS, FOULSHAM

Site Reference:	GNLP5022
Location:	Land at the Oaks, Foulsham
Description:	5 additional residential pitches for Gypsies and Travellers
Site Area:	3.1 ha



Legend

- Proposed Gypsy and Traveller Site
- Parish Boundary
- Settlement Boundary

Scale at A4: 1:5,000

N

Date: 28/11/2022

Parish: Wymondham
Suitability Assessment

Site reference: GNLP5023	**Site area: 1.1 Ha**
LOCATION: Land off Strayground Lane, Wymondham **District**: South Norfolk	**PROPOSED DEVELOPMENT:** A permanent residential Gypsy and Travellers site for 10 pitches

CONSTRAINTS ANALYSIS

Site Access	Amber
Accessibility to Services	Amber
Utilities Capacity	Amber
Utilities Infrastructure	Amber
Contamination and Ground Stability	Amber
Flood Risk	Green
Market Attractiveness	Green

IMPACTS ANALYSIS

Significant Landscapes	Green
Sensitive Townscapes	Green
Biodiversity and Geodiversity	Amber
Historic Environment	Green
Open Space and GI	Green
Transport and Roads	Green
Compatibility with neighbouring uses	Amber

SITE SUITABILITY CONCLUSIONS

101. Site GNLP5023 is a 1.1 hectare privately owned site which has been put forward by the owner for approximately 10 residential Gypsy and Traveller pitches and is immediately available for development. The site is located on Strayground Lane, south of the existing Wymondham Recycling Centre and north of the Norwich to Cambridge railway line.

102. GNLP5023 has an access point at its north-eastern corner which would require improvement; or, alternatively, depending on the trees and hedgerow along the land's eastern boundary, other points of access could be achievable to Strayground Lane. As Strayground Lane and the adjoining Whartons Lane which links site GNLP5023 back to the B1172 London Road are narrow, improvements to the passing bays on the Strayground Lane will be required and visibility issues at the London Road junction will need to be addressed.

103. There are no footpaths on Strayground Lane, but as it is a quiet road, pedestrians and cyclists would be able to use this route. There is a local shop approximately 700 metres away and Browick Road Primary School is approximately 1 kilometre away.

104. An ecological assessment will be required as the western boundary of the site is adjacent to the Bays River, which is lowland fens priority habitat and a designated County Wildlife Site. The retention of trees and hedgerows should form part of the assessment.

105. Whilst not prohibiting possible development, there are other issues resulting from past and present on-site and neighbouring uses which may impact on the form of development:

- A paving company adjoins the site to its north. This will cause impacts from vehicle movements, noise and possibly dust. Screening will therefore be required.
- The northern half of the site is a historic landfill site so contamination investigation and possibly mitigation will be required.
- There are various planning consents dating back to the 1990s for a gravel quarry, stockpiling aggregates, and landfilling of inert waste (references include C/92/7023 and C/94/7016) to the north-east of the site.

106. GNLP5023 is in the catchment of a groundwater Source Protection Zone (Zone III) and as such pollution mitigation measures for water quality would be required.

107. The site presents few concerns in relation to the remaining assessment criteria:

- The nearest listed buildings are some distance away and are separated by the industrial area along Chestnut Drive.
- The site is in Flood Zone 1. A small area to the west and south-west of the site is within flood zone 2 and 3a and the site boundary has been redrawn to exclude it. Development should not be located close to this area.
- The site is close to the ‘A’ and ‘B’ class road network and to public transport and its location suggests it would be attractive to the market.

108. As with many locations in Greater Norwich, mitigation of the impacts on nutrient levels in river catchments will be required. Subject to addressing access and site constraints and the design of development taking account of site investigations and providing screening, GNLP5023 is considered suitable as a favoured option for allocation.

Overall Conclusions for Site

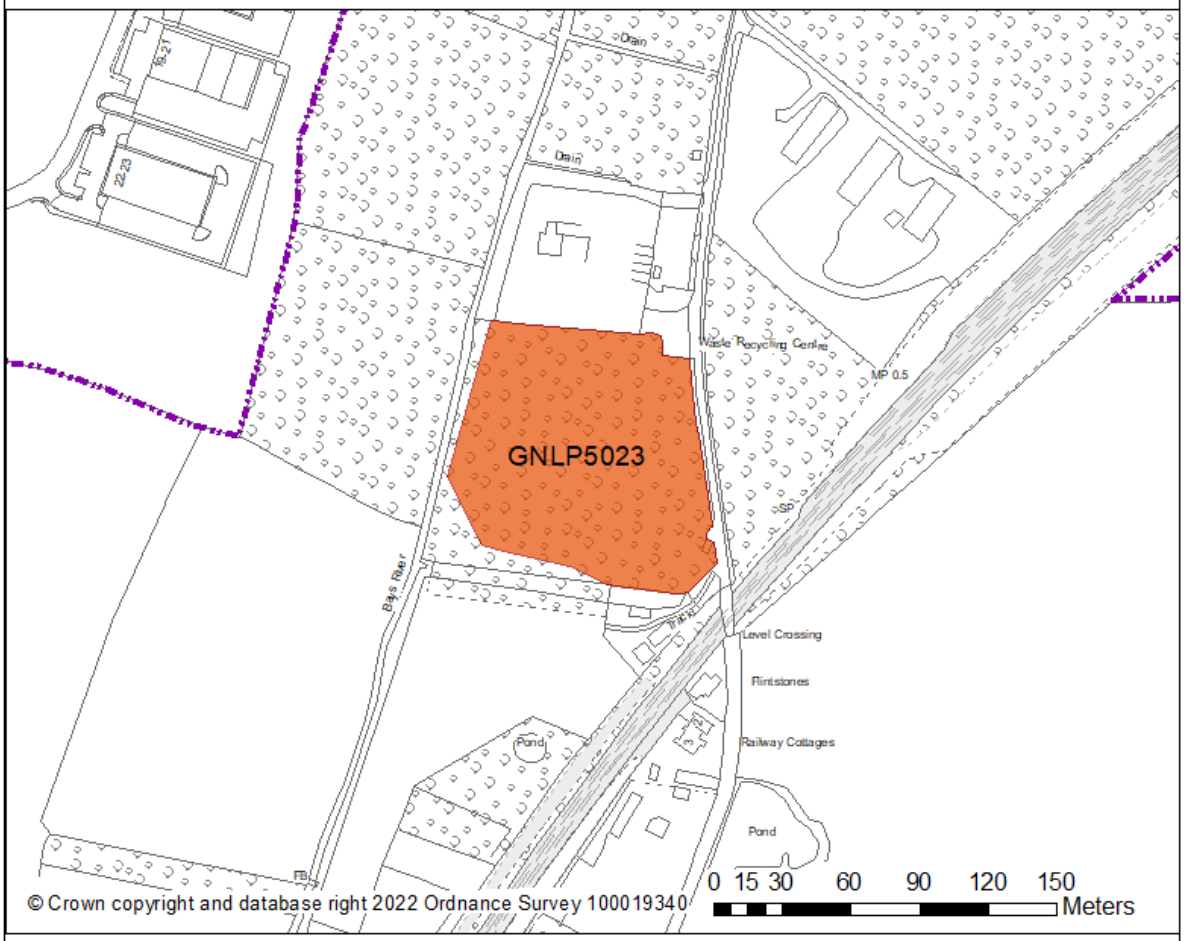
109. GNLP5023 is in private ownership and the landowner has stated that the site is available immediately and as such development could come

forward relatively quickly. 3 to 5 years is thought to be sufficient time to market the land, gain planning permission and to develop the site.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

LAND AT STRAYGROUND LANE, WYMONDHAM

Site Reference:	GNLP5023
Location:	Land at Strayground Lane, Wymondham
Description:	Approximately 10 residential pitches for Gypsies and Travellers
Site Area:	1.1 ha



Legend

- Gypsy_and_Traveller_Broad_Location
- Parish Boundary
- Settlement Boundary

Scale at A4: 1:2,500

N

Date: 06/12/2022

Parish: Carleton Rode
Suitability Assessment

Site reference: GNLP5024	**Site area: 0.62 Ha**
LOCATION: Land off Upgate Street, Carleton Rode **District**: South Norfolk	**PROPOSED DEVELOPMENT:** A permanent residential Gypsy and Travellers site for 4 additonal pitches, expanding the site from 2 to 6 pitches in total.

CONSTRAINTS ANALYSIS

Site Access	Amber
Accessibility to Services	Amber
Utilities Capacity	Green
Utilities Infrastructure	Green
Contamination and Ground Stability	Green
Flood Risk	Green
Market Attractiveness	Green

IMPACTS ANALYSIS

Significant Landscapes	Green
Sensitive Townscapes	Green
Biodiversity and Geodiversity	Amber
Historic Environment	Amber
Open Space and GI	Green
Transport and Roads	Green
Compatibility with neighbouring Uses	Green

SITE SUITABILITY CONCLUSIONS

110. GNLP5024 is a proposal to extend a well-established privately owned Gypsy and Traveller site located on Upgate Street at Carleton Rode from 2 to 6 pitches. The site was initially granted permission in 2010. The site is 0.62 hectares in size and the addition of 4 further pitches is considered appropriate.

111. However, the distance to services is a constraint. The nearest villages with local services are New Buckenham, which is 1.7 kilometres to the south-west and Old Buckenham, which is 5 kilometres away. There is no footpath provision, but some of the quiet lanes such as Wymondham Road, which is stopped-off to through traffic and provides a direct route to New Buckenham, could be used for walking and cycling. Further evidence/speed data would be

needed to demonstrate acceptability in relation to site access and visibility requirements.

112. The Upgate Street site is surrounded by agricultural fields, there are no immediate neighbouring properties and the site itself is bounded by established trees and hedgerows, minimising impacts on the landscape and the setting of nearby heritage assets. The site is adjacent to Bunns Bank Linear Earthwork, which elsewhere in its course is a Scheduled Monument, so this should be taken into consideration in design. While the Grade II listed South Farmhouse is in close proximity, there is effective screening by hedgerows and trees.

113. New Buckenham Common is approximately 250 metres to the south-west, but it is unlikely that the addition of 4 Gypsy and Traveller pitches would pose a significant adverse effect on ecology. The site is unlikely to support priority habitats, however, boundary trees and hedgerows have the potential to support protected species such as bats and breeding birds. Therefore, a Preliminary Ecological Appraisal is likely to be required and the veteran tree on the northern boundary of the site should be retained.

114. In other respects, GNLP5024 performs well against the assessment criteria. There are no constraints from contamination or ground stability, the site is in Flood Zone 1, is not at risk of surface water flooding and there are existing utilities at the site. The market attractiveness of the site is reflected in the demand from the Gypsy and Traveller community to extend it.

115. Overall, GNLP5024 is suitable for expansion to 6 pitches, subject to detailed considerations, in particular in relation to safe access. On this basis GNLP5020 is considered suitable as a favoured option for allocation.

Overall Conclusions for Site

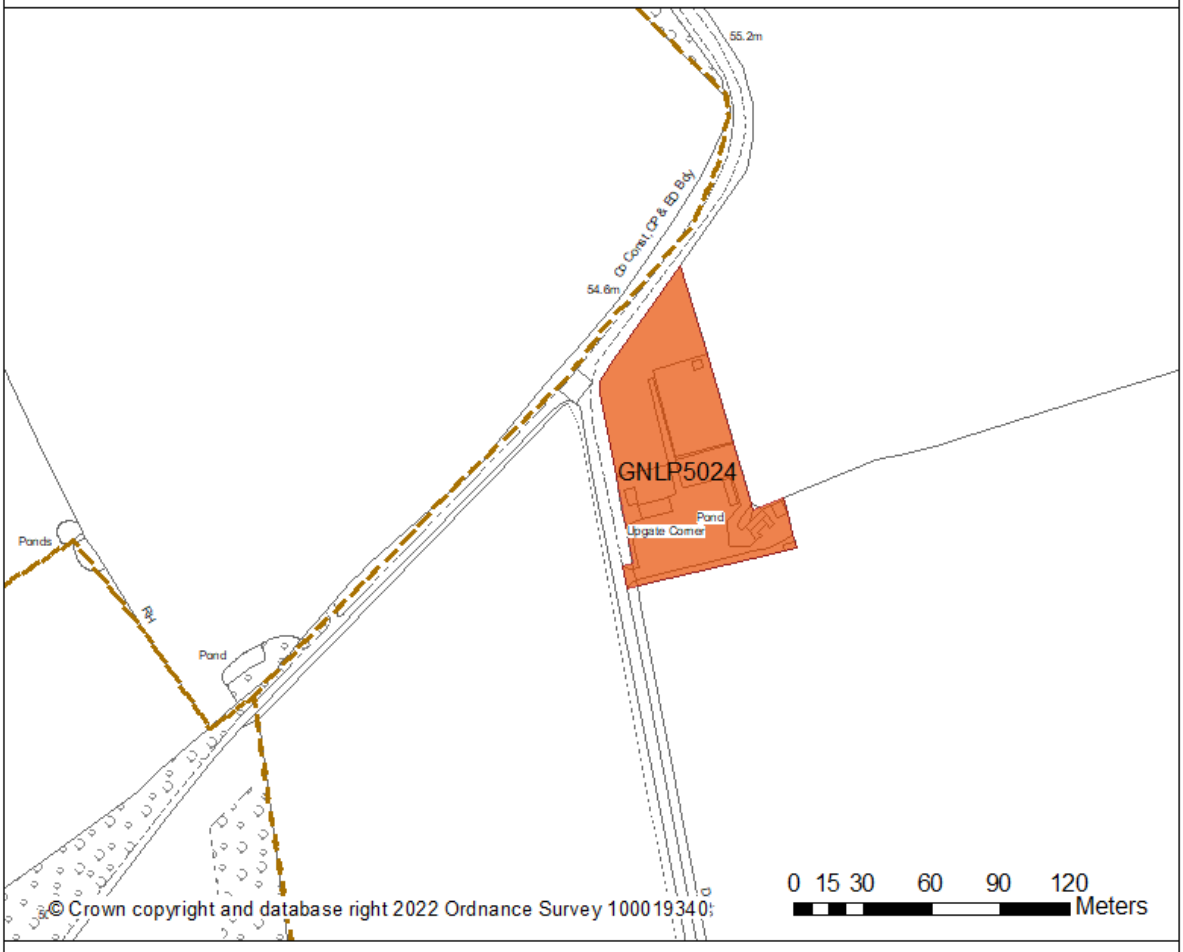
Availability and Achievability Conclusions

116. GNLP5024 is in private ownership and the landowner is willing to make the site available for more Gypsy and Traveller accommodation use quickly. Consequently, it is anticipated that development could come forward in 1 to 3 years.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

LAND AT UPGATE STREET, CARLETON RODE

Site Reference:	GNLP5024
Location:	Land at Upgate Street, Carleton Rode
Description:	4 additional residential pitches for Gypsies and Travellers
Site Area:	0.62 ha



Legend

- Gypsy and Traveller Broad Location
- Parish Boundary
- Settlement Boundary

Scale at A4: 1:2,500

N

Date: 28/11/2022

Reasonable Alternative Site

Parish: Ketteringham
Suitability Assessment

Site reference: GNLP5013	**Site area: 0.7 Ha**
LOCATION: Ketteringham Depot Land west of Station Lane, Ketteringham **District**: South Norfolk	**PROPOSED DEVELOPMENT:** A permanent residential Gypsy and Travellers site for 10 pitches

CONSTRAINTS ANALYSIS

Site Access	Green
Accessibility to Services	Amber
Utilities Capacity	Green
Utilities Infrastructure	Green
Contamination and Ground Stability	Amber
Flood Risk	Green
Market Attractiveness	Amber

IMPACTS ANALYSIS

Significant Landscapes	Green
Sensitive Townscapes	Green
Biodiversity and Geodiversity	Amber
Historic Environment	Green
Open Space and GI	Green
Transport and Roads	Green
Compatibility with neighbouring uses	Amber

SITE SUITABILITY CONCLUSIONS

117. This 0.7 ha brownfield site is owned by South Norfolk Council. It is currently used as a depot which is expected to be relocated. The site could accommodate 10 residential pitches for Gypsies and Travellers.

118. The site has good access to the A11 south-west bound and development would not affect the functioning of local roads. There is an established vehicular access to serve its existing use. However, accessibility to public transport and services is limited. The nearest bus stop is approximately 1.6 kilometres to the north in Hethersett, which also provides the nearest services and facilities such as primary and secondary schools and food shopping. Station Road does not have footpaths and there is no direct

safe crossing of the A11 dual carriageway. An alternative route exists via Ketteringham High Street and over a narrow bridge to Ketteringham Lane, but there are no footpaths along this significantly longer route.

119. There are no known constraints relating to utilities capacity. Ground investigation, contamination assessments, noise and air quality investigations are required as there is a Norfolk County Council depot and salt storage to the west, and a former fuel depot to the north. There will be a need for screening to neighbouring homes to the west of the site

120. The site is in flood zone 1, so is at low risk of river flooding and is not at risk of surface water flooding.

121. The proposed development is unlikely to have any impacts on biodiversity and geodiversity as there are no locally or national designated environmental sites within a 1 kilometre radius. The only designated site within a 5 kilometre radius is Eaton Chalk Pit SSSI which is designated for its hibernating bats. The closest County Wildlife Site, Ketteringham Hall Lake, is 1 kilometre to the south. The site is considered unlikely to support priority habitats, however, buildings have the potential to support protected species such as bats and barn owls, therefore a Preliminary Ecological Appraisal is likely to be required.

122. There are two ancient monuments around 500 m to the south of the site and a listed monument close to Norwich Lodge, which is a grade II listed building. There is another listed building in the vicinity (Ivy Farmhouse). However, there are no concerns over the impact of development on these buildings and structures, or issues related to the loss of protected trees. In addition, development of this site would not result in the loss of formal open space.

123. Overall, the site is suitable as a reasonable alternative for allocation, subject to suitable mitigation measures to address possible noise or odour from the waste management site nearby. As with many locations in Greater Norwich, mitigation of the impacts on nutrient levels in river catchments would be required.

Availability and Achievability Conclusions

124. South Norfolk Council is the owner of the site which is available for development.

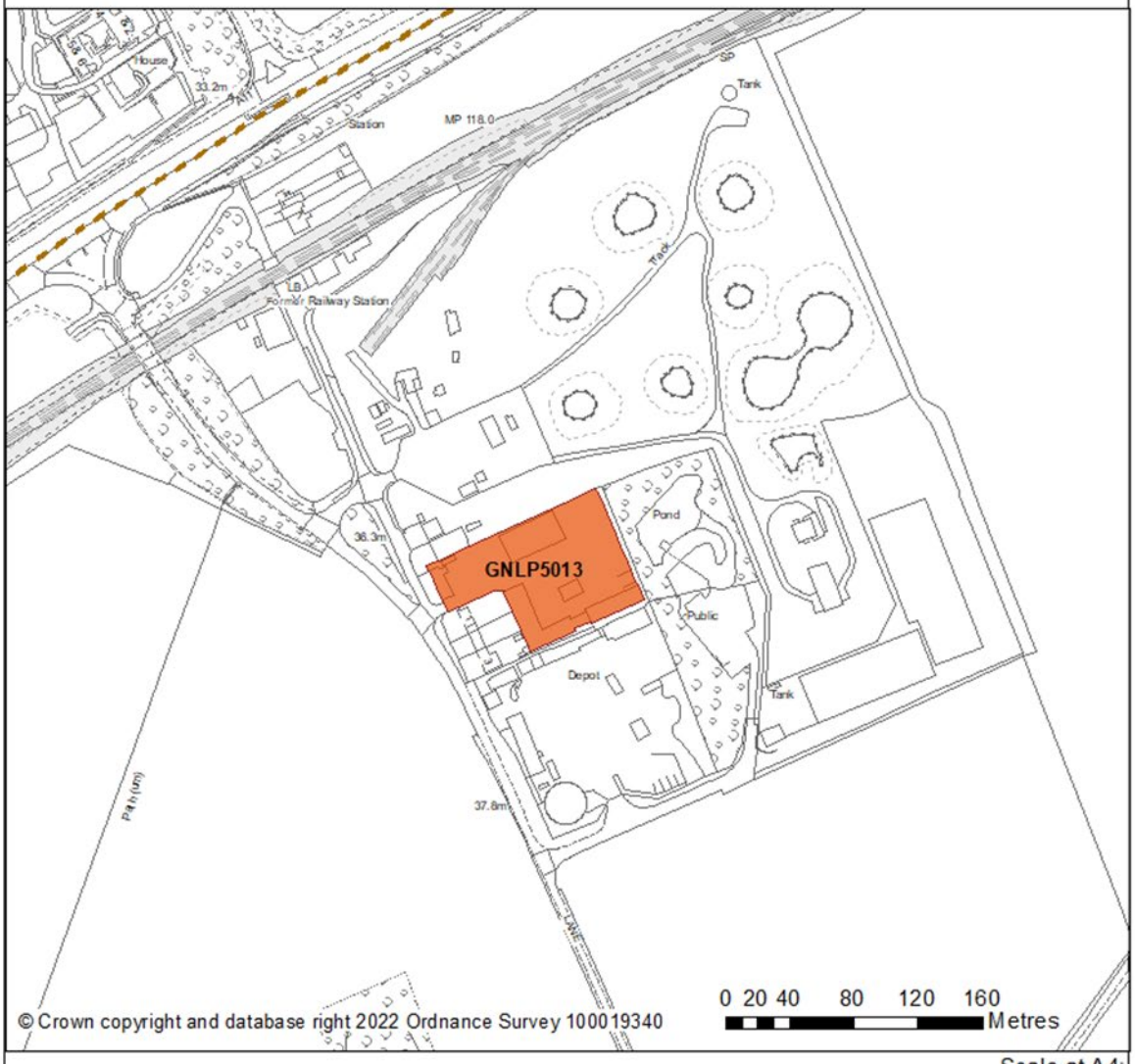
Overall Conclusions for Site

125. GNLP5013 is considered suitable as a reasonable alternative site. If allocated in the local plan, GNLP5013 would be developable within 5 to 10 years and could be completed by March 2032.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

KETTERINGHAM

Site Reference: GNLP5013
Location: Land at Ketteringham Depot
Description: Reasonable Alternative for approximately 10 residential pitches for Gypsies and Travellers
Area: 0.7 ha



Gypsy and Traveller Site

Parish Boundary

Scale at A4: 1:3,500

N

Date: 30/11/2022

Proposed change to Contingency Site

Parish: Costessey
Suitability Assessment

Site reference: Proposed change to GNLP5081/2023	**Site area: 1 ha**
LOCATION: Land off Bawburgh Lane, north of New Road and east of the A47 (Costessey contingency site ref GNLP0581/2043) **District**: South Norfolk	**PROPOSED DEVELOPMENT:** A broad location for a permanent residential Gypsy and Travellers site for 18 pitches.

CONSTRAINTS ANALYSIS

Site Access	Amber
Accessibility to Services	Amber
Utilities Capacity	Amber
Utilities Infrastructure	Amber
Contamination and Ground Stability	Green
Flood Risk	Amber
Market Attractiveness	Green

IMPACTS ANALYSIS

Significant Landscapes	Amber
Sensitive Townscapes	Amber
Biodiversity and Geodiversity	Amber
Historic Environment	Green
Open Space and GI	Green
Transport and Roads	Green
Compatibility with neighbouring uses	Green

SITE SUITABILITY CONCLUSIONS

126. This is a proposed change to provide a variation of the contingency site GNLP5081/2043, which measures 62 ha, and is being promoted as a residential-led urban extension of approximately 800 homes. Subject to formal agreement from the landowners, the southern portion of the site is identified as a potential broad contingency location for a Gypsy and Traveller site (denoted by a star on the map below). To ensure good planning, the need for a Gypsy and Traveller site at this broad location would need to be evidenced

if and when the wider contingency site for housing is brought forward for development.

127. There is an area of land affected by surface water flood risk in the central and part of the northern area of GNLP5081/2043. GNLP5081/2043 is also in the Norwich Southern Bypass Protection Zone and is adjacent to the A47, so there could be amenity concerns from disturbance caused by traffic and screening may be required. Other constraints include providing a new site access, overhead power lines, landscape impacts, townscape impacts, and the potential for protected species on site requiring further investigation. Site constraints would need to be mitigated through a comprehensive master-planning exercise.

128. Due to its location on the edge of the urban area close to existing services and the major road network, the site is likely to be attractive to the market.

129. Site GNLP5081/2043 was considered suitable for inclusion in the land supply assessment, and that conclusion remains the same with the inclusion of a Gypsy and Traveller site into the overall proposal for an urban extension. As with many locations in Greater Norwich, mitigation of the impacts on nutrient levels in river catchments would be required.

Availability and Achievability Conclusions

130. Norwich City Council is a part owner of the land promoted as GNLP0581/2043. Subject to confirmation of agreement with the other two landowners and the need for a Gypsy and Traveller site at this broad location being evidenced if and when the site comes forward for a wider urban extension, the land required for a Gypsy and Traveller site is considered to be likely to be available for development within 4 to 6 years.

Overall Conclusions for Site

The proposed change to GNLP5081/2023 offers the potential for a Gypsy and Traveller site to be delivered in a sustainable location if and when the submitted contingency site comes forward for a wider urban extension. Evidence would need to be provided at that time that additional Gypsy and Traveller accommodation is required. Inclusion of this site in this consultation provides flexibility for later decision making.

COSTESSEY

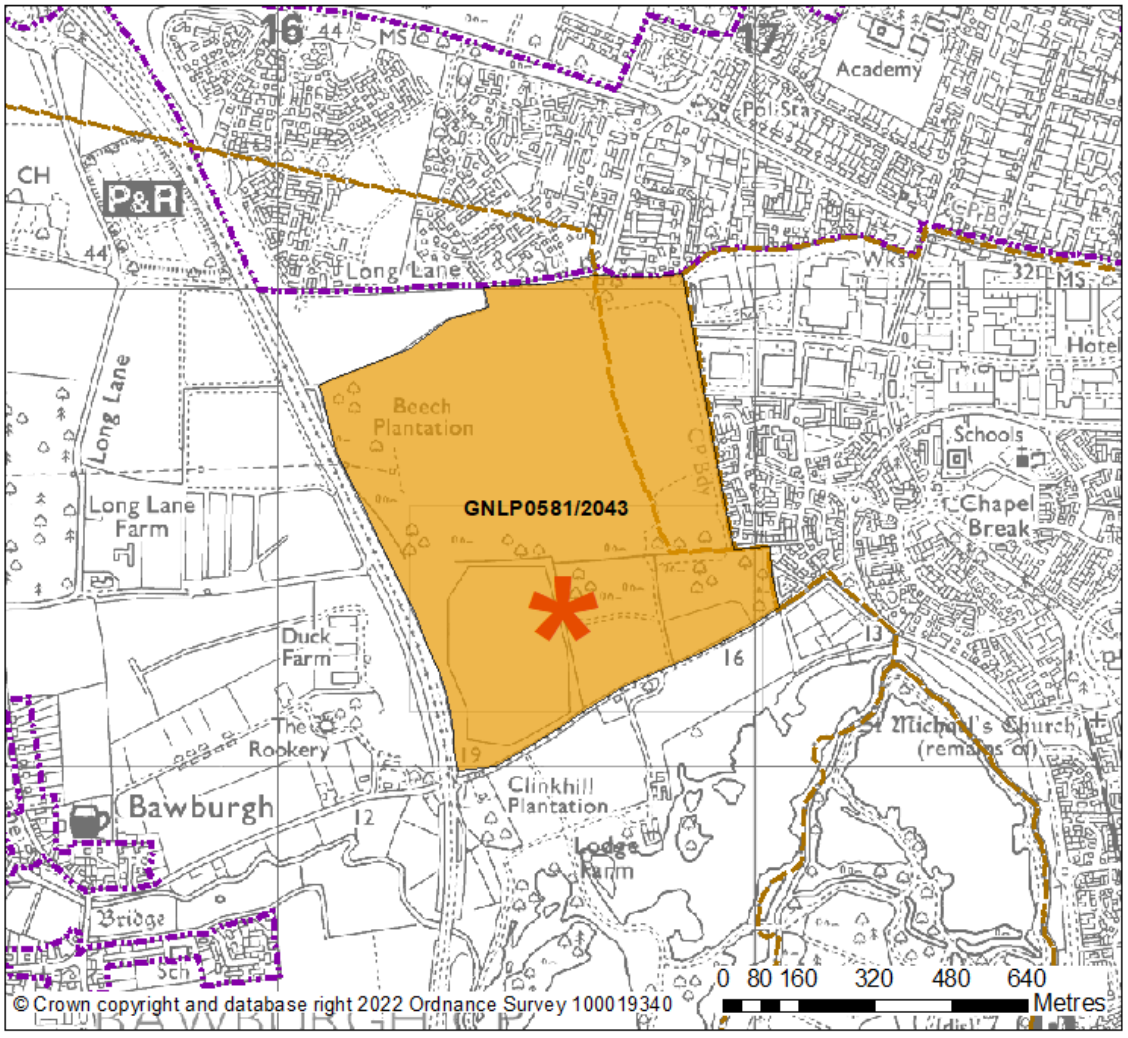
GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

Site Reference: GNLP0581/2043

Location: Land off Bawburgh Lane, north of New Road and east of the A47

Description: Should the need for the contingency site be triggered then the option would exist to provide a Gypsy and Traveller site as part of this urban extension of approximately 800 homes. The southern part of the site is the broad location for the Gypsy and Traveller site with vehicular access from New Road.

Site Area: Approximately 1 ha will be located within entire 62 ha site



Contingency Site

Parish Boundary

Settlement Boundary

Broad Location of Gypsy and Traveller Site

Scale at A4: 1:12,000

N

Date: 30/11/2022

Unreasonable Sites

Parish: Denton
Suitability Assessment

Site reference: VCHAP GT Site 1	**Site area: 0.68 Ha**
LOCATION: Land west of Grove Farm, Middle Road, Denton **District**: South Norfolk	**PROPOSED DEVELOPMENT:** A permanent residential Gypsy and Travellers site

Site reference: VCHAP GT Site 2	**Site area: 0.78 Ha**
LOCATION: Land north of Kingsland Farm, Middle Road Denton **District**: South Norfolk	**PROPOSED DEVELOPMENT:** A permanent residential Gypsy and Travellers site

CONSTRAINTS ANALYSIS

Site Access	Red
Accessibility to Services	Red
Utilities Capacity	Green
Utilities Infrastructure	Green
Contamination and Ground Stability	Green
Flood Risk	Amber
Market Attractiveness	Amber

IMPACTS ANALYSIS

Significant Landscapes	Red
Sensitive Townscapes	Red
Biodiversity and Geodiversity	Green
Historic Environment	Amber
Open Space and GI	Green
Transport and Roads	Red
Compatibility with neighbouring Uses	Amber

131. Two areas of land in Denton, measuring 0.68 ha and 0.78 ha, were promoted in 2021 as Gypsy and Traveller sites through the public consultation for the South Norfolk Village Clusters Housing Allocations Plan (VCHAP). The

two sites are both on Middle Road, located less than 100 metres apart, and are either side of Grove Farm. Whilst being very similar in locational terms, a key difference is Site 1 is partially covered by farm buildings and Site 2 is used as paddocks.

132. There is a significant planning history to Site 2, where there have been appeal decisions against developing a Gypsy and Traveller site – see planning applications 2004/0495 and 2006/0797. While the following appeal refusal criteria apply directly to Site 2, the close proximity of Site 1 makes them applicable here as well:

- highway safety on Middle Road
- the relationship to the primary road network and the distance to facilities
- the effect on the greenfield setting of two listed buildings
- the landscape visual impact and
- the amenity impact for nearby residents.

133. The inspectors stated that as Middle Road is narrow, and due to its location, access to services would be dependent upon having access to a vehicle. The remoteness of the location is evidenced by the distance to schools: Earsham Primary School is 6 kilometres away, Harleston Primary School is 7 kilometres and it is 10 kilometres to Bungay High School. These factors present significant constraints when considering the sites against the assessment criteria.

134. Other notable constraints are the impacts on listed buildings and surface water flood risk. Kingswood Farm and Grove Cottages are Grade II listed buildings and the setting of both would be affected by the development of a Gypsy and Traveller site in this location. A lesser constraint is flood risk as there are areas at 1 in 1,000 and 1 in 100 flood risk probability on both Sites 1 and 2 that would warrant consideration if the sites were to be developed.

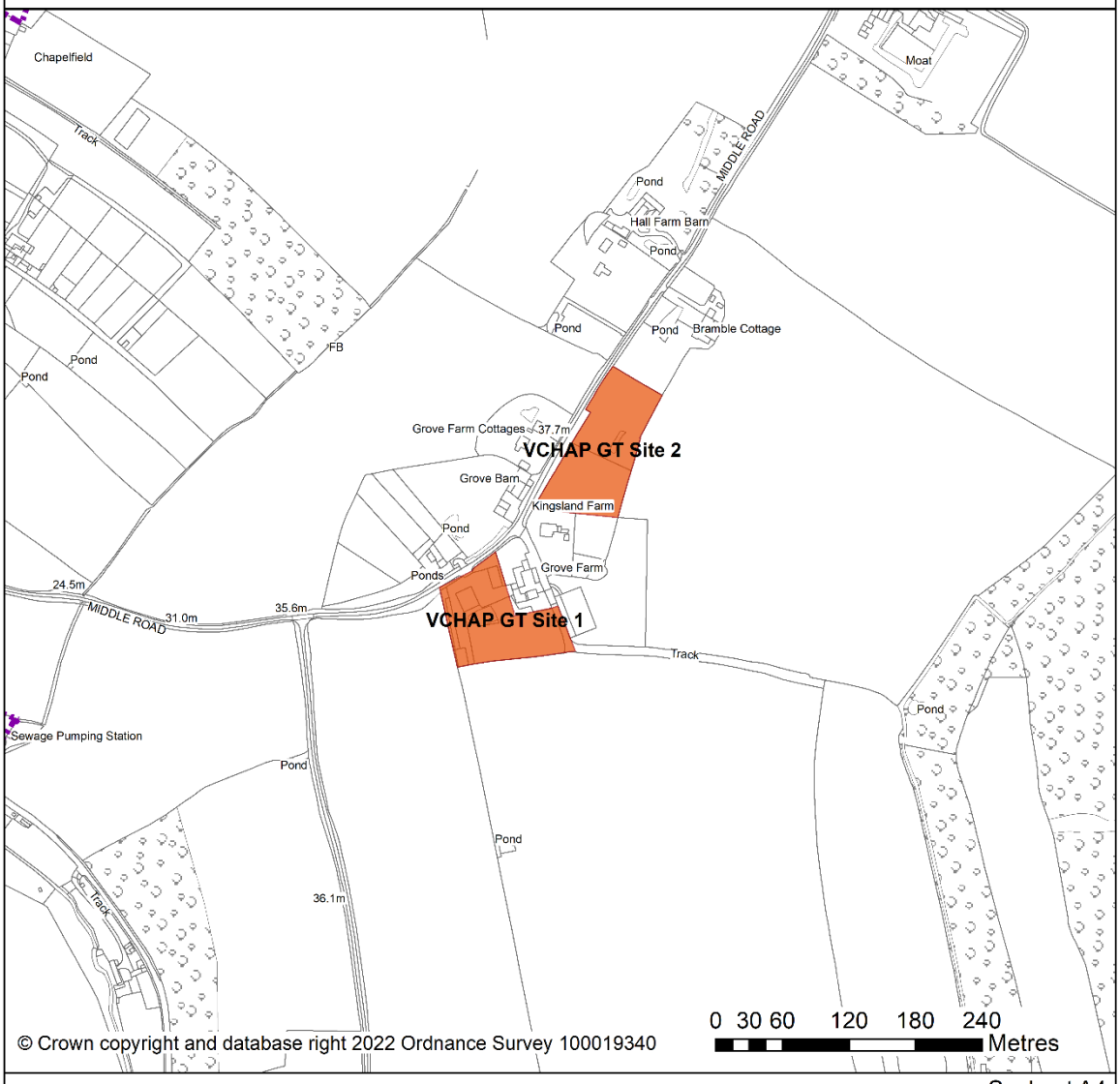
135. Ecological impacts are less of a concern because the nearest designations are some distance away. The nearest is Wayside County Wildlife Site which is 300 metres to the north-east and East Wood County Wildlife Site is 500 metres to the east. The River Waveney is 1.7 kilometres away, making it unlikely that development would have any adverse impact on this habitat and landscape.

136. In summary, there are significant concerns in relation to these sites, most notably about highways, the distance to facilities and the impact on the setting of adjacent listed buildings. For these reasons Sites 1 and 2 are not considered suitable for allocation.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

DENTON

Site Reference: VCHAP GT Site 1 and VCHAP GT Site 2
Location: Grove Farm, Middle Road, Denton
Area: 0.68 ha and 0.78 ha



Parish: Wymondham
Suitability Assessment

Site reference: VCHAP GT Site 3	**Site area: 3.34 Ha**
LOCATION: Land off London Road, Suton, Wymondham **District**: South Norfolk	**PROPOSED DEVELOPMENT:** A permanent residential Gypsy and Travellers site for 8 pitches

CONSTRAINTS ANALYSIS

Site Access	Red
Accessibility to Services	Red
Utilities Capacity	Green
Utilities Infrastructure	Green
Contamination and Ground Stability	Green
Flood Risk	Amber
Market Attractiveness	Amber

IMPACTS ANALYSIS

Significant Landscapes	Red
Sensitive Townscapes	Red
Biodiversity and Geodiversity	Green
Historic Environment	Amber
Open Space and GI	Green
Transport and Roads	Red
Compatibility with neighbouring Uses	Amber

SITE SUITABILITY CONCLUSIONS

137. VHCAP Site 3, which measures 3.35 ha, is located on the B1172 London Road, 4.2 kilometres from the centre of Wymondham and 5.4 kilometres from the centre of Attleborough. It has been largely built out as a Gypsy and Traveller site for 8 pitches, but a planning appeal to allow the scheme was dismissed in June 2021. As of December 2022 consideration is ongoing as to when the unlawful development shall be fully vacated.

138. The site's accessibility to services is a notable constraint. Although there is a bus stop 600 metres from the site, there is no footpath to it, and it is likely that most journeys from this location would be by car. Spooner Row Primary School is 1.8 kilometres away on the opposite side of the A11 dual carriageway and there is no easily accessible walking and cycling route. The other nearest services are 3.8 kilometres away in Wymondham.

139. The site's setting amongst flat and open agricultural fields has been assessed to have a significant impact on the surrounding landscape and on nearby estate cottages which are non-designated heritage assets.

140. There are fewer constraints in relation to other assessment criteria including biodiversity, flood risk, market attractiveness, compatibility with neighbouring uses and the availability of utilities connections.

141. The recent planning history provides further useful information when considering VCHAP Site 3 against the assessment criteria. The inspector cited the following justification in refusing appeal (2019/0330) in June 2021:

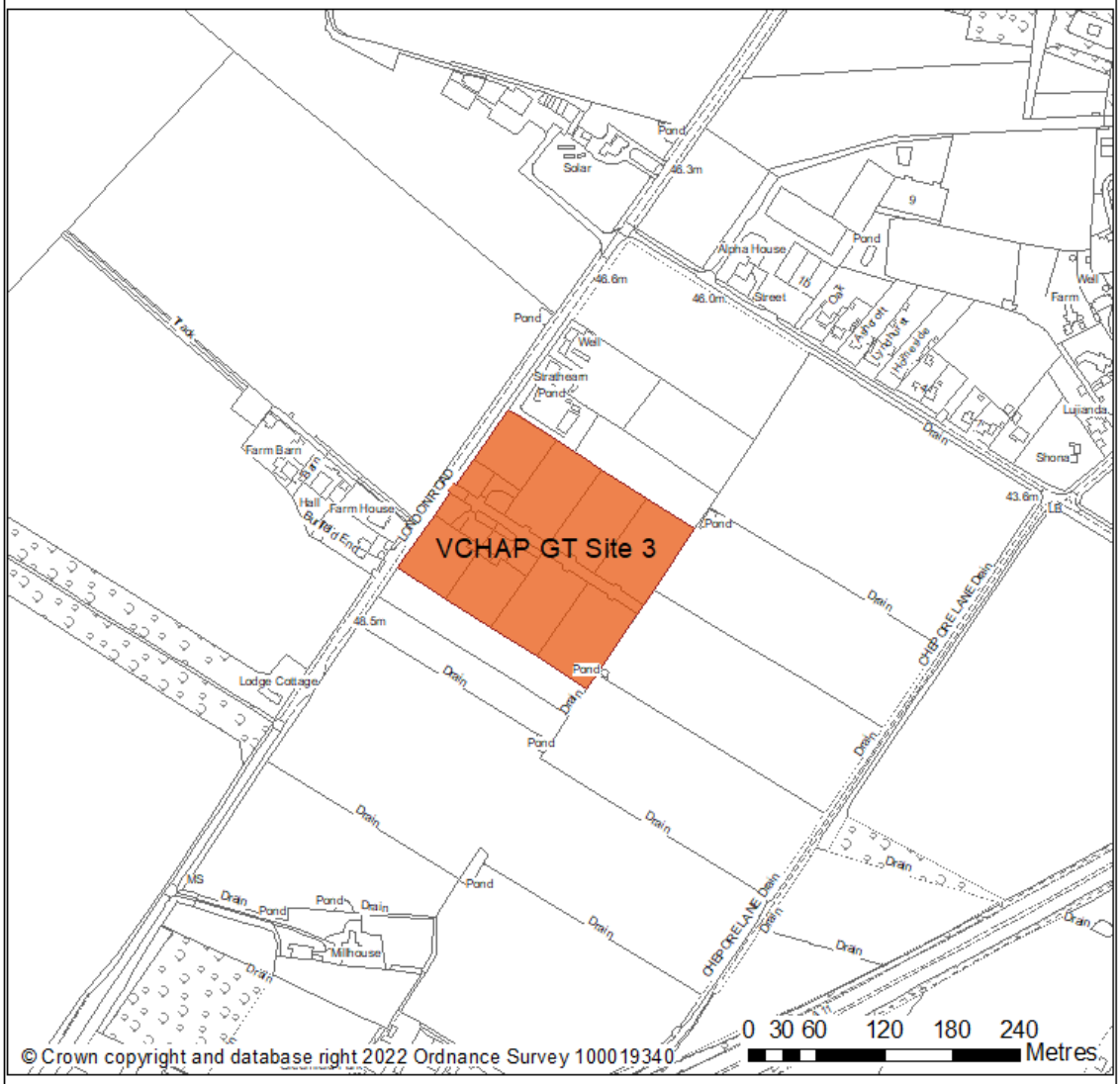
- landscape intrusion,
- impact on the nearby estate cottages,
- journeys would be predominately by car and ,
- the site would amount to a small village in its own right in the context of a sparsely populated community.

142. In summary, there are significant concerns relating to this site as evidenced in a recent appeal decision, most notably relating to accessibility to services, landscape impact and the effect on the nearby non-designated heritage assets. For these reasons VCHAP Site 3 is not considered suitable for allocation.

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

WYMONDHAM

Site Reference: VCHAP GT Site 3
Location: East Side of London Road, Suton, Wymondham
Area: 3.35ha



Gypsy and Traveller Site

Parish Boundary

Scale at A4: 1:5,000

N

Date: 29/11/2022

Conclusions

143. This assessment, along with the SA and HRA, has assisted in identifying a "favoured option" for Gypsy and Traveller accommodation sites to be consulted on. Although all of the favoured sites have some constraints, the limited scale of the development proposed and the specific nature of the constraints means that these can be overcome with appropriate mitigation measures.

144. In some cases, proposed sites do not have immediate access to everyday services. However, the needs of the Gypsy and Traveller community in a predominantly rural area mean that it is not always possible, or necessary, to locate sites with immediate access to facilities.

145. The favoured option provides a variety of sites. There are different types of ownership, both public or private, and both new sites and existing sites for expansion. There is also a relatively wide geographical spread of sites across the area, providing choice, and a range of likely delivery timescales which should meet national policy requirements to ensure evidenced needs are met. This diverse choice of site is the outcome of extensive engagement with various landowners, including direct liaison with the Gypsy and Traveller community.

146. Two of the favoured option sites are new sites put forward by public authorities (GNLP 5005 at Wymondham and GNLP5014 at North Burlingham). Three are new privately owned sites (GNLP5004 at Cawston, GNLP5009 at Bawburgh and GNLP5023 at Wymondham) and five are existing privately owned sites which are proposed for expansion (GNLP5019 Stratton Strawless, GNLP5020 and GNLP5024 at Carleton Rode, GNLP5021 at Horsford, and GNLP5022 at Foulsham).

147. Whilst no sites were identified in the Norwich City Council area in addition to the expansion of the Swanton Road site which has already been accounted for in the calculation of need, there is a distribution and choice of sites across Broadland and South Norfolk. Foulsham, Cawston, Stratton Strawless and Horsford are in the north and west of Broadland, whilst North Burlingham is in the east. In South Norfolk the choice of sites is more clustered in Wymondham and Carleton Rode, with two new sites proposed in the former and two for expansion in the latter.

148. The Greater Norwich partnership recognises there is a current unmet need for pitches and therefore it is important to identify a supply of sites that can deliver over the current 5-year period to March 2027. Expanding existing sites is a good way to build new pitches quickly, and the existing sites at Carleton Rode, Horsford, Foulsham, Stratton Strawless are well-placed to expand over the next 5 years because infrastructure is already in place and the landowners are willing and able to build them out.

149. Some of the newly proposed sites also provide potential for pitches to be built over the current 5-year period. Landowners for the Cawston, Bawburgh, and Wymondham (GNLP5023) sites have stated could deliver

pitches in the current 5-year period. The new site at North Burlingham (GNLP5014), although contingent on the A47 road improvement scheme, can be built on publicly owned land and is also deliverable over the current 5-year period.

150. The reasonable alternative site at Ketteringham and proposed policy change to the submitted contingency housing site at Costessey provide further options.

Sustainability Appraisal of the Greater Norwich Local Plan Gypsy and Traveller Sites and Policies

Addendum to the Regulation 19 SA Report

December 2022

LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the Greater Norwich Local Plan Gypsy and Traveller Sites and Policies

Addendum to the Regulation 19 SA Report

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Filename	LC-806_GNLP_G&T_SA_18_151222LB.docx
Status	Final
Date	December 2022
Author	RI & LB
Reviewed	LB & SS
Approved	ND

Front cover: Happisburgh by John Fielding

About this report & notes for readers

Lepus Consulting Ltd (Lepus) has prepared this report for the use of Greater Norwich Development Partnership. There are a number of limitations that should be borne in mind when considering the conclusions of this report. No party should alter or change this report whatsoever without written permission from Lepus.

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This SA Report is based on the best available information, including that provided to Lepus by the Council and information that is publicly available. No attempt to verify these secondary data sources has been made and they have been assumed to be accurate as published. This report was prepared between April and December 2022 and is subject to and limited by the information available during this time. This report has been produced to assess the sustainability effects of the Gypsy and Traveller Site Allocations and Policies and meets the requirements of the SEA Directive. It is not intended to be a substitute for an Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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Contents

1 Introduction 1
2 Methodology 10
3 Pre-mitigation site assessments 26
4 Assessment of site policies 95
5 Mitigation and residual effects 112
6 Preferred Options 128
7 Next steps 132
Appendix A: SA Framework A1

Figures

Figure 1.1: District boundaries within Greater Norwich and location of reasonable alternative Gypsy and Traveller sites 3
Figure 3.1: Location of proposed Gypsy and Traveller Site GNLP5004 28
Figure 3.2: Location of proposed Gypsy and Traveller Site GNLP5005 33
Figure 3.3: Location of proposed Gypsy and Traveller Site GNLP0581/2043GT 39
Figure 3.5: Location of proposed Gypsy and Traveller Site GNLP5009 45
Figure 3.6: Location of proposed Gypsy and Traveller Site GNLP5013 51
Figure 3.7: Location of proposed Gypsy and Traveller Site GNLP5014 56
Figure 3.8: Location of proposed Gypsy and Traveller Site GNLP5019 61
Figure 3.9: Location of proposed Gypsy and Traveller Site GNLP5020 67
Figure 3.10: Location of proposed Gypsy and Traveller Site GNLP5021 73
Figure 3.11: Location of proposed Gypsy and Traveller Site GNLP5022 78
Figure 3.12: Location of proposed Gypsy and Traveller Site GNLP5023 83
Figure 3.13: Location of proposed Gypsy and Traveller Site GNLP5024 89

Tables

Table 1.1: Timeline of SA documents in relation to the GNLP stages of preparation....6
Table 1.2: Reasonable alternative sites considered within this SA report....8
Table 2.1: Guide to scoring significant effects....11
Table 2.2: Geographic scales of receptors....12
Table 2.3: Impact magnitude....13
Table 2.4: Assumptions for each SA objective....14
Table 3.1: Pre-mitigation impacts of each site identified in the SA Report....27
Table 5.1: Identified adverse impacts and potential mitigation for SA Objective 1 - Air Quality and Noise....113
Table 5.2: Identified adverse impacts and potential mitigation for SA Objective 2 – Climate Change Mitigation and Adaptation....113
Table 5.3: Identified adverse impacts and potential mitigation for SA Objective 3 – Biodiversity, Geodiversity and Green Infrastructure....114
Table 5.4: Identified adverse impacts and potential mitigation for SA Objective 4 - Landscape....115
Table 5.5: Identified adverse impacts and potential mitigation for SA Objective 6 – Population and Communities....116
Table 5.6: Identified adverse impacts and potential mitigation for SA Objective 7 – Deprivation....117
Table 5.7: Identified adverse impacts and potential mitigation for SA Objective 8 – Health....117
Table 5.8: Identified adverse impacts and potential mitigation for SA Objective 9 - Crime....119
Table 5.9: Identified adverse impacts and potential mitigation for SA Objective 10 - Education....119
Table 5.10: Identified adverse impacts and potential mitigation for SA Objective 11 - Economy....121
Table 5.11: Identified adverse impacts and potential mitigation for SA Objective 12 – Transport and Access to Services....122
Table 5.12: Identified adverse impacts and potential mitigation for SA Objective 13 – Historic Environment....123
Table 5.13: Identified adverse impacts and potential mitigation for SA Objective 14 – Natural Resources, Waste and Contaminated Land....124
Table 5.14: Identified adverse impacts and potential mitigation for SA Objective 15 - Water....125
Table 5.15: Post-mitigation impacts of each site identified in the SA Report....126
Table 6.1: Reasons for selection of each reasonable alternative Gypsy and Traveller site....129

Abbreviations

ALC	Agricultural Land Classification
AQMA	Air Quality Management Area
DEFRA	Department for Environment, Food and Rural Affairs
DLUHC	Department for Levelling Up, Housing and Communities
EA	Environment Agency
GNDP	Greater Norwich Development Partnership
GNLP	Greater Norwich Local Plan
GP	General Practice
GTAA	Gypsy and Traveller Accommodation Assessment
ha	Hectare
HRA	Habitats Regulations Assessment
IRZ	Impact Risk Zone
km	Kilometre
LCA	Landscape Character Area
LCT	Landscape Character Type
LVIA	Landscape and Visual Impact Assessment
m	Metre
MHCLG	Ministry for Housing, Communities and Local Government
MSA	Mineral Safeguarding Area
NHS	National Health Service
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
PPG	Planning Policy Guidance
PPP	Plan, Policy and Programme
PRoW	Public Right of Way
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Site of Special Scientific Interest

Executive Summary

About this report

E1 The Greater Norwich Development Partnership (GNDP) are in the process of preparing the Greater Norwich Local Plan (GNLP), which will include allocations and policies to meet the accommodation needs of Gypsies and Travellers.

E2 As part of the GNLP process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of Strategic Environmental Assessment (SEA). The purpose of SA/SEA is to help guide and influence the Plan making process for the GNDP by identifying the likely sustainability effects of various reasonable alternative options.

E3 The Greater Norwich Gypsy and Traveller Accommodation Assessment (GTAA) Report (June 2022)[1] has been prepared to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople within the Plan area, through a review of secondary information, surveys and interviews. The GTAA found that 53 Gypsy and Traveller pitches are required over the Plan period to 2038.

E4 The GNLP was submitted to the Secretary of State for independent examination on 30th July 2021, with examination hearings held between February and March 2022. The Inspectors stated that a focussed consultation on proposed Gypsy and Traveller sites and policies within the GNLP is required. This SA report therefore comprises an appraisal of the 12 reasonable alternative sites and related policies proposed within the GNLP for Gypsies and Travellers within the Plan area.

E5 SA is the process of informing and influencing the preparation of a Local Plan to optimise its sustainability performance. SA considers the social, economic and environmental performance of the Plan.

Summary findings

E6 A total of 12 reasonable alternative sites proposed for permanent Gypsy and Traveller pitches have been identified across Greater Norwich. These sites have been assessed within this SA report, based on the same methodology that has been used throughout the SA process for the assessment of housing, employment and mixed-use sites.

E7 The SA has identified a range of positive and negative potential impacts of the reasonable alternative sites on the objectives within the SA Framework, pre-mitigation. Negative impacts were mainly related to issues associated with the location of development outside of sustainable target distances to services such as schools and healthcare facilities, and the potential for threats or pressures to environmental assets including biodiversity features,

[1] RRR Consultancy Ltd (2022) Greater Norwich Gypsy and Traveller Accommodation Assessment Report, June 2022. Available at: https://www.gnlp.org.uk/sites/gnlp/files/2022-06/Greater%20Norwich%20GTAA%20Final%20Report%20June%202022.pdf [Date accessed: 21/06/22]

watercourses and the loss of ecologically or agriculturally valuable soil associated with development on previously undeveloped land. Positive impacts were identified relating to the provision of pitches to contribute towards meeting accommodation needs for Gypsies and Travellers, and the location of sites away from areas of fluvial flood risk.

E8 Some (but not all) of the identified negative impacts may be mitigated through policy and site design.

E9 The GNDP's preferred sites for allocation within the emerging GNLP 'Site Policies for Gypsy and Traveller Permanent Residential Pitches Focused Consultation' document are Sites GNLP5004, GNLP5005, GNLP5009, GNLP5014, GNLP5019, GNLP5020, GNLP5021, GNLP5022, GNLP5023 and GNLP5024. Site GNLP0581/2043GT is proposed as a contingency site, and GNLP5013 is proposed as a reasonable alternative. Each site has an accompanying site policy which has been prepared to address site-specific issues alongside the proposed allocation.

E10 The 12 reasonable alternative Gypsy and Traveller sites perform similarly overall in the SA. Following consideration of policy mitigation, the SA has identified residual positive, negligible and negative effects against some SA Objectives.

E11 The best performing option could be identified as Site GNLP5013, because after the potential mitigating influence of the GNLP policies is taken into account, no major negative scores are identified, and positive scores are identified overall for seven of the 15 SA Objectives. However, the assessment of this site has also identified the potential for minor negative impacts across five SA Objectives. Site GNLP5005 also performs relatively well, with positive scores for seven SA Objectives but five minor negative scores.

E12 There is a degree of uncertainty regarding effects on biodiversity (SA Objective 3) owing to the emerging mitigation strategy regarding nutrient neutrality issues within Norfolk. Site GNLP5023 wholly coincides with priority habitat, and as such, there is also uncertainty regarding the potential to mitigate the proposed development at this location. Furthermore, at this stage, the impacts that could arise at Site GNLP0581/2043GT are uncertain for some SA Objectives, as the exact location of the Gypsy and Traveller pitches within the wider Costessey Contingency Site are unknown at the time of writing.

E13 Where relevant, the SA has identified some recommendations to enhance or strengthen the proposed site allocation policies.

Next steps

E14 This SA Report has been prepared as an addendum to the Regulation 19 SA Report, and will undergo a 6-week public consultation period between January and March 2023.

E15 This SA Report is undergoing a focused consultation alongside the 'Site Policies for Gypsy and Traveller Permanent Residential Pitches Focused Consultation' document, the Gypsy and Traveller Site Assessment Booklet, HELAA Addendum and the HRA.

E16 Following the consultation period, responses will be considered by the Councils to inform the emerging GNLP as the examination stage progresses.

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1 Introduction

1.1 Context

1.1.1 Lepus Consulting is conducting the Sustainability Appraisal (SA) process for the Greater Norwich Local Plan (GNLP), including Gypsy and Traveller sites and policies, on behalf of Greater Norwich Development Partnership (GNDP) which includes Broadland District Council, Norwich City Council and South Norfolk Council.

1.1.2 The Submission Version of the GNLP was submitted to the Secretary of State for independent examination on 30th July 2021. Between 1st February and 22nd March 2021, the GNDP underwent public consultation on the Regulation 19 Pre-Submission Draft Version of the GNLP[2], with examination hearings held between February and March 2022. This version of the GNLP was supported by a Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) report[3], which satisfied the requirements of an 'Environmental Report' as per the SEA Regulations[4] (from here on referred to as the Regulation 19 SA Report).

1.1.3 SA is the process of informing and influencing the preparation of a Local Plan to maximise sustainability value. SA is integrated with the SEA process so that the requirements of both assessments are prepared simultaneously. The purpose of SA/SEA is to help guide and influence the plan-making process for GNDP by identifying the likely environmental, social and economic effects of various reasonable alternative sites and policies.

1.1.4 This document comprises an Addendum to the Regulation 19 SA Report[5], focusing on the assessment of proposed Gypsy and Traveller sites, which has been prepared in order to address a request made by the Planning Inspectors during the examination.

1.1.5 The GNDP have identified 12 reasonable alternative Gypsy and Traveller sites within South Norfolk and Broadland Districts, with potential pitch delivery ranging from two to 18 pitches per site.

1.1.6 Additionally, the Councils have prepared site policies which seek to facilitate the allocation of the ten preferred Gypsy and Traveller sites and their development management within the emerging GNLP, as follows: Policies GNLP5004, GNLP5005, GNLP5009, GNLP5014, GNLP5019, GNLP5020, GNLP5021, GNLP5022, GNLP5023 and GNLP5024.

[2] GNLP (2021) Regulation 19 Publication Information. Available at: https://www.gnlp.org.uk/regulation-19-publication-part-1-strategy/regulation-19-publication-information-not-part-plan [Date accessed: 06/08/21]

[3] Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (Volumes 1-3) January 2021. Available at: https://www.gnlp.org.uk/regulation-19-publication/evidence-base [Date accessed: 06/08/21]

[4] The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: https://www.legislation.gov.uk/uksi/2004/1633/contents/made [Date accessed: 20/06/22]

[5] Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan. Volume 2 of 3: Regulation 19 SA Report. Available at: https://www.gnlp.org.uk/sites/gnlp/files/2021-01/LC-663_Vol_2of3_GNLP_SA_Reg19_20_250121LB_compressed%20Jan%202021.pdf [Date accessed: 14/04/22]

1.1.7 The Councils have also prepared site policies for two sites which are not preferred at this stage but may come forward in future. The proposed change to Policy GNLP0581/2043 refers to the inclusion of Gypsy and Traveller pitches within the contingency site at Costessey (Site GNLP0581/2043GT), and Policy GNLP5013 is proposed as a reasonable alternative for allocation.

1.1.8 This SA report has appraised the 12 reasonable alternative sites and accompanying site policies in terms of sustainability performance using the SA Framework as set out in **Appendix A**. This will help the GNDP to identify potential mitigation or improvements which could be made to the policies at this stage, in order to help ensure the GNDP have chosen the most sustainable options.

1.2 Greater Norwich

1.2.1 Lepus Consulting has been commissioned by the GNDP to review the GNLP Gypsy and Traveller sites and policies, through the SA process. The GNDP are working with Norfolk County Council and consist of the following:

- Broadland District Council;
- Norwich City Council; and
- South Norfolk District Council.

1.2.2 Greater Norwich comprises the three districts of Norwich, Broadland and South Norfolk (see **Figure 1.1**). The districts of Broadland and South Norfolk are predominantly rural in nature, with isolated towns and villages separated by large areas of open farmland. The Broads National Park, a nationally important landscape, is located to the east of the Greater Norwich Local Plan area. The Broads is a visually and culturally distinctive part of Norfolk. The River Yare, River Bure and River Waveney form the district boundaries between Broadland and South Norfolk.

1.2.3 The city of Norwich is a major regional centre for employment, tourism and culture and is Norfolk's highest-ranking retail centre. Within the district there are numerous primary and secondary educational facilities. Besides schools, there are a number of higher and further education centres, including the University of East Anglia, Norwich University College of the Arts, City College and Easton College.

1.2.4 The GNLP will guide development across the three districts up to 2038, providing both strategic policies and site allocations to meet demand for housing and employment, Gypsy and Traveller pitches, as well as other land use matters. It is being produced by the three councils of Broadland, Norwich and South Norfolk, supported by Norfolk County Council. It takes the adopted Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk, which covers all three districts from 2008 up to 2026, as its starting point.

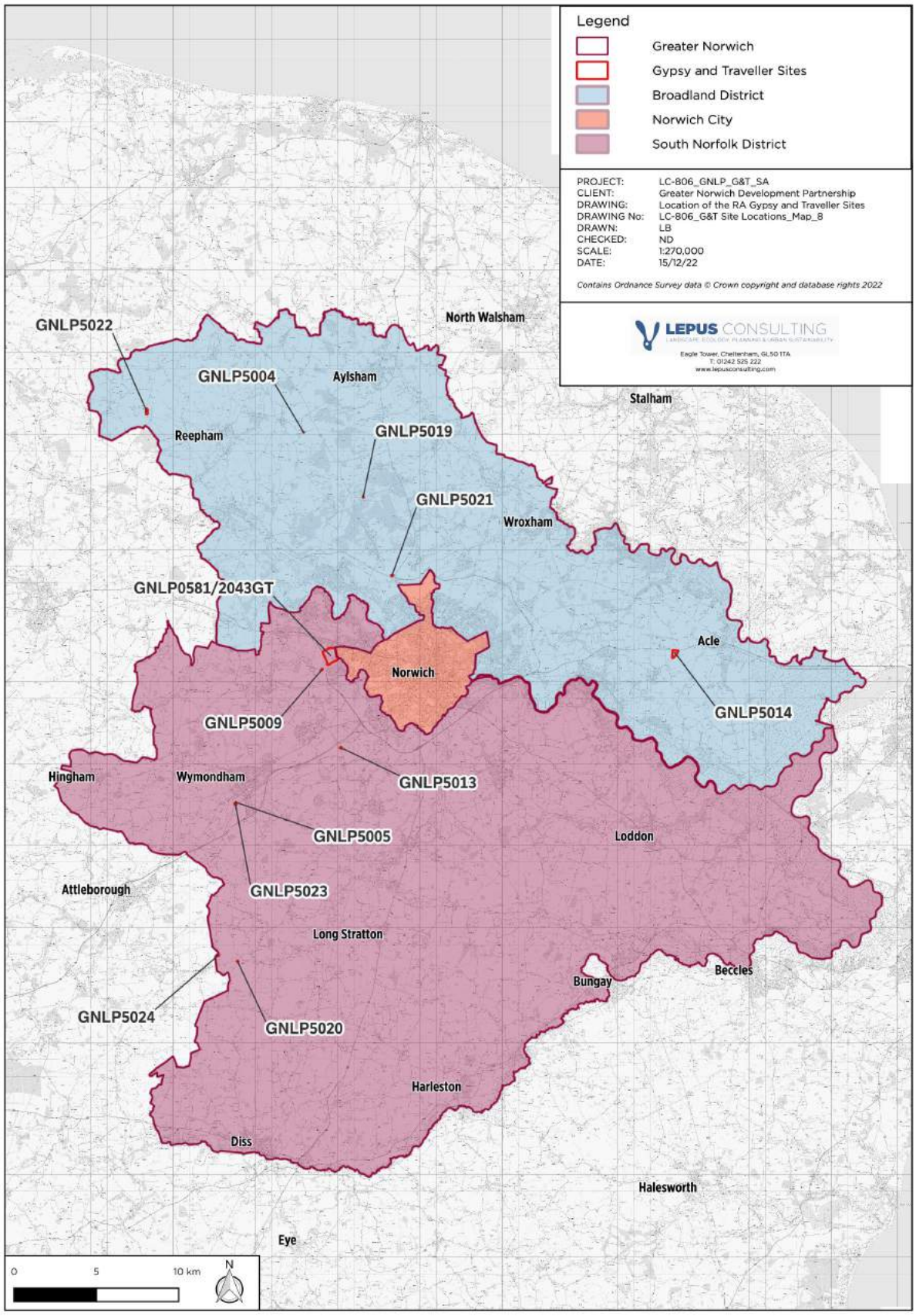


Figure 1.1: *District boundaries within Greater Norwich and location of reasonable alternative Gypsy and Traveller sites*

1.3 Gypsy and Traveller Accommodation Needs Assessment

1.3.1 The Greater Norwich Gypsy and Traveller Accommodation Assessment (GTAA) Report (June 2022)[6] has been prepared to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople within the Plan area, through a review of secondary information, surveys and interviews.

1.3.2 In accordance with planning policy for traveller sites[7], Gypsies and Travellers are defined as *"persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such".*

1.3.3 Travelling Showpeople are defined as *"members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above"*[8].

1.3.4 When taking into account this new evidence alongside recent planning permissions, the GTAA found that 53 Gypsy and Traveller pitches are required by the end of the Plan period in 2038.

1.4 Integrated approach to SA and SEA

1.4.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.

1.4.2 The European Union Directive 2001/42/EC[9] (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types).

1.4.3 The objective of the SEA procedure can be summarised as follows: *"the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development"*.

[6] RRR Consultancy Ltd (2022) Greater Norwich Gypsy and Traveller Accommodation Assessment Report, June 2022. Available at: https://www.gnlp.org.uk/sites/gnlp/files/2022-06/Greater%20Norwich%20GTAA%20Final%20Report%20June%202022.pdf [Date accessed: 21/06/22]

[7] MHCLG (2015) Planning policy for traveller sites. Available at: https://www.gov.uk/government/publications/planning-policy-for-traveller-sites [Date accessed: 22/04/22]

[8] Ibid

[9] Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 (SEA Directive). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN [Date accessed: 22/04/22]

1.4.4 The Directive has been transposed into English law by the SEA Regulations (SI no. 1633). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the GNLP to be subject to SEA throughout its preparation.

1.4.5 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by s19(5) of the planning and Compulsory Purchase Act 2004[10] and should be an appraisal of the economic, social and environmental sustainability of development plans.

1.4.6 The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012[11]. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.

1.5 Best Practice Guidance

1.5.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal process, which incorporates the requirements of the SEA Directive. This can be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment[12];
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive[13];
- Ministry of Housing, Communities and Local Government (2018) National Planning Policy Framework (NPPF)[14];
- Ministry of Housing, Communities and Local Government (2018) Planning Practice Guidance (PPG)[15]; and

[10] Planning and Compulsory Purchase Act 2004. Available at: https://www.legislation.gov.uk/ukpga/2004/5/contents [Date accessed: 22/04/22]

[11] The Town and Country Planning (Local Planning) (England) Regulations 2012. Available at: http://www.legislation.gov.uk/uksi/2012/767/contents/made [Date accessed: 22/04/22]

[12] European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date accessed: 22/04/22]

[13] Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf [Date accessed: 22/04/22]

[14] Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework. Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2 [Date accessed: 22/04/22]

[15] Ministry of Housing, Communities and Local Government (2019) Planning practice guidance. Available at: https://www.gov.uk/government/collections/planning-practice-guidance [Date accessed: 22/04/22]

- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans[16].

1.6 Sustainability Appraisal

1.6.1 The preparation of the GNLP has been supported by a sustainability appraisal process. This document is a component of the SA of the GNLP, comprising the SA of Gypsy and Traveller sites and policies.

1.6.2 SA is the process of informing local development plans to maximise their sustainability value and is a statutory requirement when preparing development plan documents. The SA process provides a soundness test for development plan documents, the key objective of which is to promote sustainable development.

1.6.3 The SA process has followed the Local Plan making process on an iterative basis. Consequently, there are several SA documents that have been prepared. The Regulation 19 SA Report meets the requirements of the SEA Regulations, and all earlier work is clearly referenced in the Regulation 19 SA Report and is available on the GNLP website[17]. **Table 1.1** sets out the iterative timeline of the Local Plan and SA/SEA processes.

Table 1.1: *Timeline of SA documents in relation to the GNLP stages of preparation*

Date	Local Plan Stage	Sustainability Appraisal
March 2017		**SA Scoping Report (GNDP)** Identified the scope for the SA, set out the context, 15 SA Objectives and approach of the assessment.
January to March 2018	**Stage A Regulation 18 Consultation of Site Proposals, Growth Options and the Interim Sustainability Appraisal**	**Interim Sustainability Appraisal (GNDP)** This report assessed the GNLP options for growth, which included six options for the spatial strategy and policy options.
October to December 2018	**Stage B Regulation 18 Site Proposals Addendum and HELAA Addendum**	No SA report prepared.
January to March 2020	**Stage C Regulation 18 Draft Strategy consultation** Draft strategy including vision, objectives and strategic policies, a sites document and supporting evidence documents.	**Regulation 18C SA Report (Lepus)** This report assessed 285 reasonable alternative sites and eleven draft strategic policies.
February to March 2021	**Publication Draft Plan** The GNLP is split into two documents: The Strategy and Site Allocations. The Strategy Document sets out the profile of Greater Norwich, the Plan vision and objectives, and the strategic policies. The Site Allocations Document sets out the site allocations of the GNLP.	**Regulation 19 SA Report (Lepus)** The Regulation 19 SA Report summarised the SA process to date and helped inform the examination stage of the preparation of the GNLP. The Regulation 19 SA presented the findings of the sustainability appraisal of the GNLP, which is composed principally of twelve strategic policies and 138 site policies. This

[16] Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: http://www.rtpi.org.uk/media/2668152/sea-sapracticeadvicefull2018c.pdf [Date accessed: 22/04/22]

[17] Greater Norwich Local Plan. Available at: https://www.gnlp.org.uk/growing-stronger-communities-together [Date accessed: 20/06/22]

Date	Local Plan Stage	Sustainability Appraisal
		report also contained an assessment of an additional 107 reasonable alternative sites.
September 2021		**Consultation response: Addendum to the Regulation 19 SA/SEA Report (Lepus)** The Addendum sought to address consultation responses related to the SA/SEA received by the GNDP during the Regulation 19 consultation, specifically in relation to the testing of reasonable alternatives and selection process for the chosen spatial strategy and distribution of growth in the Plan area.
December 2021		**Inspectors' Initial Questions: Reasonable Alternatives for Housing Number Options. Addendum to the Regulation 19 SA/SEA Report (Lepus)** Prepared in response to the Inspectors' Initial Question 7 which asked for an addendum to the SA to be produced, relating to the housing growth numbers, and addressing "*both smaller and minimal supply buffers as 'reasonable alternatives'*".
June 2022		**Note in response to Inspectors' questions relating to the Sustainability Appraisal of potential development Sites (Lepus)** An SA note has been prepared to address site specific issues raised in representations made in writing or in person at the EiP Part 1 Hearings.
January to March 2023	**Site Policies for Gypsy and Traveller Permanent Residential Pitches Focused Consultation** The consultation document sets out possible sites to provide residential pitches for Gypsies and Travellers.	**SA of the GNLP Gypsy and Traveller Sites and Policies: Addendum to the Regulation 19 SA/SEA Report (Lepus)** This SA Addendum presents the assessment of 12 reasonable alternative Gypsy and Traveller sites and accompanying site allocation policies.

1.7 GNLP Gypsy and Traveller Sites and Policies

1.7.1 The GNDP have identified 12 reasonable alternative Gypsy and Traveller sites, listed in **Table 1.2**.

Table 1.2: *Reasonable alternative sites considered within this SA report*

Site Reference	Site Name	Gypsy and Traveller Site Area (ha)	Total Site Area (ha)	Proposed No. of Pitches
GNLP5004	Land off Buxton Road, Eastgate	0.12	0.12	4
GNLP5005	Wymondham Recycling Centre, Strayground Lane	0.07	0.07	2
GNLP0581/2043GT	Land off Bawburgh Lane, north of New Road and east of the A47, Costessey (Contingency Site)	1.00	62.33	18
GNLP5009	Hockering Lane	0.59	0.59	6
GNLP5013	Ketteringham Recycling Centre (revised area)	0.70	0.70	10
GNLP5014	Land adjacent to A47	1.00	11.09	15
GNLP5019	Land at Woodland Stable, Shortthorn Road, Stratton Strawless	0.33	0.33	4
GNLP5020	Land at Romany Meadow, The Turnpike, Carleton Rode	0.54	0.54	6
GNLP5021	The Old Produce Shop, Holt Road, Horsford	0.90	0.90	6
GNLP5022	The Oaks, Foulsham	3.19	3.19	5
GNLP5023	Strayground Lane, Wymondham	1.19	1.19	10
GNLP5024	Upgate Street, Carleton Rode	0.62	0.62	4

1.7.2 10 reasonable alternative sites are preferred for allocation within the GNLP: GNLP5004, GNLP5005, GNLP5009, GNLP5014, GNLP5019, GNLP5020, GNLP5021, GNLP5022, GNLP5023 and GNLP5024. Site GNLP0581/2043GT is allocated as a contingency site, and GNLP5013 as a reasonable alternative. Site policies have been prepared by the Councils which set out requirements for the development proposals relating to each site. These site-specific policies have been assessed within **Chapter 4** of this report.

1.8 Signposting for this report

1.8.1 **Chapter 2** of this report sets out the methodology used to present and assess the findings of the SA process.

1.8.2 **Chapter 3** of this report presents the findings of the appraisal of the 12 reasonable alternative Gypsy and Traveller sites, pre-mitigation.

1.8.3 **Chapter 4** of this report presents the assessment of the 12 Gypsy and Traveller site policies.

1.8.4 **Chapter 5** of this report outlines the potential mitigating influence of GNLP policies and post-mitigation assessment of the reasonable alternative Gypsy and Traveller sites.

1.8.5 **Chapter 6** sets out the site identification process that has been undertaken and the reasons for rejection and selection of each reasonable alternative site.

1.8.6 **Chapter 7** outlines the next steps of the SA process.

2 Methodology

2.1 Assessment of Reasonable Alternatives

2.1.1 The purpose of this document is to provide an appraisal of the GNLP development proposals and policies prepared by GNDP in line with the SEA Regulations.

2.1.2 Regulation 12 of the SEA Regulations[18] states that the Environmental Report "*shall identify, describe and evaluate the likely significant effects of the environment of – (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme*".

2.1.3 Each of the sites and policies appraised in this report has been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework is presented in its entirety in **Appendix A**.

2.1.4 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations[19]. Including the SEA topics in the SA Objectives helps ensure that all environmental criteria of the SEA Regulations are represented. Consequently, the SA Objectives reflect all subject areas to ensure the assessment process is transparent, robust and thorough.

2.1.5 It is important to note that the order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to focus each objective, decision-making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.

2.1.6 A single value from **Table 2.1** is allocated to each SA Objective for each site and policy. Justification for the score is presented in an accompanying narrative assessment text. The assessment of a significant effect is in accordance with the SEA Regulations which states that, where feasible, effects considered should include *"short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects".*

[18] The Environmental Assessment of Plans and Programmes Regulations 2004. Regulation 12. Available at: https://www.legislation.gov.uk/uksi/2004/1633/regulation/12/made [Date accessed: 16/05/22]

[19] Biodiversity flora and fauna; Population; Human health; Soil; Water; Air; Climatic factors; Material assets; Cultural heritage (including architectural and archaeological heritage); and Landscape.

Table 2.1: Guide to scoring significant effects

Significance	Definition (not necessarily exhaustive)
Major Negative --	The size, nature and location of a reasonable alternative would be likely to: • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	The size, nature and location of a reasonable alternative would be likely to: • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse.
Minor Positive +	The size, nature and location of a reasonable alternative would be likely to: • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	The size, nature and location of a reasonable alternative would be likely to: • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

2.1.7 When selecting a single value to best represent the environmental performance of the relevant SA Objective, the precautionary principle is used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SA Framework (see the second column of the SA Framework in **Appendix A**) and a negative effect is identified in relation to another criterion within the same SA Objective, the overall score will be negative for that objective.

2.1.8 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without detrimental effects on known receptors (identified in the baseline).

2.2 Significance

2.2.1 Where an environmental impact has been identified, the significance of effect has been categorised as minor or major. **Table 2.1** lists the significance matrix and explains the terms used. The nature of the significant effect can be either beneficial or adverse depending on the type of development and the design and mitigation measures proposed.

2.2.2 Each reasonable alternative site that has been identified in this report has been assessed for its likely significant effect against each SA Objective in the Framework, as per **Table 2.1**. Scores are not intended to be summed.

2.2.3 It is important to note that the scores are high level indicators. The narrative assessment text which details the key decision-making criteria behind each awarded score should always read alongside the score. Assumptions and limitations in **Table 2.4** and **section 2.7** offer further insight into how each score was arrived at.

2.2.4 Significance of effect is a combination of impact sensitivity and magnitude.

2.3 Impact sensitivity

2.3.1 Impact sensitivity is measured through consideration as to how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability of the area, whether or not environmental quality standards will be exceeded, and if impacts will affect designated areas or landscapes.

2.3.2 A guide to the range of scales used in the impact significance matrix is presented in **Table 2.2.** For most receptors, sensitivity increases with geographic scale.

Table 2.2: *Geographic scales of receptors*

Scale	Typical criteria
International/ national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

2.4 Impact magnitude

2.4.1 Impact magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude is determined based on the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 2.3**).

Table 2.3: Impact magnitude

Impact magnitude	Typical criteria
High	Likely total loss of or major alteration to the receptor in question; • Provision of a new receptor/feature; or • The impact is permanent and frequent.
Medium	Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: • Frequent and short-term; • Frequent and reversible; • Long-term (and frequent) and reversible; • Long-term and occasional; or • Permanent and occasional.
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: • Reversible and short-term; • Reversible and occasional; or • Short-term and occasional.

2.5 Distances

2.5.1 Where distances have been measured, these are 'as the crow flies' from the furthest edge of the site unless specified otherwise. Site end users require access to a range of facilities and amenities. Some distances that are considered to be sustainable in this regard are based on Barton, Grant and Guise (2010) Shaping Neighbourhoods for Local Health and Global Sustainability[20].

2.6 Limitations of predicting effects

2.6.1 SA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates professional judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.

2.6.2 The assessments in this report are based on the best available information, including that provided to us by GNDP and information that is publicly available. The assessment of reasonable alternatives is somewhat limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available. Every attempt has been made to predict effects as accurately as possible.

[20] Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010.

2.6.3 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all reasonable alternatives must be assessed in the same way.

2.7 Assessment assumptions

2.7.1 A number of assumptions are inherent to the appraisal process for specific SA Objectives (see **Table 2.4**). These should be borne in mind when considering the assessment findings.

Table 2.4: *Assumptions for each SA objective.*

SA Objective	Assessment Assumptions/Methodology
1. Air Quality and Noise: Minimise air, noise and light pollution to improve wellbeing.	Exposure of new residents to air pollution has been considered in the context of development proposal location in relation to established Air Quality Management Areas (AQMAs) and main roads. It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution i.e. the road carriageway. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, "*beyond 200m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant*"[21]. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers[22 23]. The proximity of a development proposal in relation to a main road (defined as a motorway or A-road) determines the exposure level of site end users to road related air and noise emissions[24]. In line with the DMRB guidance, it is assumed that site end users would be most vulnerable to these impacts within 200m of a main road. This distance has therefore been applied throughout this assessment to both existing road and rail sources. Development proposals located within 200m of a main road would be expected to have a minor negative impact on local residents' exposure to air and noise pollution. Development proposals located over 200m from a main road would be expected to have a negligible impact on local residents' exposure to air and noise pollution. Development proposals located within 200m of a railway line would be expected to have a minor negative impact on local residents' exposure to noise pollution and vibrations. Development proposals located over 200m from a railway line would be expected to have a negligible impact on local residents' exposure to noise pollution and vibrations. Due to the extent and nature of the development (Gypsy & Traveller pitches) it is assumed that development proposals would have a negligible impact on the generation of air pollution in the Plan area.

[21] Department for Transport (2022) TAG unit A3 Environmental Impact Appraisal. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 22/06/22]

[22] Bignal, K., Ashmore, M & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

[23] Ricardo-AEA (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.

[24] Design Manual for Roads and Bridges (2019) Sustainability & Environment Appraisal: LA 105 Air quality. Available at: https://www.standardsforhighways.co.uk/dmrb/search/10191621-07df-44a3-892e-c1d5c7a28d90 [Date accessed: 22/06/22]

SA Objective	Assessment Assumptions/Methodology
2. Climate Change Mitigation and Adaptation: Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change.	**Carbon Emissions** At this stage, the nature and design of Gypsy and Traveller pitches which could be developed at each site is unknown. Therefore, increases in greenhouse gas (GHG) emissions as a result of the construction and occupation of dwellings is unknown. Due to the extent and nature of the development (pitches for Gypsies & Travellers) it is assumed that development proposals would have a negligible impact on Greater Norwich's contributions to climate change. **Fluvial Flooding** The level of fluvial flood risk present across the Plan area is based on the Environment Agency's flood risk data[25], such that: • Flood Zone 3: 1%+ chance of flooding each year; • Flood Zone 2: 0.1% - 1% chance of flooding each year; and • Flood Zone 1: Less than 0.1% chance of flooding each year. It is assumed that development proposals will be in perpetuity and it is therefore likely that development will be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of fluvial flooding. Where development proposals coincide with Flood Zone 2, a minor negative impact would be expected. Where development proposals coincide with Flood Zone 3 (either Flood Zone 3a or 3b), a major negative impact would be expected. Where development proposals are located within Flood Zone 1, a minor positive impact would be expected for climate change adaptation. **Surface Water Flooding** Areas determined to be at high risk of surface water (pluvial) flooding have more than a 3.3% chance of flooding each year, medium risk between 1% and 3.3%, and low risk between 0.1% and 1% chance. Development proposals located in areas at low and medium risk of surface water flooding would be expected to have a minor negative impact on surface water flooding. Development proposals located within areas at high risk of surface water flooding would be expected to have a major negative impact on surface water flooding. Where development proposals are not located in areas determined to be at risk of surface water flooding, a negligible impact would be expected for climate change adaptation. It is assumed that development proposals will be in perpetuity, and it is therefore likely that development would be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of surface water flooding.
3. Biodiversity, Geodiversity and Green Infrastructure: Protect and enhance the area's biodiversity and geodiversity assets	Where a development proposal is coincident with, adjacent to or located in proximity to an ecological or geological receptor, it is assumed that negative effects associated with development will arise to some extent. These negative effects include those that occur during the construction phase and are associated with the construction process and construction vehicles (e.g. habitat loss, habitat fragmentation, habitat degradation, noise, air, water and light pollution) and those that are associated with the operation/occupation phases of development (e.g. public access associated disturbances, increases in local congestion resulting in a reduction in air quality, changes in noise levels, visual disturbance, light pollution, impacts on water levels and quality etc.).

[25] Environment Agency (2013) Flood Map for Planning Risk. Available at: http://apps.environment-agency.gov.uk/wiyby/cy/151263.aspx [Date accessed: 22/06/22]

SA Objective	Assessment Assumptions/Methodology
and expand the provision of green infrastructure.	Negative impacts would be expected where the ecological or geological designations listed above may be harmed or lost as a result of proposals. The assessment is largely based on a consideration of the proximity of a site and the attributes and qualities of the receptor in question. For the purposes of this assessment, impacts on priority habitats protected under the 2006 NERC Act[26] have been considered in the context of Natural England's publicly available Priority Habitat Inventory database[27]. It is acknowledged this may not reflect current local site conditions in all instances. It is assumed that construction and occupation of previously undeveloped greenfield land would result in a net reduction in vegetation cover and Green Infrastructure in the Plan area. Development proposals which would be likely to result in the loss of greenfield land are therefore expected to contribute towards a cumulative loss in vegetation cover. This would also be expected to lead to greater levels of fragmentation and isolation across the wider ecological network, such as the loss of habitat stepping-stones and corridors. This can restrict the ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land is considered under the Natural Resources objective (SA Objective 14) in this assessment. It should be noted that no detailed ecological surveys have been completed by Lepus to inform the assessments made in this report. Protected species survey information is not generally available for the sites within the Plan area. It is acknowledged that data is available from the local biological records centre. However, it is noted that this data may be under-recorded in certain areas. This under-recording does not imply species absence. As a consequence, consideration of this data on a site-by-site basis within this assessment would have the potential to skew results – favouring well recorded areas of the Plan area. As such, it has not been possible to assess impacts on protected species in a fair and consistent basis at the site level using primary survey data. It is anticipated that the GNDP will require detailed ecological surveys and assessments to accompany future planning applications. Such surveys will determine on a site-by-site basis the presence of Priority Species and Priority Habitats protected under the NERC Act. It is assumed that the loss of biodiversity assets, such as ancient woodland or an area of priority habitat, are permanent effects. It is assumed that mature trees and hedgerows will be retained where possible. Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country. IRZs are a Geographical Information System (GIS) tool which allow a rapid initial assessment of the potential risks posed by development proposals to: SSSIs, SACs, SPAs and Ramsar sites. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts[28]. It should be noted that IRZ

[26] Natural Environment and Rural Communities Act 2006. Available at: http://www.legislation.gov.uk/ukpga/2006/16/contents [Date accessed: 22/06/22]

[27] Natural England (2021) Priority Habitat Inventory (England). Available at: https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england [Date accessed: 22/06/22]

[28] Natural England (2022) Natural England's Impact Risk Zones for Sites of Special Scientific Interest, 08 June 2022. Available at: https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/sssi-impact-risk-zones [Date accessed: 22/06/22]

SA Objective	Assessment Assumptions/Methodology
	classifications are regularly updated by Natural England, and although were correct at the time of writing, may have since been amended. Where development proposals coincide with a Habitats site, a SSSI, NNR, LNR, CWS, CGS or ancient woodland, or are adjacent to a Habitats site, SSSI or NNR, it is assumed that development would have a permanent impact on these nationally important biodiversity and geodiversity assets, and a major negative impact would be expected. Where development proposals coincide with priority habitats, are adjacent to an ancient woodland, LNR, CWS or CGS, are located within a SSSI IRZ which states to "*consult Natural England*" or are located in close proximity to a Habitats site, SSSI, NNR, LNR or stand of ancient woodland, it is assumed that development would have an impact on these biodiversity and geodiversity assets, and a minor negative impact would be expected. There are numerous Habitats sites located within and in close proximity to the Plan area and various Zones of Influence, primarily relating to nutrient impacts, coincide with the Gypsy and Traveller sites. Advice relating to nutrient neutrality issues has been published in March 2022 by Natural England[29] and DLUHC[30], which affects a large proportion of the GNLP area, for which a mitigation strategy is currently being developed. The emerging HRA[31] has assessed the potential effects of the Gypsy and Traveller sites in further detail. Where a development proposal would not be anticipated to impact a biodiversity or geodiversity asset, a negligible impact would be expected for this objective.
4. Landscape: Promote efficient use of land, while respecting the variety of landscape types in the area.	Impacts on landscape will be largely determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances. Detailed proposals for each development are uncertain at this stage of the assessment. Furthermore, this assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. However, there is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question. Where a development proposal would not be anticipated to impact a local or designated landscape, a negligible impact would be expected for this objective. **The Norfolk Coast and Suffolk Coast and Heaths AONBs:** The Suffolk Coast and Heaths AONB is located, at its closest point, approximately 3km south east of the Greater Norwich boundary. Parts of the Norfolk Coast AONB are located approximately 8km to the north and east of Greater Norwich. It is not anticipated that the

[29] Letter from Natural England to LPA Chief Executives & Heads of Planning, County Council Chief Executives and Heads of Planning, EA Area and National Team Directors, Planning Inspectorate, Natural Resources Wales (Cross border sites only) & Secretary of State for Department for Levelling Up Housing & Communities (DLUHC). Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitats sites. 16 March 2022.

[30] Letter from DLUHC to Chief Planning Officers and Local Planning Authorities affected by nutrient pollution. NUTRIENT POLLUTION: NEUTRALITY, SUPPORT AND FUNDING. 16 March 2022. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1061531/Chief_Planner_Letter_about_nutrient_pollution___March_2022.pdf [Date accessed: 17/06/22]

[31] The Landscape Partnership (2022) Habitats Regulations Assessment of published Proposed Submission Greater Norwich Local Plan – Gypsy and Traveller sites Addendum for Greater Norwich Development Partnership, June 2022.

SA Objective	Assessment Assumptions/Methodology
	proposed development of Gypsy and Traveller Sites at any of the identified sites would impact either of these AONBs, and as such, they have not been considered further in this report. **Discordant with LCA:** Baseline data on Landscape Character Areas (LCAs) within the Plan area are derived from the Broadland Character Assessment Supplementary Planning Document (SPD)[32] and South Norfolk Landscape Character Assessment[33]. Key characteristics of each LCA have informed the appraisal of each development proposal against the landscape objective. Given that the detailed nature of the landscape in relation to each development proposal is unknown, the assessment of impact is based on the overall landscape character guidelines and key characteristics. Development proposals which are considered to be potentially discordant with the guidelines and characteristics provided in the published landscape character assessment would be expected to have a minor negative impact on the landscape objective. **The Broads National Park:** The Broads is an area covering approximately 303km^2 of low-lying wetland with National Park status. It is located to the east of Greater Norwich and follows the River Yare into Norwich City. None of the proposed Gypsy and Traveller sites are located within, or within close proximity to, the Broads and as such a negligible impact would be anticipated at all sites. **Views:** Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the Public Rights of Way (PRoW) network and/ or local residents would be expected to have minor negative impacts on the landscape objective. Potential views from residential properties are identified through reference to aerial mapping and the use of Google Maps[34]. It is anticipated that the GNDP will require developers to undertake Landscape and Visual Impact Assessments (LVIAs) to accompany any future proposals, where relevant. The LVIAs should seek to provide greater detail in relation to the landscape character of the development proposals and its surroundings, the views available towards the development, the character of those views and the sensitivity and value of the relevant landscape and visual receptors. **Urbanisation of the Countryside:** Development proposals which are considered to increase the risk of future development spreading further into the wider landscape would be expected to have a minor negative impact on the landscape objective.
5. Housing: Ensure that everyone has	It is assumed that there will be no net loss of existing lawful Gypsy and Traveller pitches.

[32] Broadland District Council (2013) Landscape Character Assessment Supplementary Planning Document (SPD). Available at: https://www.broadland.gov.uk/downloads/download/167/landscape_character_assessment_supplementary_planning_document_spd [Date accessed: 22/06/22]

[33] Land Use Consultants (2001) South Norfolk Landscape Assessment. Available at: https://www.south-norfolk.gov.uk/residents/planning/planning-policy/landscape-character-assessments [Date accessed: 22/06/22]

[34] Google Maps (2022). Available at: https://www.google.co.uk/maps [Date accessed: 22/06/22]

SA Objective	Assessment Assumptions/Methodology
good quality housing of the right size and tenure to meet their needs.	Sites put forward for the development of additional pitches for Gypsies and Travellers are expected to make a minor positive contribution to fulfilling the identified accommodation needs.
6. Population and Communities: Maintain and improve the quality of life of residents.	**Local Services:** In accordance with Barton et al.'s sustainable distances[35], proposed development which is located within 600m of a local service, such as a post office or a convenience store, would be expected to provide site end users with access to essential services. Development proposals located within this target distance would be expected to have a minor positive impact on this objective. Development proposals located outside this target distance would be expected to have a minor negative impact on this objective. **Local Landscape Designations:** The local landscape designations dataset has been provided by the GNDP. This includes areas of multi-functional green infrastructure and community buildings such as playing fields, allotments and other communal spaces which would be expected to help improve the quality of life for local residents. Development proposals which would situate site end users within 600m of a local landscape designation would be likely to have a minor positive impact on this objective. **Overall:** Development proposals which would locate site end users within 600m of both an open greenspace and a local landscape designation would be expected to have a major positive impact for this objective.
7. Deprivation: To reduce deprivation.	The purpose of this objective is to help redress deprivation issues across the Plan area. None of the site proposals assessed in this report will be expected to redress these issues. At this stage, it is assumed that development proposals at all of the reasonable alternative sites would have a negligible impact for this objective.
8. Health: To promote access to health facilities and promote healthy lifestyles.	**Green Network:** Development proposals have been assessed in terms of their access to the local PRoW networks and public greenspace. In line with Barton et al.[36], a sustainable distance of 600m has been used for the assessments. Development proposals that are located within 600m of a PRoW/public greenspace would be expected to have a minor positive impact on residents' access to a diverse range of natural habitats. Development proposals located over 600m from a PRoW/public greenspace could potentially have a minor negative impact on residents' access to natural habitats, and therefore have an adverse impact on the physical and mental health of local residents. **Air Quality:** It is assumed that development proposals located in close proximity to main roads would expose site end users to transport associated noise and air pollution. In line with the DMRB guidance, it is assumed that receptors would be most vulnerable to these impacts

[35] Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability.

[36] Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability.

SA Objective	Assessment Assumptions/Methodology
	located within 200m of a main road[37]. Negative impacts on the long-term health of residents would be anticipated where residents would be exposed to air pollution. Development proposals located within 200m of a main road would be expected to have a minor negative impact on local residents' exposure to air pollution. Development proposals located over 200m from a main road would be expected to have a minor positive impact on local residents' exposure to air pollution. Air Quality Management Areas (AQMAs) are considered to be an area where the national air quality objective will not be met. No proposed Gypsy and Traveller sites are located within, or within 200m of, an AQMA. **Health Facilities:** In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the GNDP should seek to ensure that residents have access to NHS hospitals, GP surgeries, leisure centres and a diverse range of accessible natural habitats and the surrounding PRoW network. Sustainable distances to each of these necessary services are derived from Barton et al.[38]. Adverse impacts are anticipated where the proposed development would not be expected to facilitate active and healthy lifestyles for current or future residents. For the purposes of this assessment, accessibility to a hospital has been taken as proximity to an NHS hospital with an A&E service. Distances of development proposals to other NHS facilities (e.g. community hospitals and treatment centres) or private hospitals has not been taken into consideration in this assessment. The two NHS hospitals with an A&E department in close proximity Greater Norwich are Norfolk and Norwich University Hospital and James Paget University Hospital. Development proposals located within 5km of one of these hospitals would be expected to have a minor positive impact on the access of site end users to emergency health services. Development proposals located over 5km from one of these hospitals would be likely to have a minor negative impact on the access of site end users to emergency health care. There are numerous GP surgeries located across the Plan area. Development proposals located within 800m of a GP surgery would be expected to have a minor positive impact on the access of site end users to this essential health service. Development proposals located over 800m from a GP surgery would be likely to have a minor negative impact on the access of site end users to essential health care. Access to leisure centres can provide local residents with opportunities to facilitate healthy lifestyles through exercise. Development proposals located within 1.5km of a leisure centre would be expected to have a minor positive impact on the access of site end users to these facilities. Development proposal located over 1.5km from a leisure centre would be likely to have a minor negative impact on the access of site end users to these facilities. **Overall:** Development proposals which would locate site end users in close proximity to one of the listed NHS hospitals, a GP surgery and a leisure centre would be expected to have a major positive impact for this objective.

[37] Design Manual for Roads and Bridges (2019) Sustainability & Environment Appraisal: LA 105 Air quality. Available at: https://www.standardsforhighways.co.uk/dmrb/search/10191621-07df-44a3-892e-c1d5c7a28d90 [Date accessed: 22/04/22]

[38] Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

SA Objective	Assessment Assumptions/Methodology
	Development proposals which would locate site end users away from the listed NHS hospitals, a GP surgery and a leisure centre would be expected to have a major negative impact for this objective.
9. Crime: To reduce crime and the fear of crime.	The purpose of this objective is to help reduce crime rates in the local area. It is not possible to assess the impacts of residential site proposals on local crime prevention or crime rates. At this stage, it is assumed that development proposals at all reasonable alternative sites would have a negligible impact for this objective.
10. Education: To improve skills and education.	It is assumed that new residents in the Plan area require access to primary and secondary education services to help facilitate good levels of education, skills and qualifications of residents. In line with Barton et al.'s sustainable distances[39], for the purpose of this assessment, 800m is assumed to be the target distance for travelling to a primary school and 1.5km to secondary schools. All schools identified are publicly accessible state schools. It is recognised that not all schools within Greater Norwich are accessible to all pupils. For instance, independent and academically selective schools may not be accessible to all. Local primary schools may only be Infant or Junior schools and therefore not provide education for all children of primary school age. Some secondary schools may only be for girls or boys and therefore would not provide education for all. This has been considered within the assessment. At this stage, there is not sufficient information available to be able to accurately predict the effect of new development on the capacity of local schools, or to incorporate local education attainment rates into the assessment. Development proposals which would locate site end users within the target distances of a primary school or secondary school would be expected to have a minor positive impact for this objective. Development proposals which would locate site end users outside of the target distances of a primary or secondary school would be expected to have a minor negative impact for this objective. Development proposals which would locate new residents within the target distance to both a primary and secondary school would be expected to have a major positive impact on the education objective. Development proposals which would locate new residents outside of the target distance to both a primary and secondary school would be likely to have a major negative impact on the education objective.
11. Economy: Encourage economic development covering a range of sectors and skill levels to improve employment	**Employment Opportunities:** It is assumed that, in line with Barton et al.'s sustainable distances[40], new residents should be situated within 5km of key employment areas to ensure they have access to a range of employment opportunities capable of meeting their needs. Key employment areas are defined as locations which would provide a range of employment opportunities from a variety of employment sectors, including retail parks, industrial estates and major local employers. No further study has been undertaken to identify all employment areas. Development proposals which would locate site end users within the target distances of a key employment area would be expected to have a minor positive impact for this

[39] Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010.

[40] Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

SA Objective	Assessment Assumptions/Methodology
opportunities for residents and maintain and enhance town centres.	objective. Development proposals which would locate site end users outside the target distances to a key employment area would be expected to have a minor negative impact for this objective. **Employment Floorspace:** An assessment of current land use at all sites has been made through reference to aerial mapping and the use of Google Maps[41]. Development proposals which could result in a net decrease in employment floorspace would be expected to have a negative impact on the local economy.
12. Transport and Access to Services: Reduce the need to travel and promote the use of sustainable transport modes.	**Public Transport:** In line with Barton et al.'s sustainable distances, site end users should be situated within 2km of a railway station and 400m of a bus stop offering a frequent service. Bus service frequency and destination information was obtained from Google Maps[42] [43]. In order for a positive impact to be anticipated with regard to access to public transport, consideration has been given to the proportion of a development proposal within the target distance of these key transport services. To be sustainable, the bus stop should provide users with hourly services. Development proposals located within the target distance to a railway station or bus stop would be expected to have a minor positive impact on local transport and accessibility. Development proposals located outside of the target distance to a railway station or a bus stop would be expected to have a minor negative impact on transport and accessibility. **Pedestrian Access:** Development proposals have been assessed in terms of their access to the surrounding footpath network. In order for a positive impact to be anticipated with regard to pedestrian access, consideration has been given to safe access to and from the development e.g. footpath. Safe access is determined to be that which is suitable for wheelchair users and pushchairs. Development proposals which would be expected to provide site end users with adequate access to the surrounding footpath network would be expected to have a minor positive impact on pedestrian access. Development proposals which would not be anticipated to provide adequate access would be expected to result in a minor negative impact on pedestrian access. **Road Access:** Development proposals have been assessed in terms of their access to the surrounding road network. Development proposals which would be likely to provide site end users with adequate access to the surrounding road network would be expected to have a minor positive impact on road access. Development proposals which would not be anticipated to provide adequate access would be expected to have a minor negative impact on road access. **Overall:** Development proposals which would locate site end users in close proximity to all the above receptors would be expected to have a major positive impact for this objective.

[41] Google Maps (2022). Available at: https://www.google.co.uk/maps [Date accessed: 14/04/22]

[42] Ibid

[43] Live departure boards available from Google Maps have been used to assess the frequency of services at bus stops within the Plan area. These are obtained from local bus timetables.

SA Objective	Assessment Assumptions/Methodology
	Development proposals which would locate site end users away from all the above receptors would be expected to have a major negative impact for this objective.
13. Historic Environment: Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment.	Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. There is a risk of adverse effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a site is in close proximity to heritage assets. Adverse impacts are recorded for options which have the potential to have an adverse impact on sensitive heritage designations, including Listed Buildings, Scheduled Monuments (SM), Registered Parks and Gardens (RPG), and Conservation Areas. It is assumed that where a designated heritage asset coincides with a site proposal, the heritage asset will not be lost as a result of development (unless otherwise specified by the GNDP). Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset. **Setting:** Development which could potentially be discordant with the local character or setting, for example, due to design, layout, scale or type, would be expected to adversely impact the setting of nearby heritage assets that are important components of the local area. Views of, or from, the heritage asset are considered as part of the assessment of potential impacts on the setting of the asset. **Designated Features:** No proposed Gypsy and Traveller sites coincide with a designated heritage asset. Where the development proposal lies adjacent to, or in close proximity to, a Listed Building, Conservation Area, SM, or RPG, an adverse impact on the setting of the asset would be likely, to some extent, and a minor negative impact may therefore be expected. Where development proposals are not located in close proximity to any heritage asset, or the nature of development is determined not to affect the setting or character of the nearby heritage asset, a negligible impact would be expected for this objective. It is anticipated that the GNDP will require a Heritage Statement to be prepared to accompany future planning applications, where appropriate. The Heritage Statement should describe the significance of any heritage assets affected by the proposals, including any contribution made by their settings. It is assumed that desk-based assessments will be required on a site-by-site basis for planning proposals which could potentially impact archaeological features. At this stage of the Plan preparation process there is no data available to indicate areas of archaeological potential within Greater Norwich, and as such no assessment has been carried out with regard to archaeology at present.
14. Natural Resources, Waste and Contaminated Land: Minimise waste generation,	**Previously Developed Land:** In accordance with the core planning principles of the NPPF[44], development on previously developed land will be recognised as an efficient use of land. Development of previously undeveloped land and greenfield sites is not considered to be an efficient use of land.

[44] Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework. Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2 [Date accessed: 22/04/22]

SA Objective	Assessment Assumptions/Methodology
promote recycling and avoid the sterilisation of mineral resources. Remediate contaminated land and minimise the use of the best and most versatile agricultural land.	Development of an existing brownfield site would be expected to contribute positively to safeguarding greenfield land in Greater Norwich and have a minor positive impact on this objective. Development proposals situated on previously undeveloped land would be expected to pose a threat to soil within the site perimeter due to excavation, soil compaction, erosion and an increased risk of soil pollution and contamination during construction. In addition, development proposals which would result in the loss of greenfield land would be expected to contribute towards a cumulative loss of ecological habitat. This would be expected to lead to greater levels of habitat fragmentation and isolation for the local ecological network restricting the ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land has therefore been considered to have an adverse effect under this objective. For the purpose of this report, a 20ha threshold has been used based on available guidance[45]. Development proposals which would result in the loss of less than 20ha of greenfield land would be expected to have a minor negative impact on this objective. Development proposals which would result in the loss of 20ha or more of greenfield land would be expected to have a major negative impact on this objective. **Agricultural Land Classification:** The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and 3a, are referred to as the Best and Most Versatile (BMV) land[46]. In the absence of site-specific surveys to identify Grades 3a and 3b, and in line with the precautionary principle, ALC Grade 3 is considered as BMV land. Adverse impacts are expected for options which would result in a net loss of agriculturally valuable soils. Development proposals which are situated on Grade 1, 2 or 3 ALC land, and would therefore risk the loss of some of the Plan areas BMV land, would be expected to have a minor negative impact for this objective. Development proposals which are situated on Grade 4 and 5 ALC land, or land classified as 'urban' or 'non-agricultural' and would therefore help prevent the loss of the Plan areas BMV land, would be expected to have a minor positive impact for this objective. **Household Waste:** At this stage, the nature and design of pitches or plots at each site is unknown. Therefore, increases in waste and consumption of resources as a result of the construction and occupation of dwellings is unknown. Due to the extent and nature of the development (pitches for Gypsies & Travellers) it is assumed that development proposals would have a negligible impact on Greater Norwich's waste and resources.
15. Water: Maintain and enhance water quality and ensure	**Groundwater:** The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones

[45] Natural England (2009) Agricultural Land Classification: protecting the best and most versatile agricultural land. Available at: http://publications.naturalengland.org.uk/publication/35012 [Date accessed: 22/04/22]

[46] Natural England (1988) Agricultural Land Classification of England and Wales: Revised criteria for grading the quality of agricultural land (ALC011). Available at: http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736 [Date accessed: 14/04/22]

SA Objective	Assessment Assumptions/Methodology
the most efficient use of water.	(SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. As such, any development proposal that is located within a groundwater SPZ could potentially have an adverse impact on groundwater quality. **Watercourses:** Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact on the quality of the water[47]. An approximate 10m buffer zone from a watercourse should be used in which no works, clearance, storage or run-off should be permitted[48]. In this assessment, a 200m buffer zone was deemed appropriate. Development proposals located within 200m of a watercourse would be expected to have a minor negative impact on local water quality. **Water Consumption:** It is assumed that development proposals will be in accordance with the national mandatory water efficiency standard of 125 litres per person per day, as set out in the Building Regulations 2010[49]. It is assumed that all Gypsy and Traveller site proposals in the GNLP will be subject to appropriate approvals and licensing for sustainable water supply from the Environment Agency.

[47] World Health Organisation (1996) Water Quality Monitoring - A Practical Guide to the Design and Implementation of Freshwater Quality Studies and Monitoring Programmes: Chapter 2 – Water Quality. Available at: https://apps.who.int/iris/handle/10665/41851 [Date accessed: 14/04/22]

[48] Department of Agriculture, Environment and Rural Affairs (no date) Advice and Information for planning approval on land which is of nature conservation value. Available at: https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value [Date accessed: 22/04/22]

[49] The Building Regulations 2010. Available at: http://www.legislation.gov.uk/uksi/2010/2214/contents/made [Date accessed: 22/04/22]

3 Pre-mitigation site assessments

3.1 Overview

3.1.1 The process which has been used to appraise reasonable alternative sites is sequenced through two stages. Firstly, sites are assessed in terms of impacts on the baseline without consideration of mitigation. Secondly, the appraisal findings are further assessed in light of any relevant mitigation that is available through for example, emergent local plan policies.

3.1.2 The pre-mitigation assessment provides a baseline assessment of each site and identifies any local constraints. The pre-mitigation assessment does not consider mitigating factors such as local plan policy. The purpose of this stage is to identify the impacts that would need to be overcome for development to optimise sustainability performance.

3.1.3 **Table 3.1** presents a summary of the pre-mitigation impacts identified for each of the 12 reasonable alternative Gypsy and Traveller sites. The pre-mitigation assessments of the reasonable alternative sites proposed for Gypsy and Traveller pitches are presented in full in **sections 3.2** to **3.14** and should be read in conjunction with **Table 3.1**.

3.1.4 The SA assessments of the reasonable alternative sites identified positive, negligible, minor negative and major negative impacts for the SA objectives (pre-mitigation). The SA found that the proposed development at the majority of the sites would be expected to have minor negative or negligible impacts.

Table 3.1: *Pre-mitigation impacts of each site identified in the SA Report*

Site Reference	SA Objective														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5004	0	+	-	0	+	-	0	--	0	--	+	-	0	-	-
GNLP5005	-	+	--	0	+	-	0	-	0	--	-	-	0	-	-
GNLP0581/2043GT	+/-	--	-	-	+	+/-	0	-	0	+/-	+	-	-	-	-
GNLP5009	0	+	-	-	+	-	0	-	0	-	+	-	-	-	-
GNLP5013	0	+	-	0	+	-	0	-	0	--	-	-	0	+	-
GNLP5014	-	+	+/-	-	+	-	0	--	0	--	+	-	0	-	0
GNLP5019	0	-	-	0	+	-	0	--	0	--	+	--	0	-	0
GNLP5020	0	-	-	0	+	-	0	--	0	--	-	-	0	-	-
GNLP5021	-	+	-	0	+	-	0	--	0	--	+	-	0	-	-
GNLP5022	0	-	-	0	+	-	0	--	0	--	+	-	0	-	-
GNLP5023	-	+	-	-	+	-	0	-	0	--	+	-	0	-	-
GNLP5024	0	-	-	0	+	-	0	--	0	--	-	-	0	-	-

3.2 Site GNLP5004 – Land off Buxton Road, Eastgate

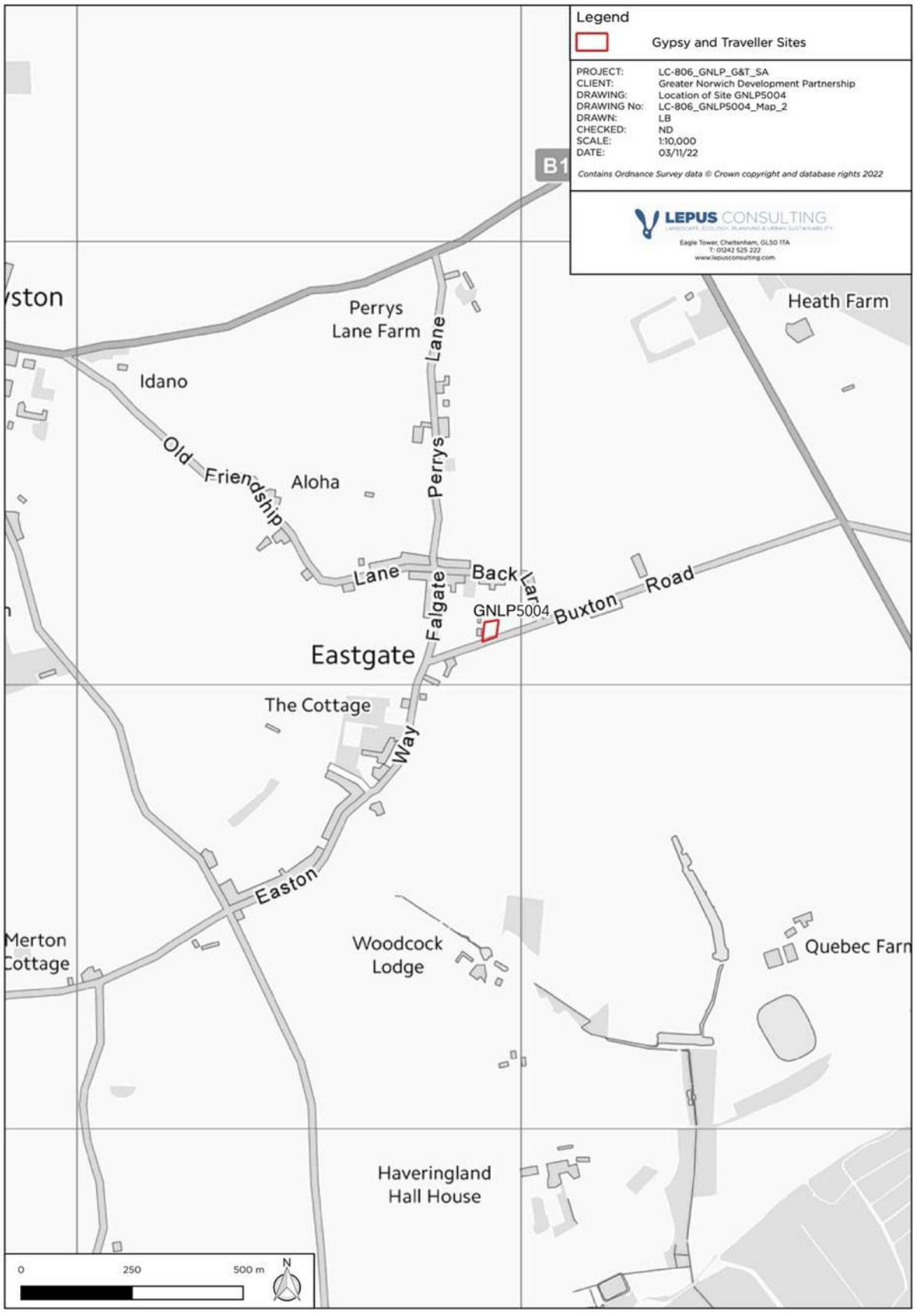


Figure 3.1: *Location of proposed Gypsy and Traveller Site GNLP5004*

Site GNLP5004: Site information and overall scores per SA Objective (pre-mitigation)

Site Name	Area (ha)	Proposed No. of Pitches
Land off Buxton Road, Eastgate	0.12	4

SA Objective														
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
0	+	-	0	+	-	0	--	0	--	+	-	0	-	-

SA1: Air Quality and Noise

3.2.1 **Air and Noise Pollution:** Site GNLP5004 is proposed for small-scale development (four Gypsy and Traveller pitches) and is situated away from major sources of air and noise pollution. A negligible impact on local air quality and noise would be expected.

SA2: Climate Change Mitigation and Adaptation

3.2.2 **Fluvial Flooding:** Site GNLP5004 is located wholly within Flood Zone 1. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

SA3: Biodiversity, Geodiversity and Green Infrastructure

3.2.3 **Habitats Sites**: Site GNLP5004 is located approximately 2.3km from 'Norfolk Valley Fens' SAC and 12.8km from 'Broadland' SPA/Ramsar and 'The Broads' SAC . It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

3.2.4 **SSSI IRZ**: Site GNLP5004 is located within a Nutrient Impact Area, within an IRZ which states that "*for new development with overnight accommodation Reg 63 of the Conservation of Habitats and Species Regulations 2017 must be applied and additional measures required. LPA to refer to Natural England's Nutrient Neutrality advice*". A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

SA4: Landscape

3.2.5 **Landscape Character:** Site GNLP5004 is located within the LCA 'Cawston Tributary Farmland'. Some key characteristics of this LCA include the mosaic of arable fields, woodland and parkland, and landscape setting of villages and notable buildings. Due to the expected small-scale development (four Gypsy and Traveller pitches) situated in a small enclosed field, it is not anticipated that development proposals would be discordant with this LCA. Therefore, a negligible impact on the landscape character would be expected.

SA5: Housing

3.2.6 **Provision of Pitches:** Site GNLP5004 is proposed for the development of four Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

SA6: Population and Communities

3.2.7 **Local Services:** The nearest local shop to Site GNLP5004 is Cawston Post Office and Store, located approximately 1.4km from the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

SA7: Deprivation

3.2.8 See **Table 2.4,** 'SA7: Deprivation'.

SA8: Health

3.2.9 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5004 is Norfolk and Norwich University Hospital, located approximately 16.3km from the site, outside the sustainable target distance. The proposed development at Site GNLP5004 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.

3.2.10 **GP Surgery:** Site GNLP5004 is located approximately 1.2km from the closest GP surgery, 'Dr Harrison K & Partners', outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.

3.2.11 **Leisure Facilities:** The closest leisure centre to Site GNLP5004 is 'Victory Swim and Fitness Leisure Centre', located approximately 14.8km from the site. Site GNLP5004 is located outside of the target distance to this leisure facility, and therefore a minor negative impact on the health and wellbeing of site end users would be expected.

3.2.12 **Main Road:** Site GNLP5004 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.

3.2.13 **Green Network:** Site GNLP5004 is located within 600m from the PRoW network. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

3.2.14 As Site GNLP5004 is located outside the target distance to an NHS hospital, GP surgery and leisure centre, the proposed development at this site would be expected to have a major negative impact on the health and wellbeing of site end users.

SA9: Crime

3.2.15 See **Table 2.4,** 'SA9: Crime'.

SA10: Education

3.2.16 **Primary/Secondary School:** Site GNLP5004 is located approximately 1.1km from the closest primary school, Cawston CE Primary School. The site is also located approximately 5.3km from the closest secondary school, Reepham High School and College. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

SA11: Economy

3.2.17 **Primary Employment Location:** Site GNLP5004 is located approximately 5km from the market town of Reepham, which would be expected to provide a range of employment opportunities for site end users and is within the sustainable target distance. Therefore, a minor positive impact on the local economy would be expected.

SA12: Transport and Access to Services

3.2.18 **Bus Stop:** Site GNLP5004 is located within the target distance to bus service '42', Reepham to Norwich route; however, this only provides two services per day. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to bus services.

3.2.19 **Railway Station:** Site GNLP5004 is located outside the target distance to a railway station, with the nearest being North Walsham Railway Station situated over 14km to the north east. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.

3.2.20 **Pedestrian Access:** Site GNLP5004 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.

3.2.21 **Road Network:** Site GNLP5004 is well connected to the existing road network. The proposed development would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

SA13: Historic Environment

3.2.22 **Heritage Assets:** The development proposed at Site GNLP5004 would be unlikely to significantly impact any surrounding heritage assets, and therefore, would be expected to have a negligible impact on the local historic environment.

SA14: Natural Resources, Waste and Contaminated Land

3.2.23 **Previously Developed Land:** Site GNLP5004 is located upon 0.12ha of previously undeveloped land. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

3.2.24 **ALC:** Site GNLP5004 is situated upon ALC Grade 2 land which represents some of Greater Norwich's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this important natural resource.

SA15: Water

3.2.25 **SPZ:** Site GNLP5004 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.

3.3 Site GNLP5005 – Wymondham Recycling Centre, Strayground Lane

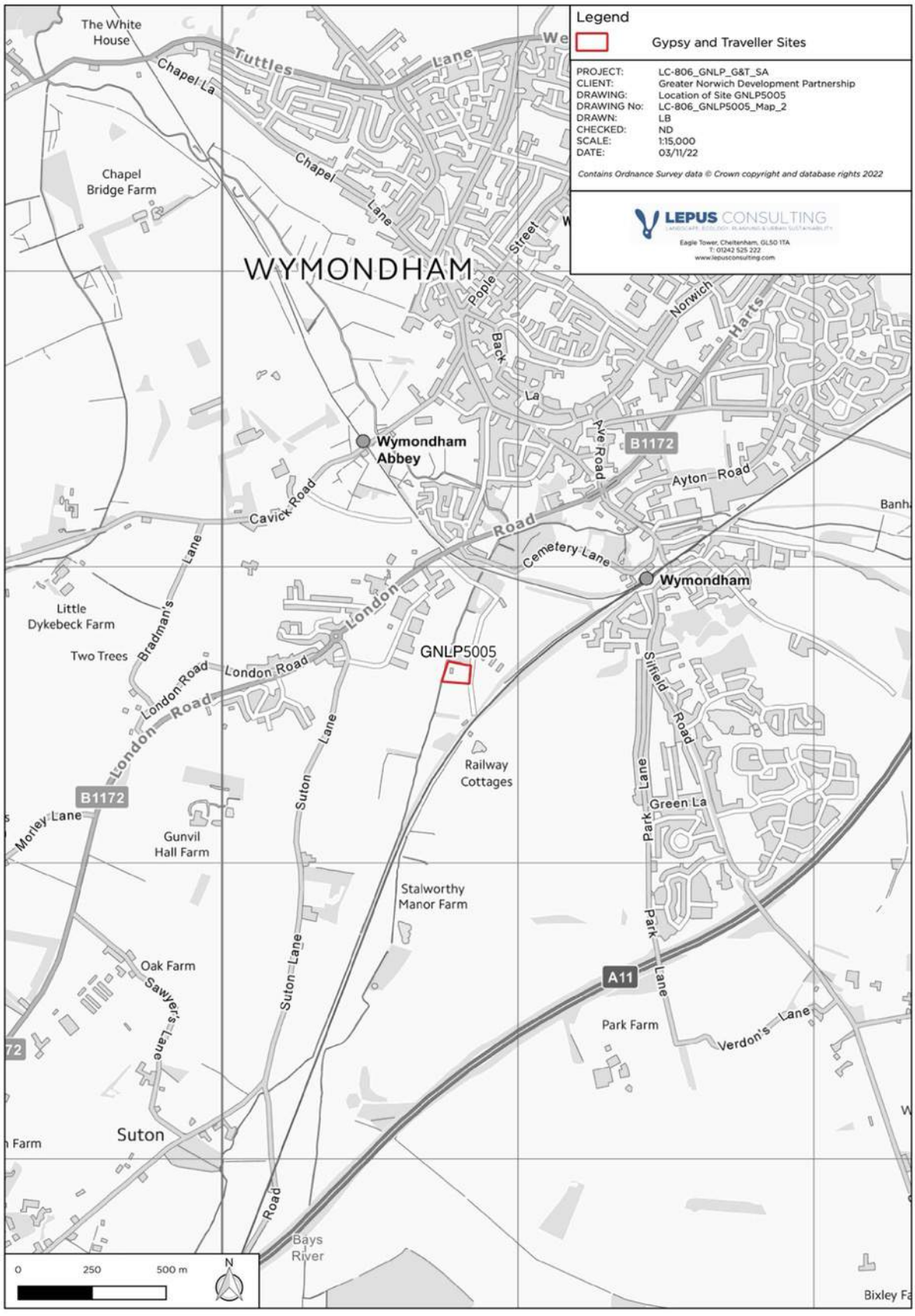


Figure 3.2: Location of proposed Gypsy and Traveller Site GNLP5005

Site GNLP5005: Site information and overall scores per SA Objective (pre-mitigation)

Site Name	Area (ha)	Proposed No. of Pitches
Wymondham Recycling Centre, Strayground Lane	0.07	2

SA Objective														
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
-	+	--	0	+	-	0	-	0	--	-	-	0	-	-

SA1: Air Quality and Noise

3.3.1 **Railway Line:** Site GNLP5005 is located within 200m of a railway line, therefore the proposed development at this site could potentially expose site end users to higher levels of noise pollution and vibrations associated with this railway. A minor negative impact would be expected.

SA2: Climate Change Mitigation and Adaptation

3.3.2 **Fluvial Flooding:** Site GNLP5005 is located wholly within Flood Zone 1. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

SA3: Biodiversity, Geodiversity and Green Infrastructure

3.3.3 **Habitats Sites**: Site GNLP5005 is located approximately 7.8km from 'Norfolk Valley Fens' SAC, 12.5km from 'River Wensum' SAC and 20km from 'Broadland' SPA/Ramsar and 'The Broads' SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

3.3.4 **SSSI IRZ**: Site GNLP5005 is located within a Nutrient Impact Area, within an IRZ which states that "*for new development with overnight accommodation Reg 63 of the Conservation of Habitats and Species Regulations 2017 must be applied and additional measures required. LPA to refer to Natural England's Nutrient Neutrality advice*". A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

3.3.5 **County Wildlife Site:** The north of Site GNLP5005 coincides with a section of 'Bays River Meadows North' CWS. It is noted that part of this section of the CWS within the boundary of Site GNLP5005 comprises hardstanding associated with Wymondham Recycling Centre; however, a section along the northern site boundary remains undeveloped. The proposed development at this site could potentially result in direct adverse impacts on this CWS, and therefore a major negative impact on biodiversity could be expected.

3.3.6 **Priority Habitats:** The north of Site GNLP5005 coincides with approximately 0.01ha of lowland fens priority habitat. Therefore, the proposed development at this site could potentially result in the partial loss or degradation of this habitat, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.

SA4: Landscape

3.3.7 **Landscape Character:** Site GNLP5005 is located within the LCA 'Tiffey Tributary Farmland'. Some key characteristics of this LCA include large scale arable farmland, water bodies, sparse settlements and long views. Due to the expected small-scale development (two Gypsy and Traveller pitches) situated on a partially developed site, it is not anticipated that development proposals would be discordant with this LCA. Therefore, a negligible impact on the landscape character would be expected.

SA5: Housing

3.3.8 **Provision of Pitches:** Site GNLP5005 is proposed for the development of two Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

SA6: Population and Communities

3.3.9 **Local Services:** The nearest local shop to Site GNLP5005 is Co-op, located just over 600m from the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

3.3.10 **Local Landscape Designations:** Site GNLP5005 is located within 600m from natural and semi-natural greenspace at Tolls Meadow. The proposed development at this site would therefore be likely to provide site end users with good access to this asset, and as such, result in a minor positive impact on opportunities for integration with the local community.

SA7: Deprivation

3.3.11 See **Table 2.4,** 'SA7: Deprivation'.

SA8: Health

3.3.12 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5005 is Norfolk and Norwich University Hospital, located approximately 9.7km from the site, outside the sustainable target distance. The proposed development at Site GNLP5005 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.

3.3.13 **GP Surgery:** Site GNLP5005 is located approximately 840m from the closest GP surgery, 'Dr Watts', outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.

3.3.14 **Leisure Facilities:** The closest leisure centre to Site GNLP5005 is 'Wymondham Leisure Centre', located approximately 1.3km from the site. Site GNLP5005 is located within the target distance to this leisure facility, and therefore a minor positive impact on the health and wellbeing of site end users would be expected.

3.3.15 **Main Road:** Site GNLP5005 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.

3.3.16 **Green Network:** Site GNLP5005 is located within 600m from the PRoW network and open greenspaces, including play space and a cemetery. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

SA9: Crime

3.3.17 See **Table 2.4,** 'SA9: Crime'.

SA10: Education

3.3.18 **Primary/Secondary School:** Site GNLP5005 is located approximately 960m from the closest primary school, Browick Road Primary School. The majority of Site GNLP5005 is located outside of the sustainable distance to the closest secondary school, Wymondham High Academy. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

SA11: Economy

3.3.19 **Primary Employment Location:** Site GNLP5005 is located approximately 300m from Wymondham Business Park with many potential employment opportunities for site end users, including businesses 'Express Equine', 'Supreme Bathroom and Kitchen Centre' and 'Abbeygate Accident and Repair', in addition to those expected in Wymondham Town Centre. Therefore, a minor positive impact on the local economy would be expected.

3.3.20 **Employment Floorspace:** Site GNLP5005 coincides with 'Wymondham Recycling Centre'. The proposed development of this site could potentially result in the loss of any employment opportunities currently associated with this site. Therefore, a minor negative impact could be expected following development at this site.

SA12: Transport and Access to Services

3.3.21 **Bus Stop:** Site GNLP5005 is located outside the target distance to a bus stop. The closest bus stop is located approximately 410m from the site on London Road and provides regular services '13', '13A', '13B' and '805', including routes to Norwich and the surrounding area. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.

3.3.22 **Railway Station:** Site GNLP5005 is located within the target distance to Wymondham Railway Station. The proposed development at this site would be likely to have a minor positive impact on the access of site end users to rail services.

3.3.23 **Pedestrian Access:** Site GNLP5005 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.

3.3.24 **Road Network:** Site GNLP5005 is well connected to the existing road network. The proposed development would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

SA13: Historic Environment

3.3.25 **Grade II Listed Building:** Site GNLP5005 is located approximately 350m from the Grade II Listed Building 'Ivy Green Villa'. Due to this distance and intervening development (Wymondham Business Park), and the expected small number of pitches at this site, it is not anticipated that it would affect the setting of this Listed Building. Therefore, the proposed development at this site would be expected to result in a negligible impact on the historic environment.

SA14: Natural Resources, Waste and Contaminated Land

3.3.26 **Previously Developed Land:** Site GNLP5005 is located upon 0.07ha of primarily previously developed land; however, the site also contains an undeveloped area along the Bays River. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

3.3.27 **ALC:** Site GNLP5005 is situated upon ALC Grade 2 land which represents some of Greater Norwich's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this important natural resource.

SA15: Water

3.3.28 **SPZ:** Site GNLP5005 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.

3.3.29 **Watercourse:** Site GNLP5005 is located approximately 70m from the Bays River. The proposed development at this site could potentially increase the risk of contamination of this watercourse, and therefore, a minor negative impact would be expected.

3.4 Site GNLP0581/2043GT – Land off Bawburgh Lane, north of New Road and east of the A47, Costessey (Contingency Site)

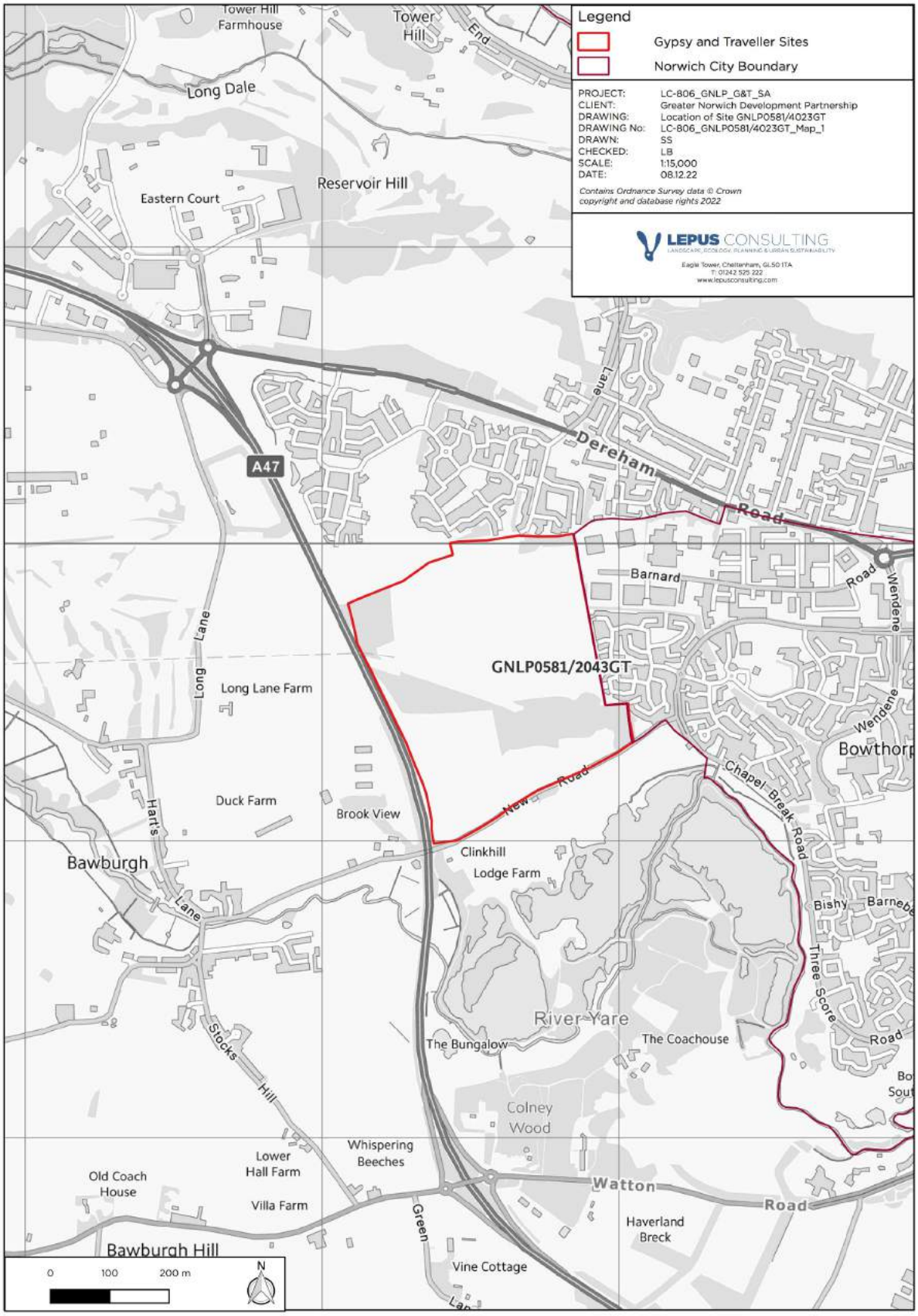


Figure 3.3: *Location of proposed Gypsy and Traveller Site GNLP0581/2043GT*

Site GNLP0581/2043GT: Site information and overall scores per SA Objective (pre-mitigation)

Site Name	Area (ha)	Proposed No. of Pitches
Land off Bawburgh Lane, north of New Road and east of the A47, Costessey (Contingency Site)	1ha of the 62.33ha larger site at Costessey	18

SA Objective														
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
+/-	+/-	-	-	+	+/-	0	-	0	+/-	+	-	-	-	-

SA1: Air Quality and Noise

3.4.1 **Main Road:** The A47 is located adjacent to the western boundary of Site GNLP0581/2043GT, with a proportion of the site located within 200m of this main road. The proposed development at this site could potentially expose site end users to higher levels of transport associated air and noise pollution. The exact location of the Gypsy and Traveller pitches within the wider site boundary is unknown at the time of writing, beyond that it would be in the southern section of the site. As such, it is uncertain whether site end users would be located within 200m of this road, and consequently whether they would be exposed to associated air pollution.

SA2: Climate Change Mitigation and Adaptation

3.4.2 **Fluvial Flooding:** Site GNLP0581/2043GT is located wholly within Flood Zone 1. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

3.4.3 **Surface Water Flooding:** A large proportion of Site GNLP0581/2043GT coincides with an area determined to be at low, medium and high risk of surface water flooding. Depending on the specific location of the Gypsy and Traveller pitches within the south of the wider site, the proposed development could potentially locate some site end users in areas at high risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations. At this stage, the potential impact is uncertain.

SA3: Biodiversity, Geodiversity and Green Infrastructure

3.4.4 **Habitats Sites**: Site GNLP0581/2043GT is located approximately 1.7km from 'River Wensum' SAC and 11.1km from 'Broadland' SPA/Ramsar and 'The Broads' SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

3.4.5 **SSSI IRZ**: Site GNLP0581/2043GT is located within a Nutrient Impact Area, within an IRZ which states that "*for new development with overnight accommodation Reg 63 of the Conservation of Habitats and Species Regulations 2017 must be applied and additional measures required. LPA to refer to Natural England's Nutrient Neutrality advice*". A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

3.4.6 **Priority Habitats:** Site GNLP0581/2043GT coincides with approximately 7ha of deciduous woodland priority habitat, in the north west and south east of the site. The specific location of the Gypsy and Traveller pitches within the wider site boundary is unknown at the time of writing, and as such, it is uncertain whether the proposed development would result in the loss of any priority habitat.

SA4: Landscape

3.4.7 **Landscape Character:** Site GNLP0581/2043GT is located within the LCA 'Yare Valley Urban Fringe'. Some key characteristics of this LCA include the wide, flat floodplain, recreational landscape and green buffer between the river valley and Norwich City. The proposed development at this site could potentially result in a small-scale erosion of this green buffer and may alter wide views, and therefore, have a minor negative impact on the local landscape character.

3.4.8 **Views for Local Residents:** Site GNLP0581/2043GT extends outside the outskirts of Norwich City, adjacent to Bowthorpe and Chapel Break, and the proposed development at this site has the potential to alter views experienced by local residents of surrounding dwellings to some extent. Therefore, a minor negative impact on the local landscape would be expected.

3.4.9 **Urbanisation of the Countryside:** Site GNLP0581/2043GT comprises previously undeveloped land and is located outside of Bowthorpe on the outskirts of the city of Norwich. Therefore, the proposed development at this site could potentially contribute towards the urbanisation of the countryside. A minor negative impact on the local landscape would be expected.

SA5: Housing

3.4.10 **Provision of Pitches:** Site GNLP0581/2043GT is proposed for the development of 18 Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

SA6: Population and Communities

3.4.11 **Local Services:** The nearest local shop to Site GNLP0581/2043GT is Co-op, located approximately 600m from the site at its closest point; however, the majority of the site is located outside of the sustainable target distance to this shop. The specific location of the Gypsy and Traveller pitches within the wider site boundary is unknown at the time of writing, and as such, it is uncertain whether site end users would be located within the sustainable target distance to local services.

3.4.12 **Local Landscape Designations:** A proportion of Site GNLP0581/2043GT is located within 600m of local landscape designations including amenity open space at Harts Lane and New Road, and informal open spaces in Chapel Break. The location of the Gypsy and Traveller pitches within the wider site boundary is unknown at the time of writing, and as such, it is uncertain whether site end users would be located in areas with good access to these assets, and consequently the opportunities for integration with the local community that they may provide.

SA7: Deprivation

3.4.13 See **Table 2.4,** 'SA7: Deprivation'.

SA8: Health

3.4.14 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP0581/2043GT is Norfolk and Norwich University Hospital, located approximately 2.5km from the site, within the sustainable target distance. The proposed development at Site GNLP0581/2043GT would be expected to provide site end users with good access to this healthcare facility and therefore a minor positive impact would be expected.

3.4.15 **GP Surgery:** The closest GP surgeries to Site GNLP0581/2043GT are 'Dr Lockett and Partners', 'Roundwell Medical Centre' and 'Bowthorpe Health Centre'. A proportion of the site, to the east, is located within the target distance to one or more of these GP surgeries however the majority of the site lies outside of this target distance. The location of the Gypsy and Traveller pitches within the wider site boundary is unknown at the time of writing, beyond that it would be in the southern section of the site. As such, it is uncertain whether site end users would be located within the sustainable target distance to GP surgeries.

3.4.16 **Leisure Facilities:** The closest leisure centre to Site GNLP0581/2043GT is 'Riverside Leisure Centre', located approximately 6.8km from the site. Site GNLP0581/2043GT is located outside of the target distance to this leisure facility, and therefore a minor negative impact on the health and wellbeing of site end users would be expected.

3.4.17 **Main Road:** Site GNLP0581/2043GT is located partially within 200m of a main road, the A47. The proposed development at this site could potentially expose site end users to higher levels of transport associated air pollution. The location of the Gypsy and Traveller pitches within the wider site boundary is unknown at the time of writing, beyond that it would be in the southern section of the site. As such, it is uncertain whether site end users would be located within 200m of this road, and consequently whether they would be exposed to associated air pollution.

3.4.18 **Green Network:** Site GNLP0581/2043GT is located partially within 600m of various open greenspaces, including play spaces and playing fields. However, a proportion of the site lies outside of this sustainable target distance. The location of the Gypsy and Traveller pitches within the wider site boundary is unknown at the time of writing, beyond that it would be in the southern section of the site. As such, it is uncertain whether site end users would be located within 600m of outdoor spaces for recreation and exercise and consequently the health benefits they provide.

SA9: Crime

3.4.19 See **Table 2.4,** 'SA9: Crime'.

SA10: Education

3.4.20 **Primary School:** Site GNLP0581/2043GT is located approximately 500m from Chapel Break Infant School and approximately 720m from the The Bawburgh School (primary school), at its closest point (at the eastern edge of the site). However, the majority of the site is located outside of the target distance to these facilities. The specific location of the Gypsy and Traveller pitches within the wider site boundary is unknown at the time of writing, and as such, it is uncertain whether site end users would be located within the sustainable target distance to primary schools.

3.4.21 **Secondary School:** The majority of Site GNLP0581/2043GT is located within 1.5km of Ormiston Victory Academy, however, a proportion of the site in the south west is situated outside of this sustainable target distance. The specific location of the Gypsy and Traveller pitches within the wider site boundary is unknown at the time of writing, and as such, it is uncertain whether site end users would be located within the sustainable target distance to secondary schools.

SA11: Economy

3.4.22 **Primary Employment Location:** Site GNLP0581/2043GT is located approximately 740m from Bowthorpe Employment Area in the outskirts of Norwich City, which would be expected to provide a range of employment opportunities for site end users and is within the sustainable target distance. Therefore, a minor positive impact on the local economy would be expected.

SA12: Transport and Access to Services

3.4.23 **Bus Stop:** The majority of Site GNLP0581/2043GT is located outside the target distance to a bus stop that provides a regular service. A small proportion of the site, in the east, is located within 400m of bus stops in Chapel Break providing regular services. The specific location of the Gypsy and Traveller pitches within the wider site boundary is unknown at the time of writing, and as such, it is uncertain whether site end users would be located within the sustainable target distance to bus services.

3.4.24 **Railway Station:** Site GNLP0581/2043GT is located outside the target distance to a railway station, with the nearest being Norwich Railway Station situated over 7km to the east. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.

3.4.25 **Pedestrian Access:** Site GNLP0581/2043GT currently has good access to the surrounding footpath network in some locations (namely to the east and northern edges); however, the remainder of the site has poor connectivity for pedestrians. The specific location of the Gypsy and Traveller pitches within the wider site boundary is unknown at the time of writing, beyond that it would be in the southern section of the site. As such, it is uncertain whether site end users would be located in areas with good local accessibility.

3.4.26 **Road Network:** Site GNLP0581/2043GT is well connected to the existing road network at the site edges. However, the specific location of the Gypsy and Traveller pitches within the wider site boundary is unknown at the time of writing, and as such, it is uncertain whether site end users would be located in areas with good connectivity to the surrounding road network.

SA13: Historic Environment

3.4.27 **Grade II* Listed Building:** At its closest point, Site GNLP0581/2043GT is located approximately 270m from Grade II* Listed Building 'Lodge Farmhouse'. There is potential for the proposed development to result in a minor negative impact on the setting of the Listed Building.

SA14: Natural Resources, Waste and Contaminated Land

3.4.28 **Previously Developed Land:** Site GNLP0581/2043GT is located upon 62.33ha of previously undeveloped land, with the net area for the proposed Gypsy and Traveller pitches comprising approximately 1ha. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

3.4.29 **ALC:** The majority of Site GNLP0581/2043GT is situated upon ALC Grade 3 land which could potentially be some of Greater Norwich's BMV land. A small proportion in the south of the site is situated upon ALC Grade 4 land, which is considered to be poor quality agricultural land. The specific location of the Gypsy and Traveller pitches within the wider site boundary is unknown at the time of writing, and as such, it is uncertain whether the development would be situated on Grade 3 or 4 land and consequently whether the development would have positive or negative effects on the conservation of BMV land.

SA15: Water

3.4.30 **SPZ:** Site GNLP0581/2043GT coincides with the outer zone (Zone II) and catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.

3.5 Site GNLP5009 – Hockering Lane

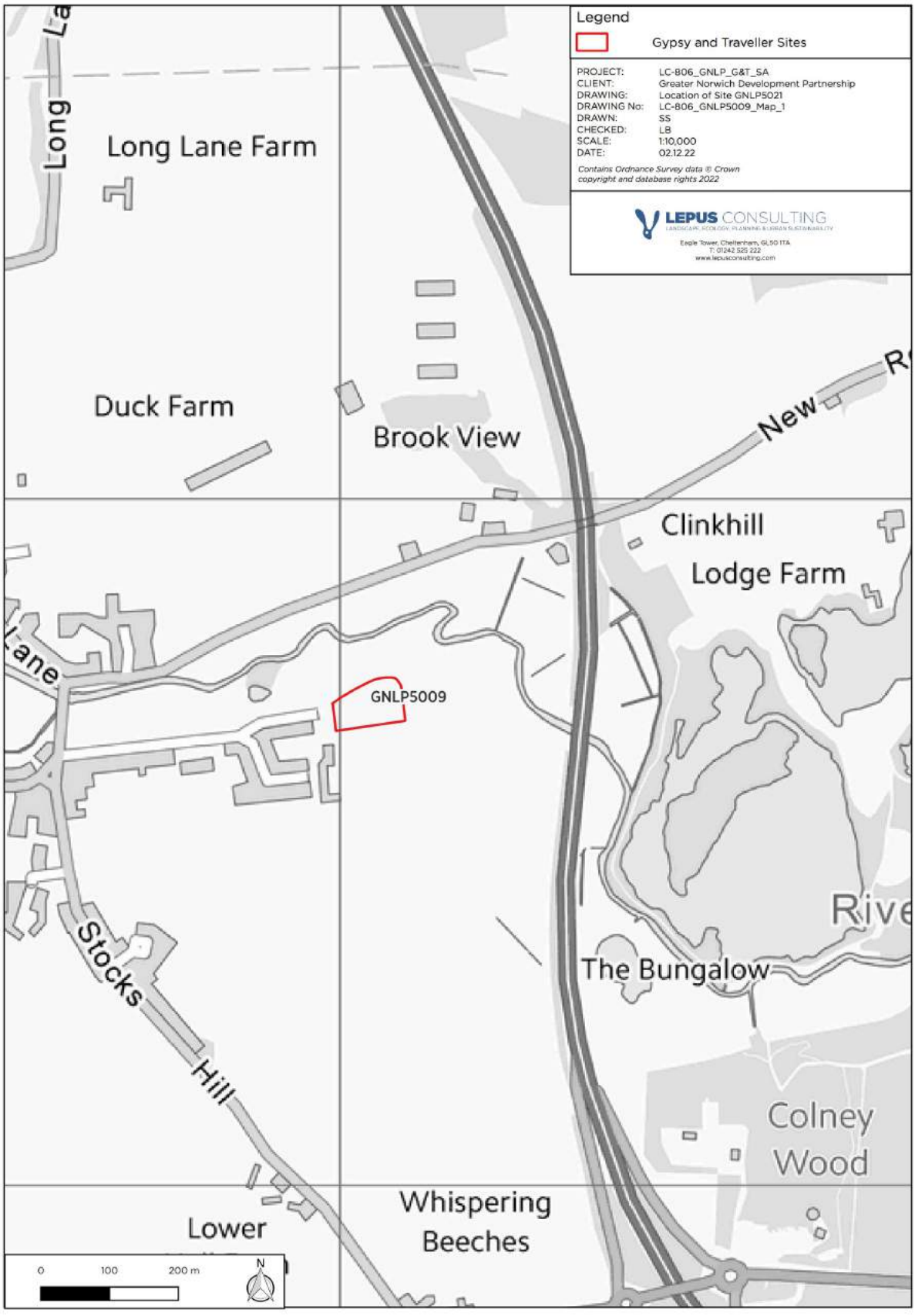


Figure 3.4: *Location of proposed Gypsy and Traveller Site GNLP5009*

Site GNLP5009: Site information and overall scores per SA Objective (pre-mitigation)

Site Name	Area (ha)	Proposed No. of Pitches
Hockering Lane	0.59	6

SA Objective														
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
0	+	-	-	+	-	0	-	0	-	+	-	-	-	-

SA1: Air Quality and Noise

3.5.1 **Air and Noise Pollution:** Site GNLP5009 is proposed for small-scale development (six Gypsy and Traveller pitches), and is situated away from major sources of air and noise pollution. A negligible impact on local air quality and noise would be expected.

SA2: Climate Change Mitigation and Adaptation

3.5.2 **Fluvial Flooding:** Site GNLP5009 is located wholly within Flood Zone 1. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

SA3: Biodiversity, Geodiversity and Green Infrastructure

3.5.3 **Habitats Sites**: Site GNLP5009 is located approximately 3km from 'River Wensum' SAC and 12.5km from 'Broadland' SPA/Ramsar and 'The Broads' SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites.

3.5.4 **SSSI IRZ**: Site GNLP5009 is located within a Nutrient Impact Area, within an IRZ which states that "*for new development with overnight accommodation Reg 63 of the Conservation of Habitats and Species Regulations 2017 must be applied and additional measures required. LPA to refer to Natural England's Nutrient Neutrality advice*". A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

SA4: Landscape

3.5.5 **Landscape Character:** Site GNLP5009 is located within the LCA 'Yare/Tiffey Rural River Valley'. Some key characteristics of this LCA include vegetated valley floor, meandering rivers, pastoral land use, small woodland blocks, and small attractive villages. Site GNLP5009 comprises an area of arable farmland and hedgerow/trees outside of the existing settlement of Bawburgh, in close proximity to the River Yare. The proposed development at this site could potentially result in some small-scale loss or degradation of vegetation associated with the river corridor, and therefore, have a minor negative impact on the local landscape character.

3.5.6 **Views for Local Residents:** Site GNLP5009 is located within the outskirts of Bawburgh and the proposed development at this site has the potential to alter views experienced by local residents of surrounding dwellings to some extent, such as those on Hockering Lane. Therefore, a minor negative impact on the local landscape would be expected.

3.5.7 **Urbanisation of the Countryside:** Site GNLP5009 comprises previously undeveloped land and is located outside of Bawburgh. Therefore, the proposed development at this site could potentially contribute towards the urbanisation of the countryside. A minor negative impact on the local landscape would be expected.

SA5: Housing

3.5.8 **Provision of Pitches:** Site GNLP5009 is proposed for the development of six Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

SA6: Population and Communities

3.5.9 **Local Services:** The nearest local shop to Site GNLP5009 is Co-op, located approximately 1.7km from the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

3.5.10 **Local Landscape Designations:** Site GNLP5009 is located within 600m from Bawburgh Allotments, Village Green and amenity open space at Harts Land and New Road. The proposed development at this site would therefore be likely to provide site end users with good access to these assets, and as such, result in a minor positive impact on opportunities for integration with the local community.

SA7: Deprivation

3.5.11 See **Table 2.4,** 'SA7: Deprivation'.

SA8: Health

3.5.12 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5009 is Norfolk and Norwich University Hospital, located approximately 2.6km from the site, within the sustainable target distance. The proposed development at Site GNLP5009 would be expected to provide site end users with good access to this healthcare facility and therefore a minor positive impact would be expected.

3.5.13 **GP Surgery:** Site GNLP5009 is located approximately 1.6km from the closest GP surgery, 'Bowthorpe Health Centre', outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.

3.5.14 **Leisure Facilities:** The closest leisure centre to Site GNLP5009 is 'Riverside Leisure Centre', located approximately 7.9km from the site. Site GNLP5009 is located outside of the target distance to this leisure facility, and therefore a minor negative impact on the health and wellbeing of site end users would be expected.

3.5.15 **Main Road:** Site GNLP5009 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.

3.5.16 **Green Network:** Site GNLP5009 is located within 600m from an open greenspace (play space). Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

SA9: Crime

3.5.17 See **Table 2.4,** 'SA9: Crime'.

SA10: Education

3.5.18 **Primary School:** Site GNLP5009 is located approximately 200m from The Bawburgh School, within the sustainable target distance. Therefore, a minor positive impact on the access of site end users to primary education would be expected.

3.5.19 **Secondary School:** Site GNLP5009 is located approximately 2.1km from the closest secondary school, Ormiston Victory Academy. Therefore, as the site is located outside of the sustainable target distance to this facility, a minor negative impact on the access of site end users to secondary education would be expected.

SA11: Economy

3.5.20 **Primary Employment Location:** Site GNLP5009 is located approximately 1.8km from Bowthorpe Employment Area in the outskirts of Norwich City, which would be expected to provide a range of employment opportunities for site end users and is within the sustainable target distance. Therefore, a minor positive impact on the local economy would be expected.

SA12: Transport and Access to Services

3.5.21 **Bus Stop:** Site GNLP5009 is located outside the target distance to a bus stop that provides a regular service. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.

3.5.22 **Railway Station:** Site GNLP5009 is located outside the target distance to a railway station, with the nearest being Norwich Railway Station situated over 7km to the east. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.

3.5.23 **Pedestrian Access:** Site GNLP5009 is well connected to the existing footpath network, via pavement. The proposed development at this site would be expected to have a minor positive impact on the access of site end users to the site and surrounding areas.

3.5.24 **Road Network:** Site GNLP5009 is well connected to the existing road network. The proposed development would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on local accessibility.

SA13: Historic Environment

3.5.25 **Grade II* Listed Building:** Site GNLP5009 is located approximately 260m from the Grade II* Listed Building 'The Slipper Chapel in Garden of Brecon House' and 280m from 'The Hermit's House'. The site is separated from these Listed Buildings by the undeveloped River Yare corridor. The proposed development at this site could potentially alter the setting of these Listed Buildings, and therefore, a minor negative impact on the local historic environment would be expected.

3.5.26 **Conservation Area:** Site GNLP5009 is located approximately 170m from 'Bawburgh' CA. The proposed development at this site could potentially alter the setting of this CA to some extent, and as such have a minor negative impact on the local historic environment.

3.5.27 **Scheduled Monument:** Site GNLP5009 is located approximately 280m from 'Two Garden Houses near the Hall' SM, across the undeveloped River Yare corridor. The proposed development at this site could potentially have a minor negative impact on the setting of this SM.

SA14: Natural Resources, Waste and Contaminated Land

3.5.28 **Previously Developed Land:** Site GNLP5009 is located upon 0.59ha of previously undeveloped land. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

3.5.29 **ALC:** Site GNLP5009 is situated upon ALC Grade 4, which is considered to be poor quality agricultural land. Therefore, a minor positive impact on natural resources could be expected as development would help to prevent the loss of BMV land across the Plan area.

SA15: Water

3.5.30 **SPZ:** Site GNLP5009 coincides with the outer zone (Zone II) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.

3.5.31 **Watercourse:** Site GNLP5009 is located within 200m of the River Yare. The proposed development at this site could potentially increase the risk of contamination of this watercourse, and therefore, a minor negative impact would be expected.

3.6 Site GNLP5013 – Ketteringham Recycling Centre (revised area)

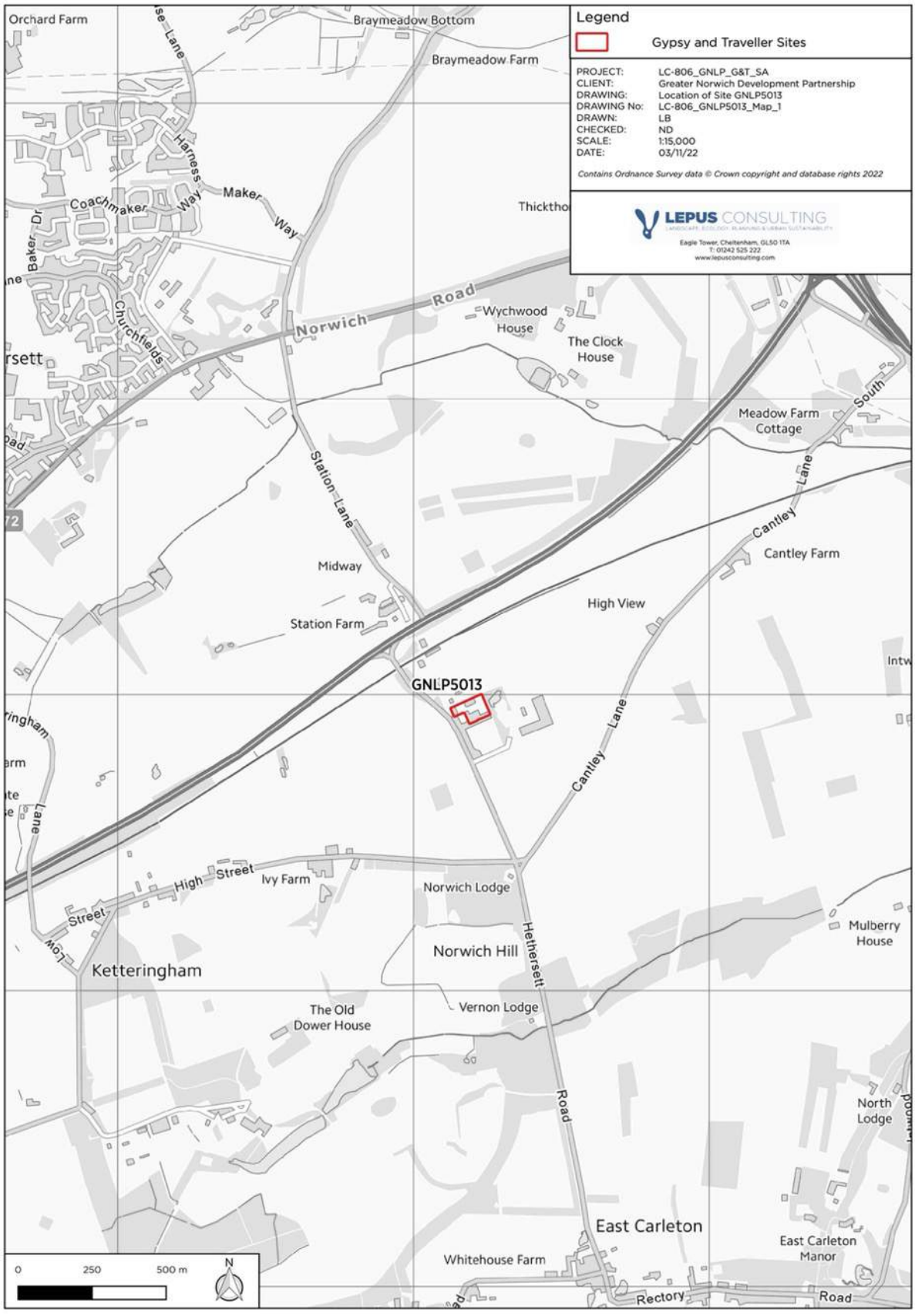


Figure 3.5: *Location of proposed Gypsy and Traveller Site GNLP5013*

Site GNLP5013: Site information and overall scores per SA Objective (pre-mitigation)

Site Name	Area (ha)	Proposed No. of Pitches
Ketteringham Recycling Centre (revised area)	0.70	10

SA Objective														
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
0	+	-	0	+	-	0	-	0	--	-	-	0	+	-

SA1: Air Quality and Noise

3.6.1 **Air and Noise Pollution:** Site GNLP5013 is proposed for small-scale development (10 Gypsy and Traveller pitches) and is situated away from major sources of air and noise pollution. A negligible impact on local air quality and noise would be expected.

SA2: Climate Change Mitigation and Adaptation

3.6.2 **Fluvial Flooding:** Site GNLP5013 is located wholly within Flood Zone 1. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

SA3: Biodiversity, Geodiversity and Green Infrastructure

3.6.3 **Habitats Sites**: Site GNLP5013 is located approximately 6.4km from 'Norfolk Valley Fens' SAC, 7km from 'River Wensum' SAC and 13.5km from 'Broadland' SPA/Ramsar and 'The Broads' SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

3.6.4 **SSSI IRZ**: Site GNLP5013 is located within a Nutrient Impact Area, within an IRZ which states that "*for new development with overnight accommodation Reg 63 of the Conservation of Habitats and Species Regulations 2017 must be applied and additional measures required. LPA to refer to Natural England's Nutrient Neutrality advice*". A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

SA4: Landscape

3.6.5 **Landscape Character:** Site GNLP5013 is located within the LCA 'Yare Tributary Farmland with Parkland'. Some key characteristics of this LCA include meandering rivers, blocks of woodland, avenues of poplars and small villages with strong vernacular qualities. Site GNLP5013 comprises previously developed land and is situated amongst an existing industrial area. The proposed development at this site would be unlikely to affect any of these identified key characteristics, and therefore, a negligible impact on the landscape character would be expected.

SA5: Housing

3.6.6 **Provision of Pitches:** Site GNLP5013 is proposed for the development of 10 Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

SA6: Population and Communities

3.6.7 **Local Services:** The nearest local shop to Site GNLP5013 is Church Farm Shop, located approximately 1.4km to the north west of the site, or various shops and services in Hethersett, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

SA7: Deprivation

3.6.8 See **Table 2.4,** 'SA7: Deprivation'.

SA8: Health

3.6.9 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5013 is Norfolk and Norwich University Hospital, located approximately 3.2km from the site, within the sustainable target distance. The proposed development at Site GNLP5013 would be expected to provide site end users with good access to this healthcare facility and therefore a minor positive impact would be expected.

3.6.10 **GP Surgery:** Site GNLP5013 is located approximately 2.2km from the closest GP surgery, 'Hethersett Surgery', outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.

3.6.11 **Leisure Facilities:** The closest leisure centre to Site GNLP5013 is 'Wymondham Leisure Centre', located approximately 6km from the site. Site GNLP5013 is located outside of the target distance to this leisure facility, and therefore a minor negative impact on the health and wellbeing of site end users would be expected.

3.6.12 **Main Road:** Site GNLP5013 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.

3.6.13 **Green Network:** Site GNLP5013 is located within 600m from the PRoW network. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

SA9: Crime

3.6.14 See **Table 2.4,** 'SA9: Crime'.

SA10: Education

3.6.15 **Primary/Secondary School:** Site GNLP5013 is located approximately 1.7km from the closest primary schools, Hethersett Woodside Infant & Nursery School and Hethersett VC Junior School. The site is also located approximately 1.9km from the closest secondary school, Hethersett Academy. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

SA11: Economy

3.6.16 **Primary Employment Location:** Site GNLP5013 is located within the sustainable target distance of 5km from various employment locations, including the industrial/commercial area Penfold Drive in Wymondham, and Norwich and Norfolk University Hospital and other locations in the south west of Norwich City, which would be expected to provide a range of employment opportunities for site end users. Therefore, a minor positive impact on the local economy would be expected.

3.6.17 **Employment Floorspace:** Site GNLP5013 coincides with 'Ketteringham Depot' and 'Whites Staircases'. The proposed development of this site could potentially result in the loss of any employment opportunities currently associated with this location. Therefore, a minor negative impact could be expected following development at this site.

SA12: Transport and Access to Services

3.6.18 **Bus Stop:** Site GNLP5013 is located outside the target distance to a bus stop. The closest bus stop is located approximately 1.3km from the site on Norwich Road and provides several regular services including '13', '14' and '15' to Norwich City Centre and various other surrounding towns and villages. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.

3.6.19 **Railway Station:** Site GNLP5013 is located outside the target distance to a railway station, with the nearest being Wymondham Station situated approximately 6.4km to the south west. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.

3.6.20 **Pedestrian Access:** Site GNLP5013 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.

3.6.21 **Road Network:** Site GNLP5013 is well connected to the existing road network. The proposed development would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

SA13: Historic Environment

3.6.22 **Heritage Assets:** The development proposed at Site GNLP5013 would be unlikely to significantly impact any surrounding heritage assets, and therefore, would be expected to have a negligible impact on the local historic environment.

SA14: Natural Resources, Waste and Contaminated Land

3.6.23 **Previously Developed Land:** Site GNLP5013 comprises previously developed land. The proposed development at this site would be expected to have a minor positive impact on natural resources as development would be classed as an efficient use of land.

SA15: Water

3.6.24 **SPZ:** Site GNLP5013 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.

3.7 Site GNLP5014 – Land adjacent to A47

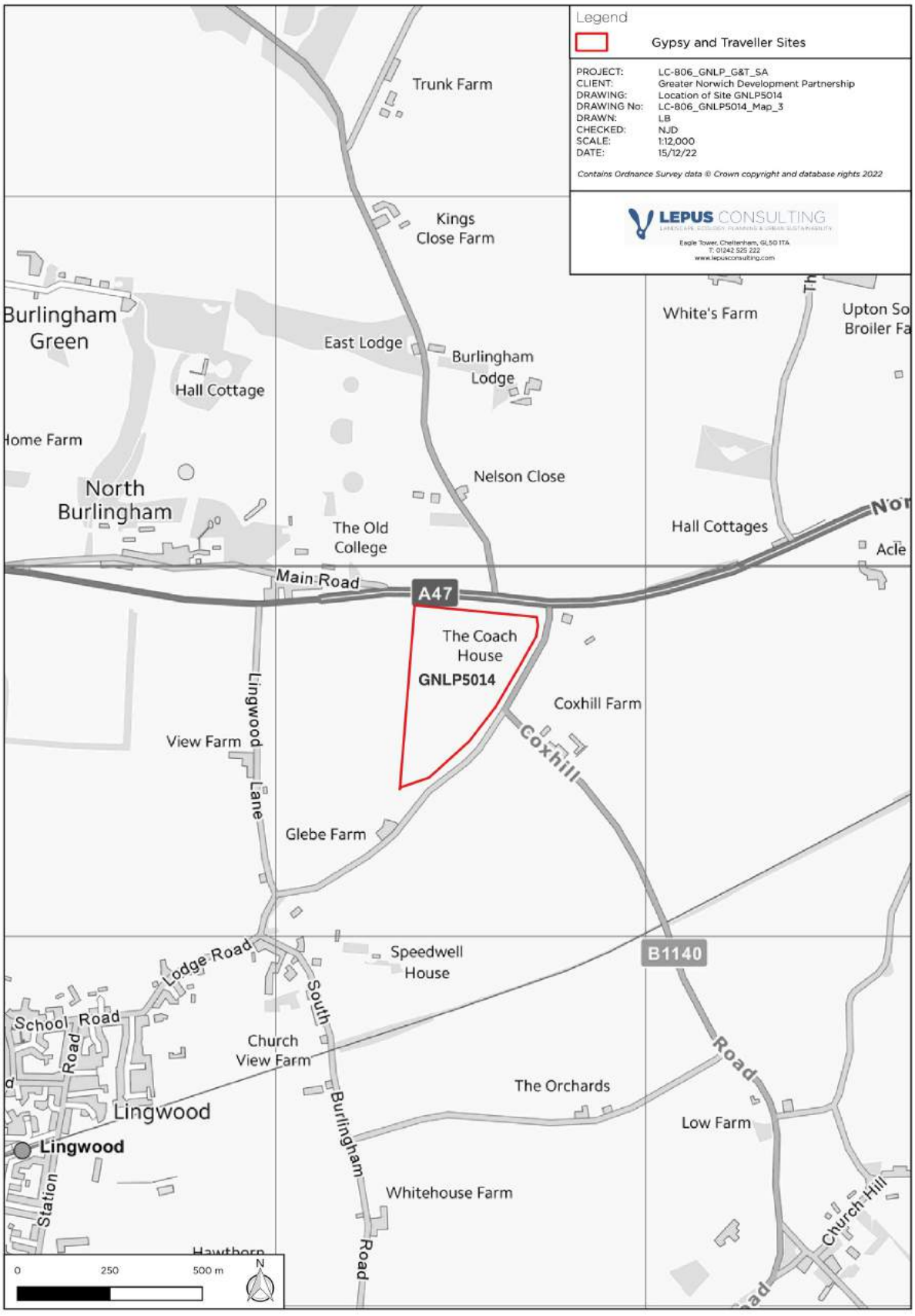


Figure 3.6: *Location of proposed Gypsy and Traveller Site GNLP5014*

Site GNLP5014: Site information and overall scores per SA Objective (pre-mitigation)

Site Name	Area (ha)	Proposed No. of Pitches
Land adjacent to A47	1ha of 11.09ha larger site	15

SA Objective														
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
-	+	0	-	+	-	0	--	0	--	+	-	0	-	0

SA1: Air Quality and Noise

3.7.1 **Main Road:** The A47 passes to the north of Site GNLP5014, with the majority of the site within 200m of this main road. The proposed development at this site could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using the A47 would be expected to have a minor negative impact on air quality and noise at this site.

SA2: Climate Change Mitigation and Adaptation

3.7.2 **Fluvial Flooding:** Site GNLP5014 is located wholly within Flood Zone 1. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

SA3: Biodiversity, Geodiversity and Green Infrastructure

3.7.3 **Habitats Sites**: Site GNLP5014 is located approximately 2.5km from 'Broadland' SPA/Ramsar and 'The Broads' SAC, at its closest point. The site is also located approximately 17.5km from 'River Wensum' SAC, and 7.5km from 'Breydon Water' SPA/Ramsar. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

3.7.4 **SSSI IRZ**: Site GNLP5014 is located within an IRZ which states that "*Any discharge of water or liquid waste of more than 5m³/day to ground (i.e. to seep away) or to surface water, such as a beck or stream*". It is uncertain at this stage whether the proposed Gypsy and Traveller development would exceed this threshold, and consequently whether adverse impacts on nearby SSSIs would occur.

SA4: Landscape

3.7.5 **Landscape Character:** Site GNLP5014 is located within the LCA 'Blofield Tributary Farmland'. Some key characteristics of this LCA include the landscape setting of historic halls and churches, villages, and mosaic of arable fields with views to features. Site GNLP5014 comprises part of the open arable landscape surrounding Lingwood and Burlingham Green. The proposed development at this site could potentially be discordant with these key characteristics and would be expected to have a minor negative impact on the local landscape character.

3.7.6 **Urbanisation of the Countryside:** Site GNLP5014 comprises previously undeveloped land and is located outside of the existing settlements of Lingwood and Burlingham Green. Therefore, the proposed development at this site could potentially contribute towards the urbanisation of the countryside. A minor negative impact on the local landscape would be expected.

SA5: Housing

3.7.7 **Provision of Pitches:** Site GNLP5014 is proposed for the development of 15 Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

SA6: Population and Communities

3.7.8 **Local Services:** The nearest local shop to Site GNLP5014 is SPAR in Lingwood, located approximately 2km to the south west of the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

SA7: Deprivation

3.7.9 See **Table 2.4,** 'SA7: Deprivation'.

SA8: Health

3.7.10 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5014 is James Paget University Hospital, located approximately 16km from the site, outside the sustainable target distance. The proposed development at Site GNLP5014 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.

3.7.11 **GP Surgery:** Site GNLP5014 is located approximately 1.2km from the closest GP surgery, 'Dr Rolls & Partners' in Acle, outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.

3.7.12 **Leisure Facilities:** The closest leisure centre to Site GNLP5014 is 'Riverside Leisure Centre' in Norwich City, located approximately 13.5km from the site. Site GNLP5014 is located outside of the target distance to this leisure facility, and therefore a minor negative impact on the health and wellbeing of site end users would be expected.

3.7.13 **Main Road:** Site GNLP5014 is located adjacent to the A47. The proposed development at this site could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users.

3.7.14 **Green Network:** The majority of Site GNLP5014 is located within 600m from public greenspace, including religious grounds and a bowling green. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

3.7.15 As Site GNLP5014 is located outside the target distance to an NHS hospital, GP surgery and leisure centre, the proposed development at this site would be expected to have a major negative impact on the health and wellbeing of site end users.

SA9: Crime

3.7.16 See **Table 2.4,** 'SA9: Crime'.

SA10: Education

3.7.17 **Primary/Secondary School:** Site GNLP5014 is located approximately 1.5km from the closest primary school, Lingwood Primary School. The site is also located approximately 2.3km from the closest secondary school, Acle Academy. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

SA11: Economy

3.7.18 **Primary Employment Location:** Site GNLP5014 is located approximately 3km from the market town of Acle, which would be expected to provide a range of employment opportunities for site end users and is within the sustainable target distance. Therefore, a minor positive impact on the local economy would be expected.

SA12: Transport and Access to Services

3.7.19 **Bus Stop:** Site GNLP5014 is located outside the target distance to a bus stop. The closest bus stops can be found in Lingwood, including a bus stop along Station Road approximately 1.3km from the site, which provides regular service '15A' to Wymondham. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.

3.7.20 **Railway Station:** Site GNLP5014 is located within the target distance to Lingwood Railway Station. The proposed development at this site would be likely to have a minor positive impact on the access of site end users to rail services.

3.7.21 **Pedestrian Access:** Site GNLP5014 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.

3.7.22 **Road Network:** Site GNLP5014 is well connected to the existing road network. The proposed development would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

SA13: Historic Environment

3.7.23 **Heritage Assets:** The development proposed at Site GNLP5014 would be unlikely to significantly impact any surrounding heritage assets, and therefore, would be expected to have a negligible impact on the local historic environment.

SA14: Natural Resources, Waste and Contaminated Land

3.7.24 **Previously Developed Land:** Site GNLP5014 comprises 11.09ha of previously undeveloped land, with the proposed development to occupy approximately 1.00ha of this. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

3.7.25 **ALC:** Site GNLP5014 is situated upon ALC Grade 1 land which represents some of Greater Norwich's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this important natural resource.

SA15: Water

3.7.26 **Water Quality:** Site GNLP5014 is located over 200m from a watercourse and does not coincide with a groundwater SPZ. Therefore, the proposed development at this site would be expected to have a negligible impact on local water receptors considered in this assessment. However, it should be noted that the emerging HRA will explore potential for wider water quality issues relating to nutrient thresholds (see SA3: Biodiversity).

3.8 Site GNLP5019 – Land at Woodland Stable, Shortthorn Road, Stratton Strawless

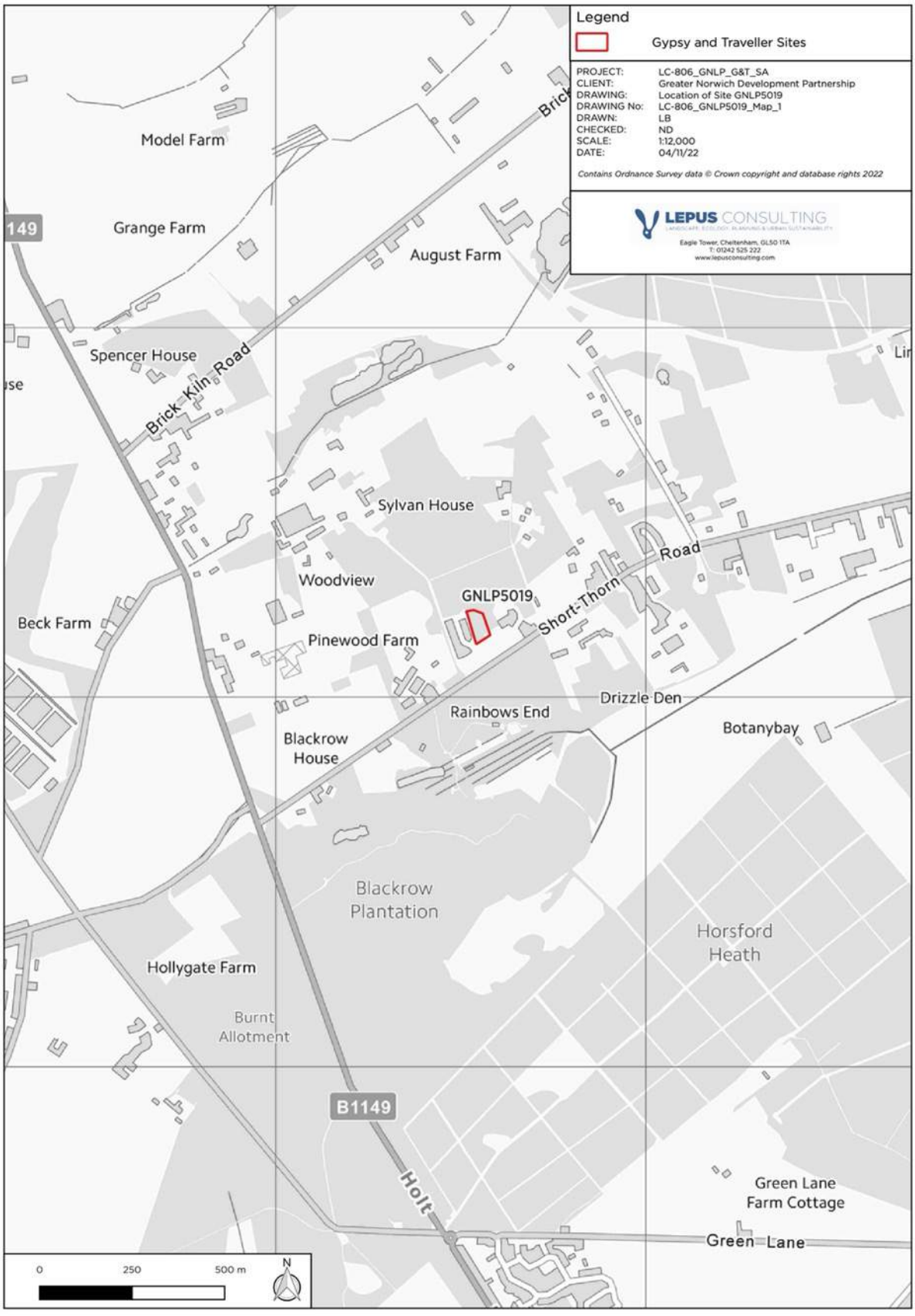


Figure 3.7: *Location of proposed Gypsy and Traveller Site GNLP5019*

Site GNLP5019: Site information and overall scores per SA Objective (pre-mitigation)

Site Name	Area (ha)	Proposed No. of Pitches
Land at Woodland Stable, Shortthorn Road, Stratton Strawless	0.33	4

SA Objective														
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
0	-	-	0	+	-	0	--	0	--	+	--	0	-	0

SA1: Air Quality and Noise

3.8.1 **Air and Noise Pollution:** Site GNLP5019 is proposed for small-scale development (four Gypsy and Traveller pitches) and is situated away from major sources of air and noise pollution. A negligible impact on local air quality and noise would be expected.

SA2: Climate Change Mitigation and Adaptation

3.8.2 **Fluvial Flooding:** Site GNLP5019 is located wholly within Flood Zone 1. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

3.8.3 **Surface Water Flooding:** A small proportion of Site GNLP5019 in the south coincides with an area determined to be at low risk of surface water flooding. The proposed development at this site could potentially have a minor negative impact on surface water flood risk, as development could potentially locate some site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

SA3: Biodiversity, Geodiversity and Green Infrastructure

3.8.4 **Habitats Sites**: Site GNLP5019 is located approximately 2.3km from 'Norfolk Valley Fens' SAC, 5.6km from 'River Wensum' SAC and 7.8km from 'Broadland' SPA/Ramsar and 'The Broads' SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

3.8.5 **SSSI IRZ**: Site GNLP5019 is located within a Nutrient Impact Area, within an IRZ which states that "*for new development with overnight accommodation Reg 63 of the Conservation of Habitats and Species Regulations 2017 must be applied and additional measures required. LPA to refer to Natural England's Nutrient Neutrality advice*". A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

SA4: Landscape

3.8.6 **Landscape Character:** Site GNLP5019 is located within the LCA 'Horsford Woodland Heath Mosaic'. Some key characteristics of this LCA include extensive blocks of woodland, remnant patches of heathland and fen, and small-scale settlement. Site GNLP5019 comprises a small are of scrub / trees, situated adjacent to an existing Gypsy and Traveller site, and bounded by woodland to the north. The proposed development of four Gypsy and Traveller pitches at this site would be unlikely to significantly affect any of these identified key characteristics, and therefore, a negligible impact on the landscape character would be expected.

SA5: Housing

3.8.7 **Provision of Pitches:** Site GNLP5019 is proposed for the development of four Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

SA6: Population and Communities

3.8.8 **Local Services:** The nearest local shop to Site GNLP5019 is Co-op in Horsford, located approximately 3.2km from the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

SA7: Deprivation

3.8.9 See **Table 2.4,** 'SA7: Deprivation'.

SA8: Health

3.8.10 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5019 is Norfolk and Norwich University Hospital, located approximately 12km from the site, outside the sustainable target distance. The proposed development at Site GNLP5019 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.

3.8.11 **GP Surgery:** Site GNLP5019 is located approximately 2.6km from the closest GP surgery, 'Dr O'Neil' in Horsford, outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.

3.8.12 **Leisure Facilities:** The closest leisure centre to Site GNLP5019 is 'Riverside Leisure Centre', located approximately 12.5km from the site. Site GNLP5019 is located outside of the target distance to this leisure facility, and therefore a minor negative impact on the health and wellbeing of site end users would be expected.

3.8.13 **Main Road:** Site GNLP5019 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.

3.8.14 **Green Network:** Site GNLP5019 is located within 600m from public greenspace, including a cemetery. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

3.8.15 As Site GNLP5019 is located outside the target distance to an NHS hospital, GP surgery and leisure centre, the proposed development at this site would be expected to have a major negative impact on the health and wellbeing of site end users.

SA9: Crime

3.8.16 See **Table 2.4,** 'SA9: Crime'.

SA10: Education

3.8.17 **Primary/Secondary School:** Site GNLP5019 is located approximately 2.1km from the closest primary school, Hevingham Primary School. The site is also located approximately 5.4km from the closest secondary school, Taverham High School. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

SA11: Economy

3.8.18 **Primary Employment Location:** Site GNLP5019 is located approximately 500m from Woodland Park Industrial Estate, and approximately 5km from Taverham in the outskirts of Norwich. These areas would be expected to provide a range of employment opportunities for site end users, within the sustainable target distance. Therefore, a minor positive impact on the local economy would be expected.

SA12: Transport and Access to Services

3.8.19 **Bus Stop:** Site GNLP5019 is located outside the target distance to a bus stop. The closest bus stop is located approximately 800m from the site on Shortthorn Road and provides regular service '43A' and '45B' from Holt to Norwich City Centre. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.

3.8.20 **Railway Station:** Site GNLP5019 is located outside the target distance to a railway station, with the nearest being Norwich Station situated approximately 12km to the south east. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.

3.8.21 **Pedestrian Access:** Site GNLP5019 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.

3.8.22 **Road Network:** Site GNLP5019 is not accessible from the current road network. Therefore, the proposed development at this site could potentially result in a minor negative impact on accessibility.

3.8.23 Site GNLP5019 is located outside of the sustainable target distance to a bus stop and railway station and is poorly connected to the current road and footpath networks. Therefore, a major negative impact on travel and accessibility would be expected at this site.

SA13: Historic Environment

3.8.24 **Heritage Assets:** The development proposed at Site GNLP5019 would be unlikely to significantly impact any surrounding heritage assets, and therefore, would be expected to have a negligible impact on the local historic environment.

SA14: Natural Resources, Waste and Contaminated Land

3.8.25 **Previously Developed Land:** Site GNLP5019 is located upon 0.33ha of previously undeveloped land. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

3.8.26 **ALC:** Site GNLP5019 is situated on land which is classed as 'non-agricultural' ALC. A minor positive impact would therefore be expected as development at this site would be likely to help prevent the loss of BMV land across the Plan area.

SA15: Water

3.8.27 **Water Quality:** Site GNLP5019 is located over 200m from a watercourse and does not coincide with a groundwater SPZ. Therefore, the proposed development at this site would be expected to have a negligible impact on local water receptors considered in this assessment. However, it should be noted that the emerging HRA will explore potential for wider water quality issues relating to nutrient thresholds (see SA3: Biodiversity).

3.9 Site GNLP5020 – Land at Romany Meadow, The Turnpike, Carleton Rode

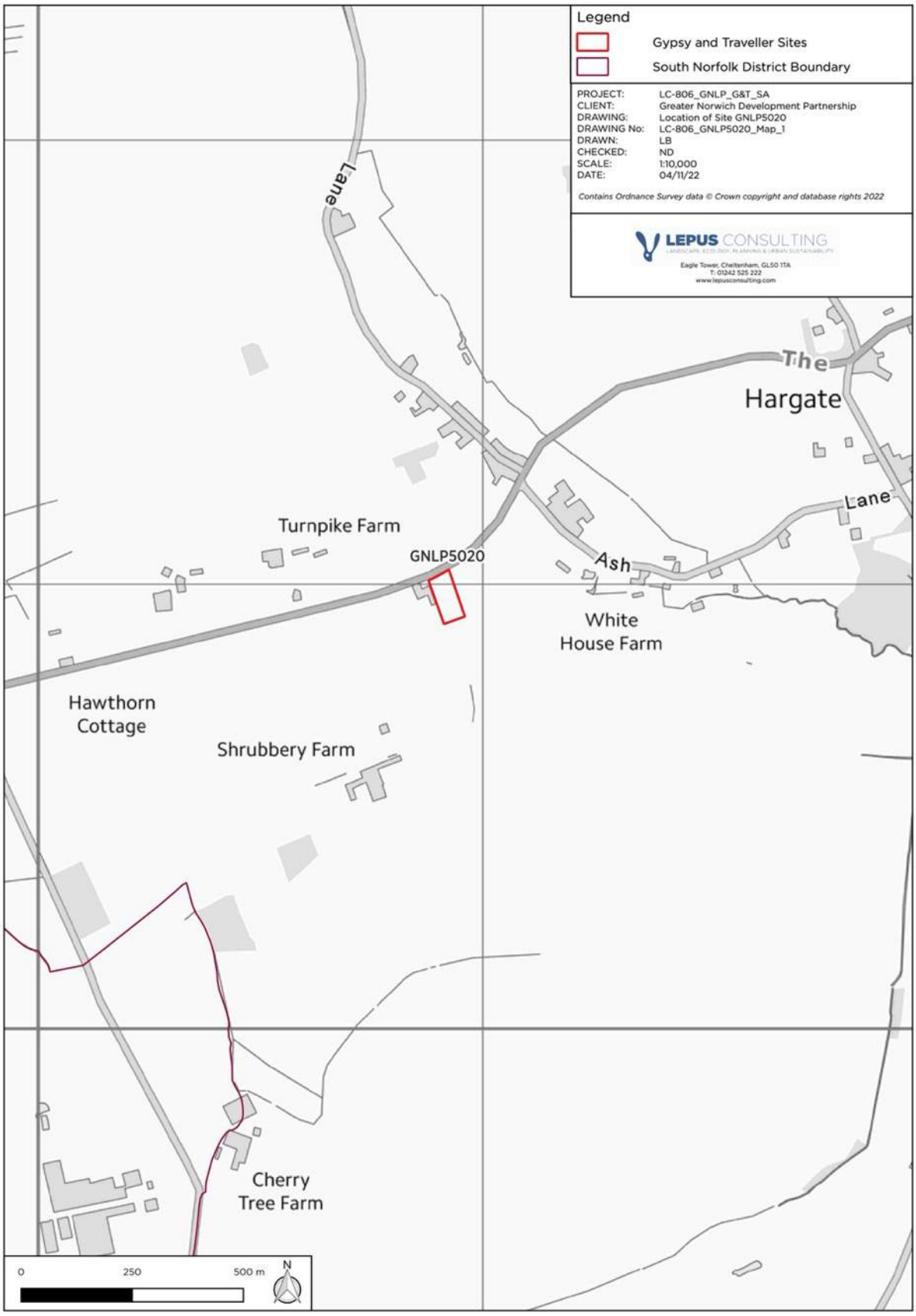


Figure 3.8: *Location of proposed Gypsy and Traveller Site GNLP5020*

Site GNLP5020: Site information and overall scores per SA Objective (pre-mitigation)

Site Name	Area (ha)	Proposed No. of Pitches
Land at Romany Meadow, The Turnpike, Carleton Rode	0.54	6

SA Objective														
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
0	-	-	0	+	-	0	--	0	--	-	-	0	-	-

SA1: Air Quality and Noise

3.9.1 **Air and Noise Pollution:** Site GNLP5020 is proposed for small-scale development (six Gypsy and Traveller pitches) and is situated away from major sources of air and noise pollution. A negligible impact on local air quality and noise would be expected.

SA2: Climate Change Mitigation and Adaptation

3.9.2 **Fluvial Flooding:** Site GNLP5020 is located wholly within Flood Zone 1. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

3.9.3 **Surface Water Flooding:** A large proportion of Site GNLP5020 in the south coincides with an area determined to be at low risk of surface water flooding, and a small proportion of the site in the east is within an area of medium risk. The proposed development at this site could potentially have a minor negative impact on surface water flood risk, as development could potentially locate some site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

SA3: Biodiversity, Geodiversity and Green Infrastructure

3.9.4 **Habitats Sites**: Site GNLP5020 is located approximately 9.2km from 'Norfolk Valley Fens' SAC, 11km from 'Waveney & Little Ouse Valley Fens' SAC and 'Redgrave & South Lopham Fens' Ramsar site. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

3.9.5 **SSSI IRZ**: Site GNLP5020 is located within a Nutrient Impact Area, within an IRZ which states that "*for new development with overnight accommodation Reg 63 of the Conservation of Habitats and Species Regulations 2017 must be applied and additional measures required. LPA to refer to Natural England's Nutrient Neutrality advice*". A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

SA4: Landscape

3.9.6 **Landscape Character:** Site GNLP5020 is located within the LCA 'Tas Tributary Farmland'. Some key characteristics of this LCA include large, open arable fields, blocks of woodland and open views. Site GNLP5020 comprises a small field, enclosed by hedgerows and trees, adjacent to an existing Gypsy and Traveller site. The proposed development of six Gypsy and Traveller pitches at this site would be unlikely to affect any of these identified key characteristics, and therefore, a negligible impact on the landscape character would be expected.

SA5: Housing

3.9.7 **Provision of Pitches:** Site GNLP5020 is proposed for the development of six Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

SA6: Population and Communities

3.9.8 **Local Services:** The nearest local shop to Site GNLP5020 is Kings Stores in New Buckenham, located approximately 2.2km to the west of the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

SA7: Deprivation

3.9.9 See **Table 2.4,** 'SA7: Deprivation'.

SA8: Health

3.9.10 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5020 is Norfolk and Norwich University Hospital, located approximately 17.5km from the site, outside the sustainable target distance. The proposed development at Site GNLP5020 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.

3.9.11 **GP Surgery:** Site GNLP5020 is located approximately 5.5km from the closest GP surgery, 'Dr Rolls & Partners' in Sneath Common, outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.

3.9.12 **Leisure Facilities:** The closest leisure centre to Site GNLP5020 is 'Long Stratton Leisure Centre', located approximately 8.6km from the site. Site GNLP5020 is located outside of the target distance to this leisure facility, and therefore a minor negative impact on the health and wellbeing of site end users would be expected.

3.9.13 **Main Road:** Site GNLP5020 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.

3.9.14 **Green Network:** Site GNLP5020 is located within 600m from the PRoW network. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

3.9.15 As Site GNLP5020 is located outside the target distance to an NHS hospital, GP surgery and leisure centre, the proposed development at this site would be expected to have a major negative impact on the health and wellbeing of site end users.

SA9: Crime

3.9.16 See **Table 2.4,** 'SA9: Crime'.

SA10: Education

3.9.17 **Primary/Secondary School:** Site GNLP5020 is located approximately 1.5km from the closest primary school, Carleton Rode C of E VA Primary School. The site is also located approximately 4.2km from the closest secondary school, Old Buckenham High School. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

SA11: Economy

3.9.18 **Primary Employment Location:** Site GNLP5020 is located in a rural area, with the closest primary employment locations being the market town of Wymondham to the north, and Diss to the south, over 5km from the site and outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to employment.

SA12: Transport and Access to Services

3.9.19 **Bus Stop:** Site GNLP5020 is located outside the target distance to a bus stop. The closest bus stop is located approximately 1km from the site on Fen Road and provides regular service '37A' from East Harling to Norwich City Centre. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.

3.9.20 **Railway Station:** Site GNLP5020 is located outside the target distance to a railway station, with the nearest being Spooner Row Station situated approximately 6.5km to the north. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.

3.9.21 **Pedestrian Access:** Site GNLP5020 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.

3.9.22 **Road Network:** Site GNLP5020 is well connected to the existing road network. The proposed development would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

SA13: Historic Environment

3.9.23 **Heritage Assets:** The development proposed at Site GNLP5020 would be unlikely to significantly impact any surrounding heritage assets, and therefore, would be expected to have a negligible impact on the local historic environment.

SA14: Natural Resources, Waste and Contaminated Land

3.9.24 **Previously Developed Land:** Site GNLP5020 is located upon 0.54ha of previously undeveloped land. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

3.9.25 **ALC:** Site GNLP5020 is situated upon ALC Grade 3 land which could potentially represent some of Greater Norwich's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this important natural resource.

SA15: Water

3.9.26 **SPZ:** Site GNLP5020 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.

3.10 Site GNLP5021 – The Old Produce Shop, Holt Road, Horsford

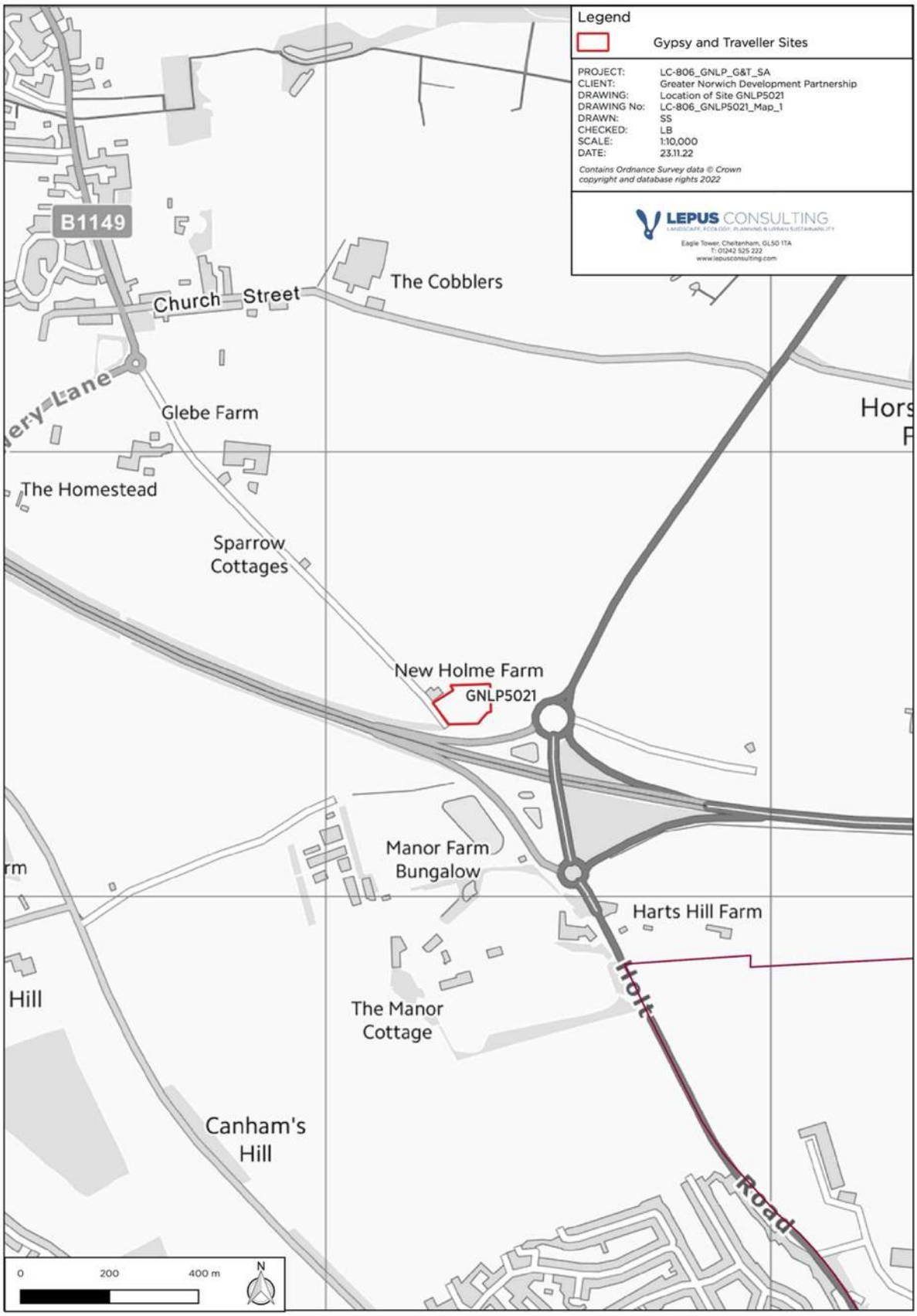


Figure 3.9: *Location of proposed Gypsy and Traveller Site GNLP5021*

Site GNLP5021: Site information and overall scores per SA Objective (pre-mitigation)

Site Name	Area (ha)	Proposed No. of Pitches
The Old Produce Shop, Holt Road, Horsford	0.90	6

SA Objective														
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
-	+	-	0	+	-	0	--	0	--	+	-	0	-	-

SA1: Air Quality and Noise

3.10.1 **Main Road:** Site GNLP5021 is located adjacent to the A1270/A140 roundabout, with the entirety of the site within 200m of these main roads. The proposed development at this site could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using the A1270 and A140 would be expected to have a minor negative impact on air quality and noise at this site.

SA2: Climate Change Mitigation and Adaptation

3.10.2 **Fluvial Flooding:** Site GNLP5021 is located wholly within Flood Zone 1. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

SA3: Biodiversity, Geodiversity and Green Infrastructure

3.10.3 **Habitats Sites**: Site GNLP5021 is located approximately 7.5km from 'Norfolk Valley Fens' SAC, 2.3km from 'River Wensum' SAC and 6km from 'Broadland' SPA/Ramsar and 'The Broads' SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

3.10.4 **SSSI IRZ**: Site GNLP5021 is located within a Nutrient Impact Area, within an IRZ which states that "*for new development with overnight accommodation Reg 63 of the Conservation of Habitats and Species Regulations 2017 must be applied and additional measures required. LPA to refer to Natural England's Nutrient Neutrality advice*". A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

SA4: Landscape

3.10.5 **Landscape Character:** Site GNLP5021 is located within the LCA 'Spixworth Wooded Estatelands'. Some key characteristics of this LCA include blocks of woodland and hedgerows, and the landscape setting of villages, historic houses and halls. Due to the expected small-scale development (six Gypsy and Traveller pitches) situated adjacent to existing rural buildings and the Broadland Northway roundabout, it is not anticipated that development proposals would be discordant with this LCA. Therefore, a negligible impact on the landscape character would be expected.

SA5: Housing

3.10.6 **Provision of Pitches:** Site GNLP5021 is proposed for the development of six Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

SA6: Population and Communities

3.10.7 **Local Services:** The nearest local shop to Site GNLP5021 is St Faiths Post Office and Stores, located approximately 1.4km to the north east of the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

3.10.8 **Local Landscape Designations:** Site GNLP5021 is located within 600m from outdoor sports facilities (Horsford Manor Cricket Ground). The proposed development at this site could potentially provide site end users with good access to this asset, and as such, result in a minor positive impact on opportunities for integration with the local community.

SA7: Deprivation

3.10.9 See **Table 2.4,** 'SA7: Deprivation'.

SA8: Health

3.10.10 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5021 is Norfolk and Norwich University Hospital, located approximately 7.6km from the site, outside the sustainable target distance. The proposed development at Site GNLP5021 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.

3.10.11 **GP Surgery:** Site GNLP5021 is located approximately 1.4km from the closest GP surgery, 'Dr Stone & Partners' in Hellesdon, outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.

3.10.12 **Leisure Facilities:** The closest leisure centre to Site GNLP5021 is 'Riverside Leisure Centre', located approximately 7.5km from the site. Site GNLP5021 is located outside of the target distance to this leisure facility, and therefore a minor negative impact on the health and wellbeing of site end users would be expected.

3.10.13 **Main Road:** Site GNLP5021 is located adjacent to the A1270/A140 roundabout. The proposed development at this site could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users.

3.10.14 **Green Network:** Site GNLP5021 is located within 600m from public greenspace, including a playing field. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

3.10.15 As Site GNLP5021 is located outside the target distance to an NHS hospital, GP surgery and leisure centre, the proposed development at this site would be expected to have a major negative impact on the health and wellbeing of site end users.

SA9: Crime

3.10.16 See **Table 2.4,** 'SA9: Crime'.

SA10: Education

3.10.17 **Primary/Secondary School:** Site GNLP5021 is located approximately 1.3km from the closest primary school, Arden Grove Infant and Nursery School, and approximately 2km from the nearest school providing education for all primary ages, St Faiths C of E VC Primary School. The site is also located approximately 2.6km from the closest secondary school, Hellesdon High School. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

SA11: Economy

3.10.18 **Primary Employment Location:** Site GNLP5021 is located within 5km from a range of employment opportunities in the north of Norwich City, including Norwich Airport and various industrial and commercial areas, which would be expected to provide a range of employment opportunities for site end users and are within the sustainable target distance. Therefore, a minor positive impact on the local economy would be expected.

SA12: Transport and Access to Services

3.10.19 **Bus Stop:** Site GNLP5021 is located outside the target distance to a bus stop. The closest bus stop is located approximately 1.2km from the site on Holt Road and provides regular services including '36' from Horsford to Norwich City Centre. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.

3.10.20 **Railway Station:** Site GNLP5021 is located outside the target distance to a railway station, with the nearest being Norwich Railway Station situated over 7km to the south east. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.

3.10.21 **Pedestrian Access:** Site GNLP5021 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.

3.10.22 **Road Network:** Site GNLP5021 is well connected to the existing road network. The proposed development would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

SA13: Historic Environment

3.10.23 **Heritage Assets:** The development proposed at Site GNLP5021 would be unlikely to significantly impact any surrounding heritage assets, and therefore, would be expected to have a negligible impact on the local historic environment.

SA14: Natural Resources, Waste and Contaminated Land

3.10.24 **Previously Developed Land:** Site GNLP5021 comprises 0.90ha, the majority of which is previously undeveloped land. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

3.10.25 **ALC:** Site GNLP5021 is situated upon ALC Grade 3 land which could potentially represent some of Greater Norwich's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this important natural resource.

SA15: Water

3.10.26 **SPZ:** Site GNLP5021 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.

3.11 Site GNLP5022 – The Oaks, Foulsham

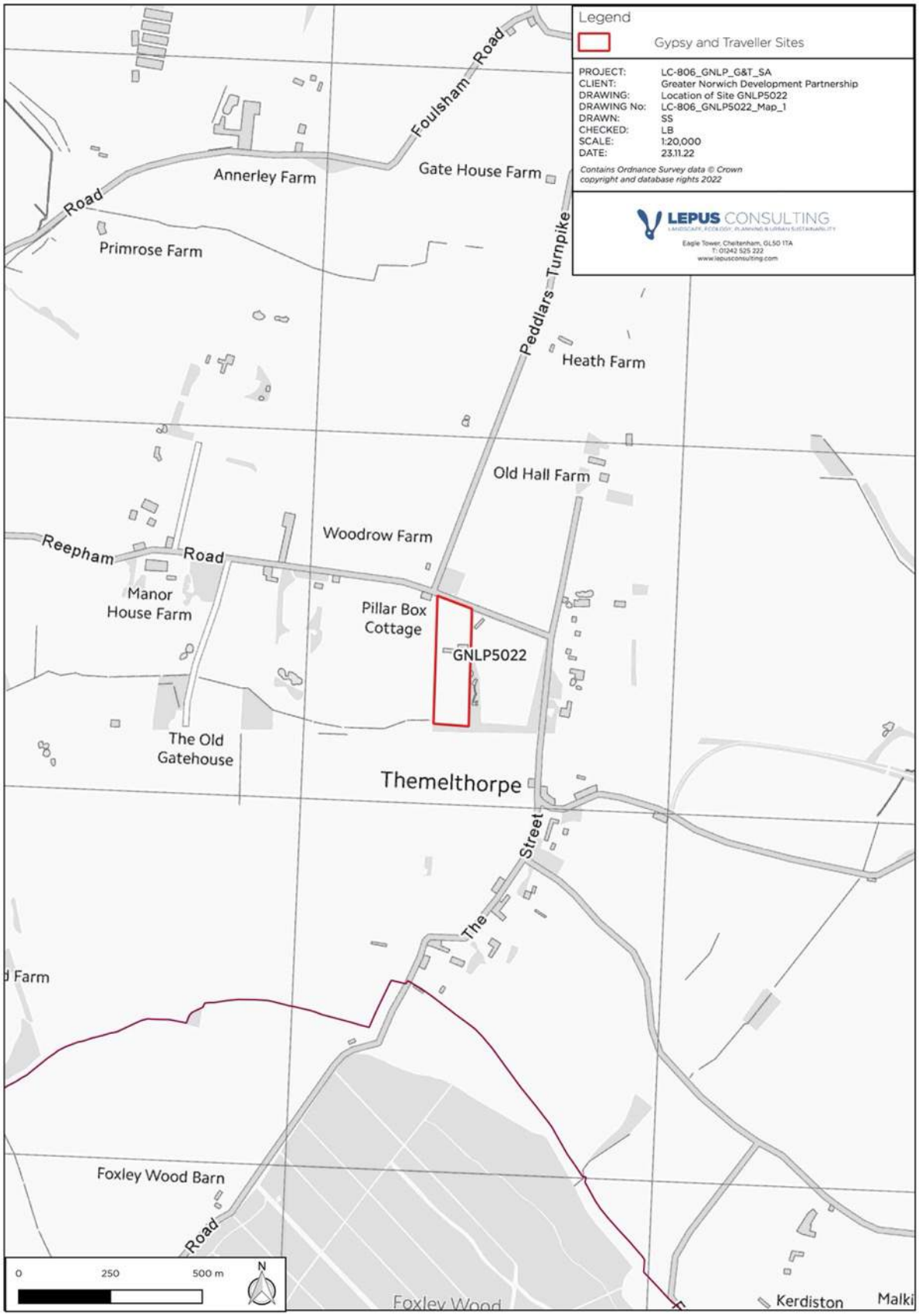


Figure 3.10: *Location of proposed Gypsy and Traveller Site GNLP5022*

Site GNLP5022: Site information and overall scores per SA Objective (pre-mitigation)

Site Name	Area (ha)	Proposed No. of Pitches
The Oaks, Foulsham	3.19	5

SA Objective														
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
0	-	-	0	+	-	0	--	0	--	+	-	0	-	-

SA1: Air Quality and Noise

3.11.1 **Air and Noise Pollution:** Site GNLP5022 is proposed for small-scale development (five Gypsy and Traveller pitches) and is situated away from major sources of air and noise pollution. A negligible impact on local air quality and noise would be expected.

SA2: Climate Change Mitigation and Adaptation

3.11.2 **Fluvial Flooding:** Site GNLP5022 is located wholly within Flood Zone 1. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

3.11.3 **Surface Water Flooding:** A small proportion of Site GNLP5022 in the south coincides with an area determined to be at low risk of surface water flooding. The proposed development at this site could potentially have a minor negative impact on surface water flood risk, as development could potentially locate some site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

SA3: Biodiversity, Geodiversity and Green Infrastructure

3.11.4 **Habitats Sites**: Site GNLP5022 is located approximately 5.6km from 'Norfolk Valley Fens' SAC, 4.8km from 'River Wensum' SAC and 21km from 'Broadland' SPA/Ramsar and 'The Broads' SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

3.11.5 **SSSI IRZ**: Site GNLP5022 is located within a Nutrient Impact Area, within an IRZ which states that "*for new development with overnight accommodation Reg 63 of the Conservation of Habitats and Species Regulations 2017 must be applied and additional measures required. LPA to refer to Natural England's Nutrient Neutrality advice*". A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

SA4: Landscape

3.11.6 **Landscape Character:** Site GNLP5022 is located within the LCA 'Foulsham and Reepham Plateau Farmland'. Some key characteristics of this LCA include the distinctive field pattern, wide views to churches and the setting of manors, halls and churches. Due to the expected small-scale development (five Gypsy and Traveller pitches) situated adjacent to an existing Gypsy and Traveller site, it is not anticipated that development proposals would be discordant with this LCA. Therefore, a negligible impact on the landscape character would be expected.

SA5: Housing

3.11.7 **Provision of Pitches:** Site GNLP5022 is proposed for the development of five Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

SA6: Population and Communities

3.11.8 **Local Services:** The nearest local shop to Site GNLP5022 is The Village Store in Foulsham, located approximately 2.2km to the north west of the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

SA7: Deprivation

3.11.9 See **Table 2.4,** 'SA7: Deprivation'.

SA8: Health

3.11.10 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5022 is Norfolk and Norwich University Hospital, located approximately 21.5km from the site, outside the sustainable target distance. The proposed development at Site GNLP5022 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.

3.11.11 **GP Surgery:** Site GNLP5022 is located approximately 4.5km from the closest GP surgery, 'Reepham Surgery', outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.

3.11.12 **Leisure Facilities:** The closest leisure centre to Site GNLP5022 is 'Dereham Leisure Centre', located approximately 13km from the site. Site GNLP5022 is located outside of the target distance to this leisure facility, and therefore a minor negative impact on the health and wellbeing of site end users would be expected.

3.11.13 **Main Road:** Site GNLP5022 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.

3.11.14 **Green Network:** Site GNLP5022 is located within 600m from public greenspace, including religious grounds. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

3.11.15 As Site GNLP5022 is located outside the target distance to an NHS hospital, GP surgery and leisure centre, the proposed development at this site would be expected to have a major negative impact on the health and wellbeing of site end users.

SA9: Crime

3.11.16 See **Table 2.4,** 'SA9: Crime'.

SA10: Education

3.11.17 **Primary/Secondary School:** Site GNLP5022 is located approximately 2.2km from the closest primary school, Foulsham Primary School. The site is also located approximately 4.6km from the closest secondary school, Reepham High School. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

SA11: Economy

3.11.18 **Primary Employment Location:** Site GNLP5022 is located approximately 4.8km from the market town of Reepham, which would be expected to provide a range of employment opportunities for site end users and is within the sustainable target distance. Therefore, a minor positive impact on the local economy would be expected.

SA12: Transport and Access to Services

3.11.19 **Bus Stop:** Site GNLP5022 is located outside the target distance to a bus stop. The closest bus stop is located approximately 2.2km from the site on Station Road and provides service '80' to Dereham and '98' to Fakenham. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.

3.11.20 **Railway Station:** Site GNLP5022 is located outside the target distance to a railway station, with the nearest being Sheringham Railway Station situated over 21km to the north east, and Norwich Railway Station situated over 24km to the south east. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.

3.11.21 **Pedestrian Access:** Site GNLP5022 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.

3.11.22 **Road Network:** Site GNLP5022 is well connected to the existing road network. The proposed development would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

SA13: Historic Environment

3.11.23 **Grade II* Listed Building:** Site GNLP5022 is located approximately 330m from the Grade II* Listed Building 'Church of St Andrew'. This Listed Building is situated amongst the existing settlement and surrounded by trees. Due to these factors, and the expected small number of pitches at this existing Gypsy and Traveller site, it is not anticipated that it would affect the setting of this Listed Building. Therefore, the proposed development at this site would be expected to result in a negligible impact on the historic environment.

3.11.24 **Grade II Listed Building:** Site GNLP5022 is located approximately 290m from the Grade II Listed Building 'The Old Hall'. This Listed Building is situated amongst the existing settlement and surrounded by trees. Due to these factors, and the expected small number of pitches at this existing Gypsy and Traveller site, it is not anticipated that it would affect the setting of this Listed Building. Therefore, the proposed development at this site would be expected to result in a negligible impact on the historic environment.

SA14: Natural Resources, Waste and Contaminated Land

3.11.25 **Previously Developed Land:** Site GNLP5022 comprises 3.19ha, the majority of which is previously undeveloped land. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

3.11.26 **ALC:** Site GNLP5022 is situated upon ALC Grade 3 land which could potentially represent some of Greater Norwich's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this important natural resource.

SA15: Water

3.11.27 **SPZ:** Site GNLP5022 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.

3.12 Site GNLP5023 – Strayground Lane, Wymondham

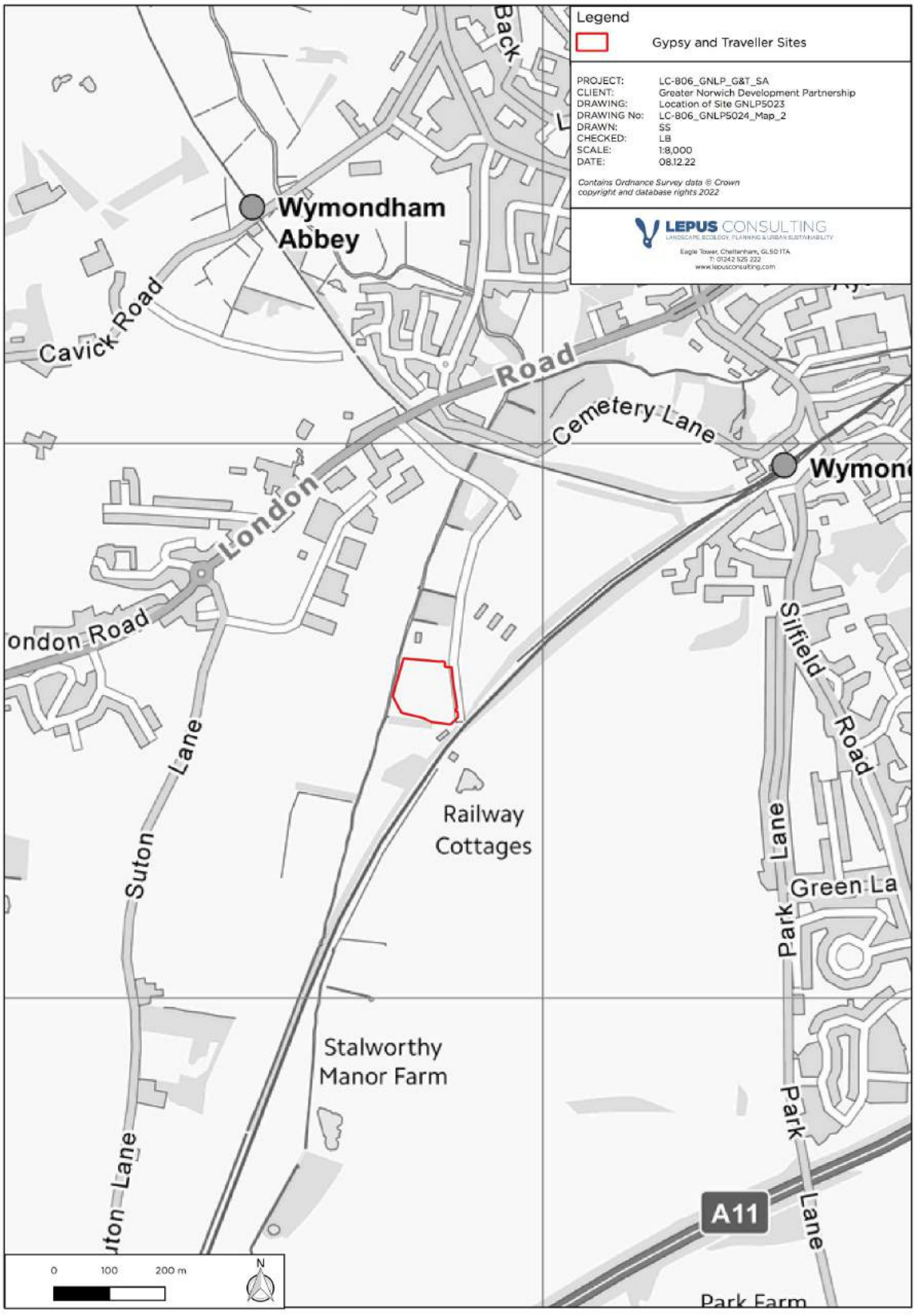


Figure 3.11: Location of proposed Gypsy and Traveller Site GNLP5023

Site GNLP5023: Site information and overall scores per SA Objective (pre-mitigation)

Site Name	Area (ha)	Proposed No. of Pitches
Strayground Lane, Wymondham	1.19	10

SA Objective														
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
-	+	-	-	+	-	0	-	0	--	+	-	0	-	-

SA1: Air Quality and Noise

3.12.1 **Railway Line:** Site GNLP5023 is located within 200m of a railway line, therefore the proposed development at this site could potentially expose site end users to higher levels of noise pollution and vibrations associated with this railway. A minor negative impact would be expected.

SA2: Climate Change Mitigation and Adaptation

3.12.2 **Fluvial Flooding:** Site GNLP5023 is located wholly within Flood Zone 1. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

SA3: Biodiversity, Geodiversity and Green Infrastructure

3.12.3 **Habitats Sites**: Site GNLP5023 is located approximately 8km from 'Norfolk Valley Fens' SAC, 13.4km from 'River Wensum' SAC and 20km from 'Broadland' SPA/Ramsar and 'The Broads' SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

3.12.4 **SSSI IRZ**: Site GNLP5023 is located within a Nutrient Impact Area, within an IRZ which states that "*for new development with overnight accommodation Reg 63 of the Conservation of Habitats and Species Regulations 2017 must be applied and additional measures required. LPA to refer to Natural England's Nutrient Neutrality advice*". A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

3.12.5 **County Wildlife Site**: Site GNLP5023 is located adjacent to 'Bays River Meadow North' CWS. The proposed development at this site could potentially have a minor negative impact on this CWS due to increased development related threats and pressures.

3.12.6 **Priority Habitats:** Site GNLP5023 wholly coincides with lowland fens priority habitat. Therefore, the proposed development at this site would be likely to result in the loss or degradation of this habitat, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.

SA4: Landscape

3.12.7 **Landscape Character:** Site GNLP5023 is located within the LCA 'Tiffey Tributary Farmland'. Some key characteristics of this LCA include large scale arable farmland, water bodies, sparse settlements and long views. Site GNLP5023 comprises previously undeveloped land including trees and hedgerow boundaries, forming part of the undeveloped approach to Wymondham along the Bays River valley. The proposed development at this site could potentially be discordant with the key characteristics of this LCA and would be expected to have a minor negative impact on the local landscape character.

3.12.8 **Urbanisation of the Countryside:** Site GNLP5023 comprises previously undeveloped land and is located outside of Wymondham. Therefore, the proposed development at this site could potentially contribute towards the urbanisation of the countryside. A minor negative impact on the local landscape would be expected.

SA5: Housing

3.12.9 **Provision of Pitches:** Site GNLP5023 is proposed for the development of 10 Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

SA6: Population and Communities

3.12.10 **Local Services:** The nearest local shop to Site GNLP5023 is Co-op, located just over 600m from the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

SA7: Deprivation

3.12.11 See **Table 2.4,** 'SA7: Deprivation'.

SA8: Health

3.12.12 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5023 is Norfolk and Norwich University Hospital, located approximately 9.8km from the site, outside the sustainable target distance. The proposed development at Site GNLP5023 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.

3.12.13 **GP Surgery:** Site GNLP5023 is located approximately 950m from the closest GP surgery, 'Dr Watts' in Wymondham, outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.

3.12.14 **Leisure Facilities:** The closest leisure centre to Site GNLP5023 is 'Wymondham Leisure Centre'. The majority of Site GNLP5023 is located within the 1.5km target distance to this leisure facility, and therefore a minor positive impact on the health and wellbeing of site end users would be expected.

3.12.15 **Main Road:** Site GNLP5023 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.

3.12.16 **Green Network:** Site GNLP5023 is located within 600m from the PRoW network and public greenspace. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

SA9: Crime

3.12.17 See **Table 2.4,** 'SA9: Crime'.

SA10: Education

3.12.18 **Primary/Secondary School:** Site GNLP5023 is located approximately 1km from the closest primary school, Browick Road Primary and Nursery School. The site is also located approximately 1.6km from the closest secondary school, Wymondham High Academy. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

SA11: Economy

3.12.19 **Primary Employment Location:** Site GNLP5023 is located approximately 300m from Wymondham Business Park with many potential employment opportunities for site end users, including businesses 'Express Equine', 'Supreme Bathroom and Kitchen Centre' and 'Abbeygate Accident and Repair', in addition to those expected in Wymondham Town Centre. Therefore, a minor positive impact on the local economy would be expected.

SA12: Transport and Access to Services

3.12.20 **Bus Stop:** The majority of Site GNLP5023 is located outside the 400m target distance to a bus stop. The closest bus stops are found on London Road to the north west and provide regular services '13', '13A', '13B' and '805', including routes to Norwich and the surrounding area. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.

3.12.21 **Railway Station:** Site GNLP5023 is located within the target distance to Wymondham Railway Station. The proposed development at this site would be likely to have a minor positive impact on the access of site end users to rail services.

3.12.22 **Pedestrian Access:** Site GNLP5023 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.

3.12.23 **Road Network:** Site GNLP5023 is well connected to the existing road network. The proposed development would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

SA13: Historic Environment

3.12.24 **Grade II Listed Building:** Site GNLP5023 is located approximately 310m from the Grade II Listed Building 'Ivy Green Villa'. Due to this distance and intervening development (Wymondham Business Park), and the expected small number of pitches at this site, it is not anticipated that it would affect the setting of this Listed Building. Therefore, the proposed development at this site would be expected to result in a negligible impact on the historic environment.

SA14: Natural Resources, Waste and Contaminated Land

3.12.25 **Previously Developed Land:** Site GNLP5023 comprises 1.19ha of previously undeveloped land. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

3.12.26 **ALC:** Site GNLP5023 is situated upon ALC Grade 2 land which represents some of Greater Norwich's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this important natural resource.

SA15: Water

3.12.27 **SPZ:** Site GNLP5023 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.

3.12.28 **Watercourse:** Site GNLP5023 is located adjacent to the Bays River. The proposed development at this site could potentially increase the risk of contamination of this watercourse, and therefore, a minor negative impact would be expected.

3.13 Site GNLP5024 – Land at Upgate Street, Carleton Rode

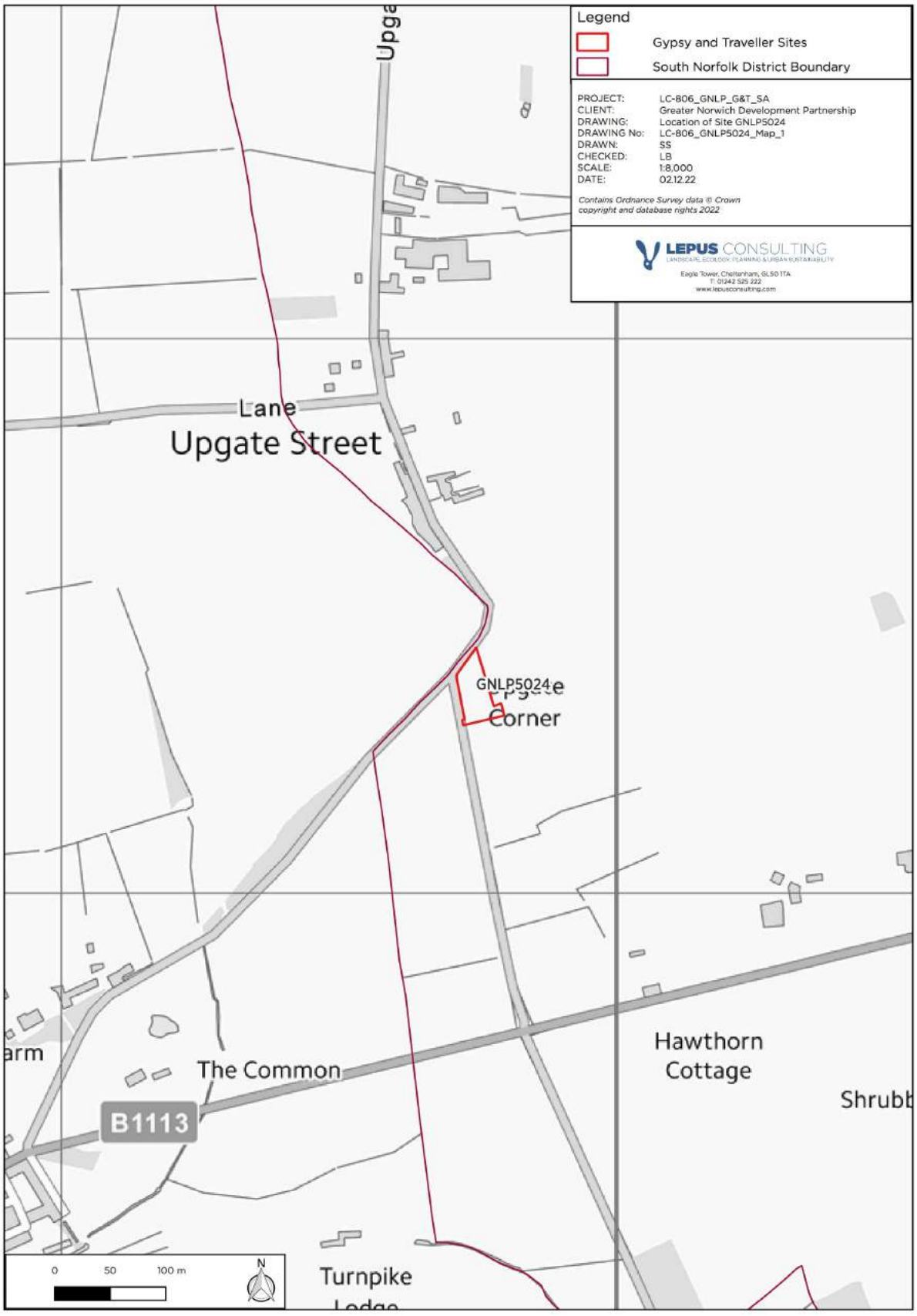


Figure 3.12: Location of proposed Gypsy and Traveller Site GNLP5024

Site GNLP5024: Site information and overall scores per SA Objective (pre-mitigation)

Site Name	Area (ha)	Proposed No. of Pitches
Land at Upgate Street, Carleton Rode	0.62	4

SA Objective														
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
0	-	-	0	+	-	0	--	0	--	-	-	0	-	-

SA1: Air Quality and Noise

3.13.1 **Air and Noise Pollution:** Site GNLP5024 is proposed for small-scale development (four Gypsy and Traveller pitches) and is situated away from major sources of air and noise pollution. A negligible impact on local air quality and noise would be expected.

SA2: Climate Change Mitigation and Adaptation

3.13.2 **Fluvial Flooding:** Site GNLP5024 is located wholly within Flood Zone 1. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

SA3: Biodiversity, Geodiversity and Green Infrastructure

3.13.3 **Habitats Sites**: Site GNLP5024 is located approximately 8.2km from 'Norfolk Valley Fens' SAC, 11.8km from 'Waveney & Little Ouse Valley Fens' SAC and 'Redgrave & South Lopham Fens' Ramsar site and 26km from 'Broadland' SPA/Ramsar and 'The Broads' SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

3.13.4 **SSSI IRZ**: Site GNLP5024 is located approximately 170m from 'New Buckenham Common' SSSI, with the south west of the site lying within an IRZ which states *"Any residential development of 10 or more houses outside existing settlements/urban areas*" should be consulted on with Natural England. The majority of the site is also located within a Nutrient Impact Area, within an IRZ which states that "*for new development with overnight accommodation Reg 63 of the Conservation of Habitats and Species Regulations 2017 must be applied and additional measures required. LPA to refer to Natural England's Nutrient Neutrality advice*". A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

3.13.5 **Priority Habitats:** The north of Site GNLP5024 coincides with approximately 0.08ha of traditional orchard priority habitat; although, aerial photography indicates that this habitat may have since been lost. In absence of site surveys to confirm the quality or extent of the priority habitat, and in line with the precautionary principle, the proposed development at this site could potentially result in the partial loss or degradation of this habitat. A minor negative impact on the overall presence of priority habitats in the Plan area could occur.

SA4: Landscape

3.13.6 **Landscape Character:** Site GNLP5024 is located within the LCA 'Ashwellthorpe Plateau Farmland'. Some key characteristics of this LCA include arable fields, panoramic views and linear settlements along roads. Due to the expected small-scale development (four Gypsy and Traveller pitches) situated within an existing Gypsy and Traveller site, it is not anticipated that development proposals would be discordant with this LCA. Therefore, a negligible impact on the landscape character would be expected.

SA5: Housing

3.13.7 **Provision of Pitches:** Site GNLP5024 is proposed for the development of four Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

SA6: Population and Communities

3.13.8 **Local Services:** The nearest local shop to Site GNLP5024 is Kings Stores in New Buckenham, located approximately 1.3km to the south west of the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

SA7: Deprivation

3.13.9 See **Table 2.4,** 'SA7: Deprivation'.

SA8: Health

3.13.10 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5024 is Norfolk and Norwich University Hospital, located approximately 17.7km from the site, outside the sustainable target distance. The proposed development at Site GNLP5024 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.

3.13.11 **GP Surgery:** Site GNLP5024 is located approximately 5.9km from the closest GP surgery, 'Dr Martin & Partners' in Attleborough, outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.

3.13.12 **Leisure Facilities:** The closest leisure centre to Site GNLP5024 is 'Long Stratton Leisure Centre', located approximately 9.7km from the site. Site GNLP5024 is located outside of the target distance to this leisure facility, and therefore a minor negative impact on the health and wellbeing of site end users would be expected.

3.13.13 **Main Road:** Site GNLP5024 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.

3.13.14 **Green Network:** Site GNLP5024 is located within 600m from the PRoW network. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

3.13.15 As Site GNLP5024 is located outside the target distance to an NHS hospital, GP surgery and leisure centre, the proposed development at this site would be expected to have a major negative impact on the health and wellbeing of site end users.

SA9: Crime

3.13.16 See **Table 2.4,** 'SA9: Crime'.

SA10: Education

3.13.17 **Primary/Secondary School:** Site GNLP5024 is located approximately 2km from the closest primary school, Carleton Rode C of E VA Primary School. The site is also located approximately 3km from the closest secondary school, Old Buckenham High School. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

SA11: Economy

3.13.18 **Primary Employment Location:** Site GNLP5024 is located in a rural area, with the closest primary employment locations being the market town of Wymondham to the north, and Diss to the south, over 5km from the site and outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to employment.

SA12: Transport and Access to Services

3.13.19 **Bus Stop:** Site GNLP5024 is located outside the target distance to a bus stop. The closest bus stops are located approximately 1.2km from the site along the B1113 in New Buckenham, which provide regular service '37A' from East Harling to Norwich City Centre. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.

3.13.20 **Railway Station:** Site GNLP5024 is located outside the target distance to a railway station, with the nearest being Attleborough Railway Station situated over 5km to the north west. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.

3.13.21 **Pedestrian Access:** Site GNLP5024 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.

3.13.22 **Road Network:** Site GNLP5024 is well connected to the existing road network. The proposed development would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

SA13: Historic Environment

3.13.23 **Grade II Listed Building:** Site GNLP5024 is located approximately 280m from the Grade II Listed Buildings 'South Farmhouse' and 'Plumtree Farmhouse'. Due to the intervening development between the site and these Listed Buildings, as well as the previously developed nature of the site with a small number of additional pitches proposed, it is not anticipated that it would affect the setting of this Listed Building. Therefore, the proposed development at this site would be expected to result in a negligible impact on the historic environment.

3.13.24 **Conservation Area:** Site GNLP5024 is located approximately 175m from 'New Buckenham' CA. Due to the previously developed nature of the site with a small number of additional pitches proposed, it is not anticipated that it would affect the setting of this CA. Therefore, the proposed development at this site would be expected to result in a negligible impact on the historic environment.

SA14: Natural Resources, Waste and Contaminated Land

3.13.25 **Previously Developed Land:** Site GNLP5024 is located upon 0.62ha of primarily previously developed land; however, the site also contains undeveloped areas. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

3.13.26 **ALC:** Site GNLP5024 is situated upon ALC Grade 3 land which could potentially represent some of Greater Norwich's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this important natural resource.

SA15: Water

3.13.27 **SPZ:** Site GNLP5024 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.

4 Assessment of site policies

4.1 Preface

4.1.1 The following sections of this chapter provide an appraisal of the 12 site policies which have been prepared by the GNDP alongside each of the proposed Gypsy and Traveller sites. Each of the policies appraised in this report have been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework is presented in its entirety in **Appendix A**.

4.1.2 Each appraisal includes a SA impact matrix that provides an indication of the nature and magnitude of effects. Assessment narratives follow the impact matrices for each site policy, within which the findings of the appraisal and the rationale for the recorded impacts are described.

4.1.3 The assessments of the site policies presented within **sections 4.2** to **4.13** have drawn on the relevant site assessment findings as presented in **Chapter 3**.

4.2 Site Policy GNLP5004

Policy GNLP5004 – Land off Buxton Road, Cawston

Land off Buxton Road, Cawston (0.12 Ha) is allocated for a permanent residential Gypsy and Travellers Site. The site will accommodate approximately 4 residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

1. Access will be via Buxton Road. Any trees or hedgerow lost to form the access or visibility splay should be compensated for with new planting within the development.
2. Additional landscaping and hedges will be provided to enhance screening and to maintain the residential amenity of adjoining properties.
3. An archaeological assessment will be required prior to development.
4. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
5. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5004	0	+	-	0	+	-	0	--	0	--	+	-	0	-	0

4.2.1 Policy GNLP5004 sets out site-specific requirements for the development of Site GNLP5004. The policy seeks to ensure residential amenity of adjoining properties (i.e. those on Buxton Road) is maintained through the use of hedgerows and landscaping, and that new hedgerows replace those that may be lost through the development of access to the site. Additionally, development of the site must ensure prior appropriate archaeological investigations and pollution mitigation measures are undertaken.

4.2.2 Through seeking to screen the site from nearby properties using hedgerows and landscaping, the policy would help to provide privacy for existing local residents and conserve the surrounding landscape to some extent. Additionally, archaeological investigations prior to the development of the site would help to identify any below ground assets with potential cultural heritage value that have not yet been discovered.

4.2.3 Additionally, the proposed "*pollution mitigation measures*" owing to the site's location within a groundwater SPZ could help to ensure appropriate drainage of water from the site, which could help to protect water quality. A negligible impact on water could be achieved (SA Objective 15).

4.2.4 As such, Site Policy GNLP5004 could potentially improve the performance of this site for SA Objective 15, compared to the identified impacts in the site assessment (see **Chapter 3**). Although Policy GNLP5004 would lead to further potential benefits, such as regarding biodiversity, landscape and historic environment (SA Objectives 3, 4 and 13), the site policy is unlikely to change the assessment scores for these objectives (outlined within **Chapter 3**).

4.2.5 It is recommended that Policy GNLP5004 provides further details regarding landscaping measures, for example ensuring new planting with species appropriate to the local area which could be used to enhance the site, as well as to ascertain whether archaeological investigations will include desk or field studies.

4.3 Site Policy GNLP5005

Policy GNLP5005 – Wymondham Recycling Centre, Strayground Lane, Wymondham

Land off Strayground Lane Wymondham (0.07 ha), currently the Wymondham Recycling Centre, is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 2 residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

1. Access will be via Strayground Lane using the existing vehicular access for the recycling centre.
2. Improvements should be made to the passing bays along Strayground Lane and an adequate visibility is required at the junction of Whartons Lane with London Road (the B1172).
3. A contaminated land assessment is required and any mitigation must be completed prior to development.
4. An ecological assessment must be carried out and any identified impacts on nearby sites mitigated.
5. Pollution mitigation measures are required as the site is within the catchment of groundwater source protection zone (III).
6. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5005	-	+	--	0	+	-	0	-	0	--	-	-	0	-	-

4.3.1 Policy GNLP5005 sets out site-specific requirements for the development of Site GNLP5005 which regard the provision of access to the site, as well as the various assessments to be undertaken prior to the development of the site.

4.3.2 The site policy seeks to prepare the development of the site through requiring a contaminated land assessment, which would help to ensure that site end users would not be exposed to harmful contaminants which may potentially be present at the site. Additionally, the proposed "*pollution mitigation measures*" could help to ensure appropriate drainage of water from the site, which could help to protect water quality. An ecological assessment of the site could help to further identify potential impacts and required mitigation related to the 'Bays River Meadows North' CWS and lowland fens priority habitat which both coincide with the site.

4.3.3 It is deemed that although Site Policy GNLP5005 would lead to potential benefits, such as regarding biodiversity, health and water (SA Objectives 3, 8 and 15), the site policy is unlikely to change the assessment scores for the site overall (outlined within **Chapter 3**).

4.3.4 It is recommended that Site Policy GNLP5005 provides specific wording in relation to the protection of the CWS and retention of priority habitat within the site, as well as protection of the Bays River from construction/end use related pollution.

4.4 Site Policy GNLP5009

Policy GNLP5009 – Hockering Lane, Bawburgh

Land off Hockering Lane Bawburgh (0.59 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 6 residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

1. Access will be from Hockering Lane via a private road, therefore third-party rights of access will be required.
2. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
3. An archaeological assessment will be required prior to development.
4. Development will be designed to avoid impacts to and from the underground gas pipeline.
5. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (II).
6. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5009	0	+	-	-	+	-	0	-	0	-	+	-	-	-	-

4.4.1 Policy GNLP5009 sets out site-specific requirements for the development of Site GNLP5009 which includes provision of access to the site, design considerations and assessments to be undertaken prior to the development of the site.

4.4.2 The policy states that an ecological assessment will be carried out prior to the development of the site, to help inform any required mitigation measures in relation to protected species and nearby sites. This would be likely to help identify and conserve local biodiversity features.

4.4.3 The policy also requires an archaeological assessment prior to the development of the site, which would help to identify any below ground assets with potential cultural heritage value that have not yet been discovered.

4.4.4 Furthermore, as a Cadent gas pipeline crosses the site from east to west, Policy GNLP5009 requires this to be investigated further to ensure that the site can be developed safely and without adverse effects on the function of this pipeline.

4.4.5 Additionally, the proposed "*pollution mitigation measures*" owing to the site's location within a groundwater SPZ could help to ensure appropriate drainage of water from the site, which could help to protect water quality.

4.4.6 Overall, although Site Policy GNLP5009 would lead to potential benefits, such as regarding biodiversity, the historic environment and water (SA Objectives 3, 13 and 15), the site policy is unlikely to change the assessment scores for the site overall (outlined within **Chapter 3**).

4.4.7 It is recommended that Policy GNLP5009 incorporates wording to protect or where possible enhance the trees and hedgerow surrounding the site, which would be likely to help conserve the landscape character and historic settings of nearby heritage assets in Bawburgh by ensuring the site is appropriately screened.

4.5 Site Policy GNLP5014

Policy GNLP5014 – A47 North Burlingham Junction

Land off A47 North Burlingham Junction is allocated as a 2.48 ha broad location for a residential Gypsy and Traveller site within which a 1 ha site will accommodate approximately 15 residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

1. Access will be from the stopped-off road linking to the newly aligned B1140.
2. Noise and air quality investigations will be required, with provision of a layout and design that incorporates a landscape buffer to the nearby major roads and noise mitigation measures to protect residential amenity.
3. Landscaping and tree planting will be required to preserve the landscape character of the surrounding area and to protect views of non-designated heritage assets nearby.
4. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5014	0	+	+/-	0	+	-	0	--	0	--	+	-	0	-	0

4.5.1 Policy GNLP5014 sets out site-specific requirements for the development of Site GNLP5014 which includes provision of access to the site, design considerations regarding the adjacent main road, and landscaping to be undertaken for the development.

4.5.2 The policy requires noise and air quality investigations to be undertaken, and for the development to ensure "*provision of a layout and design that incorporates a landscape buffer to the nearby major roads and noise mitigation measures*". Through careful design and layout, it is possible that this could mitigate adverse impacts on site end users associated with traffic along the adjacent A47 and proposed road improvements, leading to a negligible impact on air quality and noise (SA Objective 1). The proposed landscape buffer in combination with the required "*Landscaping and tree planting*" would also be likely to reduce adverse effects on the landscape character and help to protect residential amenity, with a negligible impact likely for SA Objective 4.

4.5.3 Furthermore, the policy sets out that the proposed landscape measures should seek to protect views of nearby non-designated heritage assets, with potential benefits in terms of cultural heritage.

4.5.4 Overall, Site Policy GNLP5014 could potentially improve the performance of this site for air quality and noise (SA Objective 1) and landscape (SA Objective 4), compared to the identified impacts in the site assessment (see **Chapter 3**). Although the policy would also lead to potential benefits in terms of health (SA Objective 8), and potentially climate change adaptation owing to the GI provisions (SA Objective 2), the site policy is unlikely to change the assessment scores for the site overall for these objectives, as outlined within **Chapter 3**.

4.5.5 The site is relatively isolated in location and performs poorly in terms of access to healthcare, schools and other services. It is recommended that Policy GNLP5014 seeks to improve connections to and from the site, including sustainable transport options, to improve accessibility.

4.6 Site Policy GNLP5019

Policy GNLP5019 – Woodland Stable, Shortthorn Road, Stratton Strawless

Woodland Stable, Shortthorn Road, Stratton Strawless (0.33 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 8 additional residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

1. Access should be via the existing access off Shortthorn Road that serves the Woodland Stables site.
2. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
3. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5019	0	-	-	0	+	-	0	--	0	--	+	--	0	-	0

4.6.1 Policy GNLP5019 sets out site-specific requirements for the development of Site GNLP5019 which includes provision of suitable access to the site via the neighbouring land uses, and assessments to be undertaken prior to the development.

4.6.2 The policy would be expected to ensure that appropriate road access to the site is provided, as the site is not currently connected to the existing road network.

4.6.3 The policy states that an ecological assessment will be carried out prior to the development of the site, to help inform any required mitigation measures in relation to protected species and nearby sites. This would be likely to help identify and conserve local biodiversity features.

4.6.4 It is deemed that although Site Policy GNLP5019 would lead to potential benefits, such as regarding biodiversity and accessibility (SA Objectives 3 and 12), the site policy is unlikely to change the assessment scores for the site overall (outlined within **Chapter 3**).

4.6.5 The site is relatively isolated in location and performs poorly in terms of access to healthcare, schools and other services. It is recommended that Policy GNLP5019 seeks to improve connections to and from the site, including sustainable transport options, to improve accessibility. Furthermore, the policy could be enhanced through seeking to retain as many of the existing trees on site as possible alongside the proposed development, or re-plant where removal is deemed necessary following ecological or arboricultural surveys.

4.7 Site Policy GNLP5020

Policy GNLP5020 – Romany Meadow, The Turnpike, Carleton Rode

Land off the B1113 (0.54 ha) at Romany Meadow, The Turnpike, Carleton Rode is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 6 additional residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

1. Access should be via the existing access off The Turnpike that serves the Romany Meadow site.
2. A surface water flood risk assessment must be carried out with caravans and other structures positioned away from areas at surface water flood risk.
3. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
4. Landscaping and tree planting will be required to preserve the landscape character of the surrounding area and to protect views of nearby listed buildings.
5. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
6. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5020	0	0	-	0	+	-	0	--	0	--	-	-	0	-	0

4.7.1 Policy GNLP5020 sets out site-specific requirements for the development of Site GNLP5020 which includes provision of access to the site, landscaping measures, and assessments to be undertaken prior to the development.

4.7.2 The policy states that an ecological assessment will be carried out prior to the development of the site, to help inform any required mitigation measures in relation to protected species and nearby sites. This would be likely to help identify and conserve local biodiversity features.

4.7.3 The policy sets out the requirement for landscaping and tree planting alongside the proposed development, in order to help "*preserve the landscape character of the surrounding area and to protect views of nearby listed buildings*". These measures would be likely to reduce the potential for adverse effects on the landscape character and help to protect residential amenity. Through seeking to preserve views of nearby heritage assets, the policy would also lead to potential benefits in terms of cultural heritage.

4.7.4 The policy also requires a surface water flood risk assessment which may help to ensure that site end users are protected from adverse effects associated with surface water flooding, and that the development does not exacerbate surface water flood risk elsewhere. A negligible impact on climate change adaptation could therefore be expected (SA Objective 2).

4.7.5 Additionally, the proposed "*pollution mitigation measures*" owing to the site's location within a groundwater SPZ could help to ensure appropriate drainage of water from the site, which could help to protect water quality. A negligible impact on water could be achieved (SA Objective 15).

4.7.6 As such, Site Policy GNLP5020 could potentially improve the performance of this site for SA Objectives 2 and 15, compared to the identified impacts in the site assessment (see **Chapter 3**). It is deemed that although Site Policy GNLP5020 would lead to further potential benefits, such as regarding biodiversity, landscape and the historic environment (SA Objectives 3, 4 and 13), the site policy is unlikely to change the assessment scores for these objectives (outlined within **Chapter 3**).

4.7.7 The site is relatively isolated in location and performs poorly in terms of access to healthcare, schools and employment opportunities. It is recommended that Policy GNLP5020 seeks to improve connections to and from the site, including sustainable transport options, to improve accessibility.

4.8 Site Policy GNLP5021

Policy GNLP5021 – Land off Holt Road, Horsford

The Old Produce Shop, Holt Road, Horsford (0.9 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 6 additional residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

1. Access should be via the existing access off Holt Road that serves the Old Produce Shop site.
2. Noise and air quality investigations are required, with provision of a layout and design that incorporates a landscape buffer to the nearby major roads and noise mitigation measures to protect residential amenity.
3. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
4. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5021	0	+	-	0	+	-	0	--	0	--	+	-	0	-	0

4.8.1 Policy GNLP5021 sets out site-specific requirements for the development of Site GNLP5021 which includes provision of access to the site as well as design and landscaping measures.

4.8.2 The policy requires noise and air quality investigations to be undertaken, and for the development to ensure "*provision of a layout and design that incorporates a landscape buffer to the nearby major roads and noise mitigation measures*". Through careful design and layout, it is possible that this could mitigate adverse impacts on site end users associated with traffic along the adjacent A1270/A140 roundabout, leading to a negligible impact on air quality and noise (SA Objective 1). Depending on the design of the landscape buffer, these measures could also help to reduce the potential for adverse impacts on the surrounding landscape.

4.8.3 Additionally, the proposed "*pollution mitigation measures*" owing to the site's location within a groundwater SPZ could help to ensure appropriate drainage of water from the site, which could help to protect water quality. A negligible impact on water could be achieved (SA Objective 15).

4.8.4 As such, Site Policy GNLP5021 could potentially improve the performance of this site for air quality and noise (SA Objective 1) and water (SA Objective 15), compared to the identified impacts in the site assessment (see **Chapter 3**). Although the policy would also lead to potential benefits in terms of landscape (SA Objective 4), the site policy is unlikely to change the assessment scores for the site overall for this objective.

4.8.5 The site is relatively isolated in location and performs poorly in terms of access to healthcare, schools and other services. It is recommended that Policy GNLP5021 seeks to improve connections to and from the site, including sustainable transport options, to improve accessibility.

4.9 Site Policy GNLP5022

Policy GNLP5022 – Land off Reepham Road, The Oaks, Foulsham

The Oaks off Reepham Road, is allocated for a residential Gypsy and Traveller site (3.3 ha). The site will accommodate approximately 5 additional residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

1. Access will be via the existing access on Reepham Road. A highway safety assessment is required and an appropriate visibility splay must be achieved.
2. A surface water flood risk assessment must be carried out with caravans and other structures positioned away from areas at surface water flood risk.
3. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
4. Landscaping and tree planting will be required to preserve the landscape character of the surrounding area and to protect views of nearby listed buildings.
5. Development will be designed to avoid impacts to and from the underground gas pipeline.
6. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
7. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5022	0	0	-	0	+	-	0	--	0	--	+	-	0	-	0

4.9.1 Policy GNLP5022 sets out site-specific requirements for the development of Site GNLP5022 which includes provision of access to the site, design and landscaping measures, and assessments to be undertaken prior to the development.

4.9.2 The policy states that an ecological assessment will be carried out prior to the development of the site, to help inform any required mitigation measures in relation to protected species and nearby sites. This would be likely to help identify and conserve local biodiversity features.

4.9.3 The policy sets out the requirement for landscaping and tree planting alongside the proposed development, with the aim of helping to "*preserve the landscape character of the surrounding area and to protect views of nearby listed buildings*". These measures would be likely to reduce the potential for adverse effects on the landscape character and help to protect residential amenity. Through seeking to preserve views of nearby heritage assets, which may include the Grade II Listed Building 'The Old Hall' and Grade II* Listed Building 'Church of St Andrew' in Themelthorpe, the policy would also lead to potential benefits in terms of cultural heritage.

4.9.4 Furthermore, as the Bacton to Kings Lynn gas pipeline crosses the site from east to west, Policy GNLP5022 requires this to be investigated further to ensure that the site can be developed safely and without adverse effects on the function of this pipeline.

4.9.5 The policy also requires a surface water flood risk assessment which may help to ensure that site end users are protected from adverse effects associated with surface water flooding, and that the development does not exacerbate surface water flood risk elsewhere. A negligible impact on climate change adaptation could therefore be expected (SA Objective 2).

4.9.6 Additionally, the proposed "*pollution mitigation measures*" owing to the site's location within a groundwater SPZ could help to ensure appropriate drainage of water from the site, which could help to protect water quality. A negligible impact on water could be achieved (SA Objective 15).

4.9.7 As such, Site Policy GNLP5022 could potentially improve the performance of this site for climate change adaptation (SA Objective 2) and water (SA Objective 15), compared to the identified impacts in the site assessment (see **Chapter 3**). It is deemed that although Site Policy GNLP5022 would lead to further potential benefits, such as regarding biodiversity, landscape and the historic environment (SA Objectives 3, 4 and 13), the site policy is unlikely to change the assessment scores for these objectives (outlined within **Chapter 3**).

4.9.8 The site is relatively isolated in location and performs poorly in terms of access to healthcare, schools and public transport infrastructure. It is recommended that Policy GNLP5022 seeks to improve connections to and from the site, including sustainable transport options, to improve accessibility.

4.10 Site Policy GNLP5023

Policy GNLP5023 – Land off Strayground Lane, Wymondham

Land at Strayground Lane, Wymondham (1.1 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 10 residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

1. Access will be via Strayground Lane, using either the existing field access at the north-east corner of the site or a new access on the eastern boundary. If a new access is provided any loss of trees or hedgerows will be compensated for by new planting within the site.
2. Highway improvements will be required to the passing bays along Strayground Lane and an adequate visibility is required at the junction of Whartons Lane with London Road (the B1172).
3. As the land adjacent to the south west is in Flood Zones 2 and 3 a flood risk assessment maybe required, caravans and other structures shall be positioned away from this area.
4. A contaminated land assessment is required and any mitigation must be completed prior to development.
5. Screening will be required to the neighbouring paving company.
6. An ecological assessment must be carried out and any identified impacts on nearby sites mitigated.
7. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
8. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5023	-	+	-	-	+	-	0	-	0	--	+	-	0	-	-

4.10.1 Policy GNLP5023 sets out site-specific requirements for the development of Site GNLP5023 which includes provision of access to the site and various assessments to be undertaken prior to the development.

4.10.2 The site policy seeks to prepare the development of the site through requiring a contaminated land assessment, which would help to ensure that site end users would not be exposed to harmful contaminants which may potentially be present at the site. Additionally, the proposed "*pollution mitigation measures*" could help to ensure appropriate drainage of water from the site, which could help to protect water quality. An ecological assessment of the site could help to further identify potential impacts and required mitigation related to the 'Bays River Meadows North' CWS which is directly adjacent to the site.

4.10.3 Site GNLP5023 wholly coincides with lowland fens priority habitat. In line with the NPPF, local plans should "*promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity*". As such, the loss or degradation of priority habitats should be avoided where possible. The proposed ecological assessment would be expected to help understand the quality and extent of the priority habitat and inform required mitigation or compensation measures. The policy also requires compensatory planting for any loss of trees required as a result of construction of access to the site, which would help to reduce adverse effects in this regard. Although, it is likely that the proposed development would result in some loss of the priority habitat.

4.10.4 The proposed compensatory planting, and policy provision that "*Screening will be required to the neighbouring paving company*" could help to reduce adverse effects on the surrounding landscape character, to some extent.

4.10.5 The policy also seeks to ensure that any flooding issues on site associated with the adjacent areas of Flood Zone 2 and 3 along the Bays River are addressed, where necessary. These provisions would be expected to benefit climate change adaptation (SA Objective 2).

4.10.6 On the whole, although Site Policy GNLP5023 would lead to potential benefits, such as regarding climate change adaptation, biodiversity, landscape, health and water (SA Objectives 2, 3, 4, 8 and 15), the site policy is unlikely to change the assessment scores for the site overall (outlined within **Chapter 3**).

4.10.7 It is recommended that Site Policy GNLP5023 provides specific wording in relation to the protection of the adjacent CWS and priority habitat within the site, as well as protection of the Bays River from construction/end use related pollution. The policy could also be enhanced through including more detailed requirements to consider landscaping measures to reduce potential for adverse effects on the surrounding landscape character.

4.11 Site Policy GNLP5024

Policy GNLP5024 – Upgate Street, Carleton Rode

Upgate Street, Carleton Rode (0.62 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 4 additional residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

1. Access should be via the existing access off Upgate Street.
2. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
3. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
4. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5024	0	-	-	0	+	-	0	--	0	--	-	-	0	-	0

4.11.1 Policy GNLP5024 sets out site-specific requirements for the development of Site GNLP5024 which includes provision of access to the site and assessments to be undertaken prior to the development.

4.11.2 The policy states that an ecological assessment will be carried out prior to the development of the site, to help inform any required mitigation measures in relation to protected species and nearby sites. This would be likely to help identify and conserve local biodiversity features. The proposed ecological assessment would be expected to help understand the quality and extent of the traditional orchard priority habitat located in the north of the site, and inform required mitigation or compensation measures.

4.11.3 Additionally, the proposed "*pollution mitigation measures*" owing to the site's location within a groundwater SPZ could help to ensure appropriate drainage of water from the site, which could help to protect water quality. A negligible impact on water could be achieved (SA Objective 15).

4.11.4 As such, Site Policy GNLP5024 could potentially improve the performance of this site for water (SA Objective 15), compared to the identified impacts in the site assessment (see **Chapter 3**). It is deemed that although Site Policy GNLP5024 would lead to further potential benefits, such as regarding biodiversity (SA Objective 3), the site policy is unlikely to change the assessment scores for this objective (outlined within **Chapter 3**).

4.11.5 Although the site is largely previously developed with low potential for adverse effects on environmentally focused objectives, it is relatively isolated in location and performs poorly in terms of access to healthcare, schools, employment and local services. It is recommended that Policy GNLP5024 seeks to improve connections to and from the site, including sustainable transport options, to improve accessibility.

4.12 Site Policy GNLP5013 (Reasonable Alternative)

Policy GNLP5013 – Ketteringham Depot, Land west of Station Lane, Ketteringham

Land west of Station Lane, Ketteringham, (0.86 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 10 residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

1. Access should be via the existing access that currently serves the depot.
2. Investigation is required of the potential for the conversion of existing buildings, particularly at the frontage, as part of the redevelopment.
3. Noise and air quality investigations are required, and the layout and design of the site should include boundary treatments that protect residential amenity.
4. A contaminated land assessment is required and any mitigation must be completed prior to development.
5. An ecological survey is required due to the potential presence of protected species such as bats or barn owls in the existing buildings.
6. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
7. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5013	0	+	-	+	+	-	0	-	0	--	-	-	0	+	0

4.12.1 Policy GNLP5013 sets out site-specific requirements for the development of Site GNLP5013 which includes provision of access to the site, design considerations regarding the existing buildings on site, and various assessments to be undertaken prior to the development. Although the site is not preferred by the Councils for allocation at this stage, it is considered to be a reasonable alternative and so the policy sets out the requirements for the site, should it come forward at a later date.

4.12.2 The policy seeks to ensure that potential for redevelopment of buildings within the previously developed site is explored, and that the layout and design of the site seeks to protect residential amenity through boundary treatments. These requirements may help to improve the quality and character of the site and surroundings compared to the current nature of the site, and provide a more attractive frontage, potentially leading to a minor positive impact on landscape (SA Objective 4).

4.12.3 Owing to the presence of existing buildings on site, the policy states that an ecological survey will be required, to help inform any required mitigation measures in relation to protected species.

4.12.4 The policy requires a contaminated land survey to be carried out, to inform any necessary mitigation measures to make the site safe. Furthermore, "*noise and air quality investigations*" are required in addition to the proposed boundary treatments, which may help to reduce adverse effects on health and wellbeing experienced by site end users as a result of neighbouring site uses.

4.12.5 Additionally, the proposed "*pollution mitigation measures*" owing to the site's location within a groundwater SPZ could help to ensure appropriate drainage of water from the site, which could help to protect water quality. A negligible impact on water could be achieved (SA Objective 15).

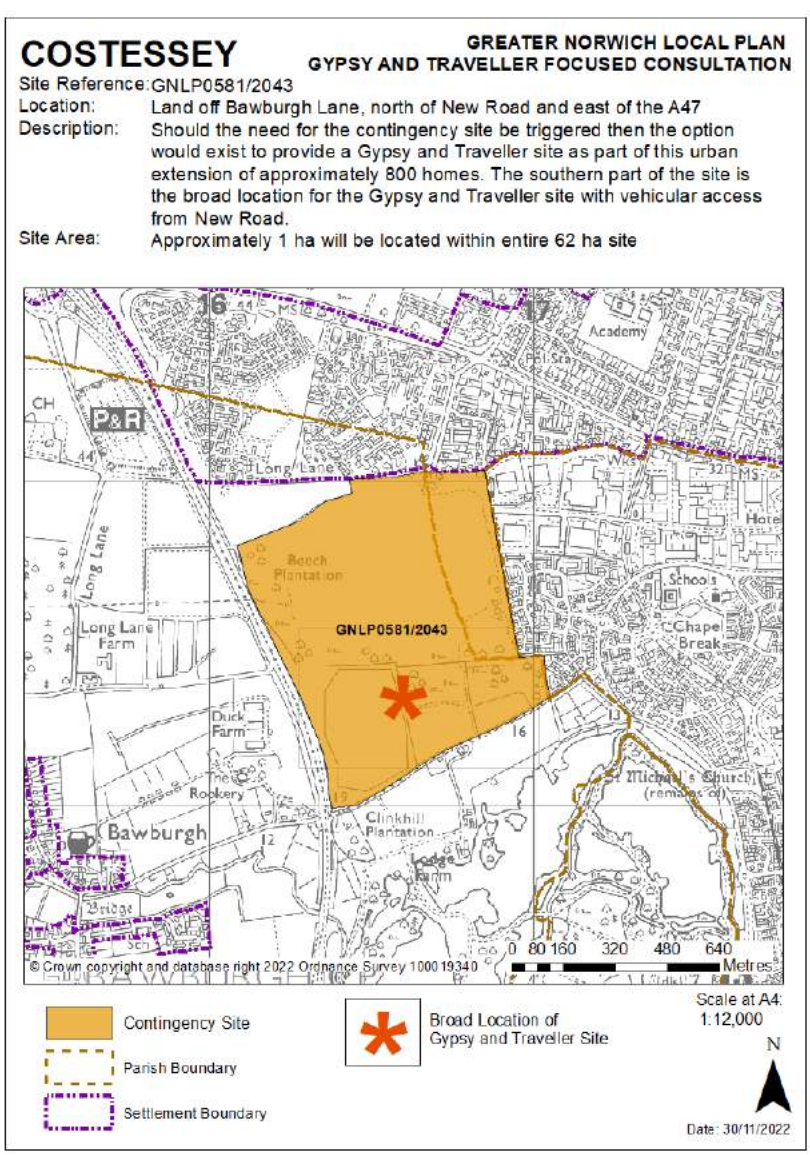
4.12.6 Overall, Site Policy GNLP5013 could potentially improve the performance of this site for landscape (SA Objective 4) and water (SA Objective 15), compared to the identified impacts in the site assessment (see **Chapter 3**). Although the policy would also lead to potential benefits in terms of air quality, noise, biodiversity, health and natural resources (SA Objectives 1, 3, 8 and 14), the site policy is unlikely to change the assessment scores for the site overall for these objectives, as outlined within **Chapter 3**.

4.12.7 Although the site is previously developed with low potential for adverse effects on environmentally focused objectives, it is relatively isolated in location and performs poorly in terms of access to healthcare, schools and other services. It is recommended that Policy GNLP5013 seeks to improve connections to and from the site, including sustainable transport options, to improve accessibility.

4.13 Proposed change to Policy GNLP0581/2043

Policy GNLP0581/2043 – Land off Bawburgh Lane, north of New Road and east of A47 – incorporation of a Gypsy and Traveller site into the Costessey contingency site allocation

Subject to up-to-date evidence of need in the remainder of the plan period evidence at the time, provision of a 1 ha Gypsy and Traveller site providing approximately 18 pitches.



	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
Change to GNLP0581/2043	+/-	+/-	-	-	+	+/-	0	-	0	+/-	+	-	-	-	-

4.13.1 A 62ha site at Costessey is included in the submitted GNLP as a contingency housing site which can come forward in the event that the overall delivery of homes in the GNLP area falls significantly below annual targets. Should the need for the contingency site be triggered then the proposed change to Policy GNLP0581/2043 would seek to provide a Gypsy and Traveller site as part of this urban extension.

4.13.2 The proposed change to Policy GNLP0581/2043 sets out details of Gypsy and Traveller Site GNLP0581/2043GT which regards the number of pitches and overall area to be allocated within the wider Costessey Contingency Site.

4.13.3 The policy at present contains no specific requirements for the development of the site, regarding issues such as flood risk, biodiversity and landscape, as the specific location of the site has not been confirmed. Therefore, the proposed change to Policy GNLP0581/2043 at present is unlikely to result in any significant difference compared to the identified impacts for Site GNLP0581/2043GT overall (outlined within **Chapter 3**).

4.13.4 It is recommended that, if the site comes forward and when the specific site location for Gypsy and Traveller use has been agreed, the policy is reviewed to ensure it reflects the potential impacts of developing the site and ways to mitigate these issues.

5 Mitigation and residual effects

5.1 Overview

5.1.1 The sustainability appraisal of the 12 reasonable alternative Gypsy and Traveller sites against baseline sustainability information has identified a number of adverse effects associated with the SA Objectives in the SA Framework (see **Appendix A**). The purpose of this chapter is to consider if and how these effects can be mitigated by applying the mitigation hierarchy.

5.1.2 The first stage of the mitigation hierarchy is to consider if the adverse effect can be avoided. This may be possible by withdrawing the potential site allocation.

5.1.3 For allocations which are likely to remain on the basis that the plan makers consider their inclusion to be necessary, mitigation measures should be explored to reduce the overall significance of effect. If it is not possible to mitigate identified adverse effects, these will remain as 'residual effects' at the end of the SA process.

5.1.4 One way to reduce adverse impacts identified against baseline receptors is to consider the potential mitigating effects of planning policies. **Tables 5.1 – 5.14** list the identified adverse impacts according to SA Objective, as discussed within **Chapter 3**, and list development management policies from lower tier plans (i.e. which have already been adopted) that might reasonably be expected to help mitigate identified adverse effects. The plans in question have been prepared by Broadland District Council[50] and South Norfolk Council[51].

5.1.5 Site policies have been prepared for all reasonable alternative Gypsy and Traveller sites assessed within this report. Attributes of the proposed Gypsy and Traveller Site Policies, alongside other emerging GNLP Strategic Policies, could also potentially help to mitigate some of the negative impacts that have been identified as a result of some of the development proposals. These are discussed in **Chapter 4**.

5.1.6 Each table has three columns. Column one lists the adverse effects, column two lists relevant policies and the final column indicates the extent to which these policies would be expected to mitigate each identified adverse effect.

5.1.7 It is important to demonstrate the amount of mitigation that may be required to ensure a site can optimise sustainability performance. The level of intervention that may be required to facilitate effective mitigation varies and can help determine the eventual choice of preferred option in the plan. Sites which require low levels of intervention are likely to be preferable to sites that require complex and potentially unviable strategies.

[50] Broadland District Council (2015) Development Management DPD. Available at: https://www.broadland.gov.uk/downloads/file/1118/development_management_dpd_adopted [Date accessed: 22/04/22]

[51] South Norfolk Council (2015) South Norfolk Local Plan, Development Management Policies Document. Available at: https://www.south-norfolk.gov.uk/residents/planning/planning-policy/adopted-south-norfolk-local-plan/development-management-policies [Date accessed: 22/04/22]

5.2 SA Objective 1 – Air Quality and Noise

5.2.1 **Table 5.1** presents the identified adverse impacts on air quality and noise and the likely impacts post-mitigation.

Table 5.1: *Identified adverse impacts and potential mitigation for SA Objective 1 - Air Quality and Noise*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
Exposure to air and noise pollution from main roads	GNLP Policy 2 seeks to protect air quality and minimise pollution, which includes the provision of electric vehicle infrastructure. Policies EN4 (Broadland) and DM3.14 (South Norfolk) seek to ensure that development proposals do not result in an unacceptable impact on air quality or noise pollution. Policy DM3.3 (South Norfolk) seeks to ensure that proposals for new Gypsy and Traveller sites are not approved where there are unsafe localised pollution levels.	These policies would not be expected to fully mitigate the impacts of transport associated emissions from new development on health for development proposals located in close proximity to main roads.
Exposure to noise pollution and vibrations from railway lines	Not addressed within GNLP strategic policies or district DM policies.	These policies would not be anticipated to mitigate potential adverse impacts on noise pollution and vibrations at development proposals located in close proximity to railway lines.

5.3 SA Objective 2 – Climate Change Mitigation and Adaptation

5.3.1 **Table 5.2** presents the identified adverse impacts on climate change mitigation and adaptation, and the likely impacts post-mitigation.

Table 5.2: *Identified adverse impacts and potential mitigation for SA Objective 2 – Climate Change Mitigation and Adaptation*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
Risk of surface water flooding	GNLP Policy 2 would be anticipated to mitigate the risk of surface water flooding that may arise as a result of development, through the requirement for development to incorporate sustainable drainage measures and contribute to the green infrastructure cover. Policies CSU5, EN1, EN3 (Broadland), DM1.4, DM4.2 and DM4.4 (South Norfolk) would be expected to ensure development proposals alleviate the risk of surface water flooding. Policy DM3.3 (South Norfolk) would ensure that Gypsy and Traveller sites include the provision of satisfactory foul and surface drainage.	Overall, these policies would be expected to mitigate the risk of surface water flooding and would seek to prevent the exacerbation of surface water flood risk in surrounding areas.

5.4 SA Objective 3 – Biodiversity, Geodiversity and Green Infrastructure

5.4.1 **Table 5.3** presents the identified adverse impacts on biodiversity, geodiversity and green infrastructure and the likely impacts post-mitigation.

Table 5.3: *Identified adverse impacts and potential mitigation for SA Objective 3 – Biodiversity, Geodiversity and Green Infrastructure*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
Threats or pressures to Habitats sites (SAC, SPA, Ramsar sites)	GNLP Policy 3 seeks to address impacts of visitor pressure caused by residents of new development on Habitats sites. The policy would be expected to ensure that developments provide, or provide funding for, significantly higher amounts of appropriate amenity green infrastructure to protect Habitats sites identified within the HRA. Policies EN1, EN3 (Broadland), DM1.4, DM3.8, DM4.2 and DM4.4 (South Norfolk) could potentially help to safeguard and enhance biodiversity including at internationally designated sites. Policy DM3.3 (South Norfolk) would ensure that Gypsy and Traveller developments are not permitted where sites designated at international or national levels will be unacceptably harmed.	These policies alone would not be expected to mitigate potential adverse impacts on Habitats sites. The emerging HRA found that, subject to satisfactory policy modification with respect to nutrient neutrality, the Gypsy and Traveller sites will have no adverse effect upon the integrity of Habitats sites alone or in combination. As this policy wording has not yet been finalised, the impacts on these Habitats sites remain uncertain for the purpose of this SA report at the time of writing.
Threats or pressures to SSSIs	GNLP Policy 2 would seek to ensure that development proposals contribute towards green infrastructure network, and GNLP Policy 3 aims to ensure development does not result in harm to designated assets of the natural environment. Policies EN1, EN3 (Broadland), DM1.4, DM3.8, DM4.2 and DM4.4 (South Norfolk) could potentially help to safeguard and enhance biodiversity including at SSSIs. Policy DM3.3 (South Norfolk) would ensure that Gypsy and Traveller developments are not permitted where sites designated at national levels will be unacceptably harmed.	At the time of writing, it is uncertain whether the policies would be expected to mitigate potential adverse impacts on SSSIs associated with Nutrient Impact Zones.
Threats or pressures to other designated and non-designated biodiversity sites and habitats (CWS and Priority Habitats)	GNLP Policy 2 would contribute towards the protection and enhancement of the green infrastructure network. GNLP Policy 3 aims to conserve and enhance the natural environment, including priority habitats, networks and species, ancient trees and woodlands, geodiversity, avoid harm to designated or non-designated assets and ensure development proposals result in biodiversity net gain. Policies EN1, EN3 (Broadland), DM1.4, DM3.8, DM4.2 and DM4.4 (South Norfolk) could potentially help to safeguard and enhance biodiversity including at designated and non-designated biodiversity sites.	These policies would be expected to mitigate adverse impacts of development proposals on designated and non-designated biodiversity assets. There is some uncertainty regarding the mitigation potential at Site GNLP5023 which wholly coincides with lowland fens priority habitat. Site surveys are

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
	Policy DM3.3 (South Norfolk) would ensure that Gypsy and Traveller developments are not permitted where sites designated at national or county levels will be unacceptably harmed.	recommended to assess the quality and extent of this habitat and inform any required site-specific mitigation, further to the policies listed in this table.

5.5 SA Objective 4 – Landscape

5.5.1 **Table 5.4** presents the identified adverse impacts on landscape and the likely impacts post-mitigation.

Table 5.4: *Identified adverse impacts and potential mitigation for SA Objective 4 - Landscape*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
Threaten or result in the loss of rural and locally distinctive landscape character	GNLP Policies 2 and 3 would be expected to contribute towards mitigating negative impacts associated with development on Greater Norwich's locally distinctive landscape character and seek to conserve and enhance the special qualities of the built, historic and natural environment. Policies EN2, GC4 (Broadland), DM1.4, DM2.1, DM2.3, DM2.6, DM2.7, DM2.8, DM2.9, DM3.3, DM3.4, DM3.5, DM3.8, DM3.9, DM4.5, DM4.6 and DM4.9 (South Norfolk) seek to protect and enhance the local landscape character and distinctiveness of the surrounding environment. Policy DM3.3 (South Norfolk) sets out various criteria to help ensure that proposed Gypsy and Traveller sites integrate with existing settlements and do not have significant adverse impacts on the local landscape.	These policies would be anticipated to mitigate adverse impacts on the landscape character at all potential development sites.
Change in views experienced by existing local residents	GNLP Policies 2 and 3 would be expected to mitigate impacts on views experienced by local residents, to some extent, through ensuring that development takes account of the setting and character of the local area. Policies EN2, GC4 (Broadland), DM2.8, DM3.8 and DM4.6 (South Norfolk) would be expected to protect visual amenity and ensure development proposals incorporate designs which enhance appearance and retain important views. Policy DM3.3 (South Norfolk) would be expected to ensure that Gypsy and Traveller development is sited and designed to integrate into the local landscape including screening by vegetation or landform, and that development has regard to the amenity of nearby properties.	These policies would be expected to mitigate the impact of development on views experienced by local residents.
Increase risk of urbanisation	GNLP Policy 3 seeks to conserve and enhance the natural environment, by ensuring that new development is located and designed to enhance local character and sense of place, taking account of local design guidance. GNLP Policy 2 would be	These policies may help to reduce some of the negative impacts associated with transition of new

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
of the countryside	expected to help reduce the likelihood of urbanisation of the countryside and coalescence by maintaining strategic gaps. Policies EN2 (Broadland) and DM4.7 (South Norfolk) seek to protect strategic gaps between settlements. Policies GC4 (Broadland), DM1.3, DM3.13, DM4.4 and DM4.6 (South Norfolk) would be expected to ensure that new development is of an appropriate scale and form to retain the character of the surrounding area. Policy DM3.3 (South Norfolk) seeks to ensure that the scale of Gypsy and Traveller sites does not dominate the nearest settled community.	development into the countryside. However, due to the rural and undeveloped context in which affected proposed Gypsy and Traveller sites are situated, the policies would not be expected to fully mitigate these impacts.

5.6 SA Objective 5 – Housing

5.6.1 No adverse impacts on housing anticipated.

5.7 SA Objective 6 – Population and Communities

5.7.1 **Table 5.5** presents the identified adverse impacts on population and communities and the likely impacts post-mitigation.

Table 5.5: *Identified adverse impacts and potential mitigation for SA Objective 6 – Population and Communities*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
Limited access to local services and facilities	GNLP Policy 2 seeks to provide safe and sustainable access to on-site and local services including schools, healthcare, shops, leisure/community facilities and libraries. This policy also would be expected to help promote inclusive and safe communities, through providing access to these services and opportunities for social interaction. GNLP Policy 4 would be expected to provide transport improvements including improved bus, cycling and walking networks through the Transport for Norwich Strategy. Policies CSU2, CSU3, R1 (Broadland), DM1.2, DM2.4, DM2.5 and DM3.16 (South Norfolk) seek to protect existing community facilities from loss and encourage the development of new shops and facilities in local centres. Policies DM3.3 (South Norfolk) and H6 (Broadland) would be expected to ensure future residents of the proposed Gypsy and Traveller sites are not overly isolated from settlements and can access facilities to meet their daily needs.	These policies would be expected to mitigate the adverse impact on restricted access to local services and facilities and would help to promote community cohesion.

5.8 SA Objective 7 – Deprivation

5.8.1 The SA process has not identified any significant adverse impacts on deprivation as a result of the development of reasonable alternative sites. However, measures outlined in policies could potentially enhance the sustainability performance under this objective (see **Table 5.6**).

Table 5.6: *Identified adverse impacts and potential mitigation for SA Objective 7 – Deprivation*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
No significant adverse impacts on deprivation anticipated	GNLP Policy 2 promotes the development of inclusive, resilient and safe communities. Policy GC4 (Broadland) seeks to create sustainable, inclusive and mixed communities, and Policy DM3.8 (South Norfolk) promotes inclusive design. Policies DM3.3 (South Norfolk) and H6 (Broadland) seek to ensure that Gypsy and Traveller sites are not overly isolated from existing settlements and Policy DM3.3 promotes integration with the surrounding community.	These policies would be anticipated to have a minor positive impact on deprivation across Greater Norwich.

5.9 SA Objective 8 – Health

5.9.1 **Table 5.7** presents the identified adverse impacts on health and the likely impacts post-mitigation.

Table 5.7: *Identified adverse impacts and potential mitigation for SA Objective 8 – Health*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
Limited access to NHS hospital	GNLP Policy 2 would be expected to ensure that development provides safe and sustainable access to existing healthcare facilities. GNLP Policy 4 seeks to deliver improvements to healthcare infrastructure and improved public transport, which could potentially improve site end users' access to NHS hospitals. Policies TS1, TS2, CG4, H5 (Broadland), DM3.8 and DM3.10 (South Norfolk) would be expected to improve connections to public transport and incorporate travel plans where required. These policies could potentially provide improved bus links to NHS hospitals.	These policies would not be expected to fully mitigate the existing restricted access to these services, especially in terms of providing sustainable connections for rural areas of Greater Norwich to NHS hospitals.
Limited access to GP surgery	GNLP Policy 2 would be expected to ensure that development provides safe and sustainable access to existing healthcare facilities. GNLP Policy 4 seeks to deliver improvements to healthcare infrastructure and improved public transport, which could potentially improve site end users' access to GP surgeries. Policies CSU2, CSU3 (Broadland), DM1.2 and DM3.16 (South Norfolk) seek to ensure community facilities including healthcare are provided and avoid the loss of existing facilities.	The policies would be likely to reduce adverse effects associated with access to GP surgeries for Sites GNLP5005 and GNLP5023 (in Wymondham) and Site GNLP0581/2043GT (in the outskirts of Norwich City). These policies would not be expected to fully mitigate the restricted access to GP

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
	Policies TS1, TS2, CG4, H5 (Broadland), DM3.8 and DM3.10 (South Norfolk) would be expected to improve connections to public transport and incorporate travel plans where required. These policies could potentially provide improved bus links to healthcare facilities. Policies DM3.3 (South Norfolk) and H6 (Broadland) would be expected to ensure future residents of the proposed Gypsy and Traveller sites are not overly isolated from settlements and can access facilities to meet their daily needs, which could potentially include GP surgeries.	surgeries for the other sites in the smaller, more rural settlements in South Norfolk and Broadland.
Limited access to leisure facilities and services	GNLP Policies 2 and 4 would be expected to improve access to existing leisure services through provision of safe and sustainable transport links. GNLP Policy 6 seeks to promote leisure industries including through the green infrastructure network, sustainable tourism initiatives, and additional leisure facility provision in Norwich city centre outlined in GNLP Policy 7.1. GNLP Policy 3 would be expected to provide additional opportunities for leisure and recreation through the provision of amenity green infrastructure. Policy RL1 (Broadland), DM2.4, DM2.5, DM2.9 and DM3.15 (South Norfolk) would be expected to provide recreational space and support the development of leisure proposals in appropriate locations. Policies TS1, TS2, CG4, H5 (Broadland), DM3.8 and DM3.10 (South Norfolk) would be expected to improve connections to public transport and incorporate travel plans where required. These policies could potentially provide improved bus links to leisure facilities.	These policies would not be expected to fully mitigate the existing restricted access to these services as all sites, except Site GNLP5005, are located in rural areas, or significantly outside the sustainable target distance to leisure facilities.
Exposure to air pollution from main road	GNLP Policy 2 seeks to protect air quality, which includes the provision of electric vehicle infrastructure. Policy EN4 (Broadland) and DM3.14 (South Norfolk) seek to ensure that development proposals do not result in an unacceptable impact on air quality or noise pollution. Policy DM3.3 (South Norfolk) seeks to ensure that proposals for new Gypsy and Traveller sites are not approved where there are unsafe localised pollution levels.	These policies would not be expected to fully mitigate the impacts of transport associated emissions from new development on health for development proposals located in close proximity to main roads.
Limited access to public greenspace	GNLP Policy 2 seeks to ensure that all development contributes towards multi-functional green infrastructure links. GNLP Policy 3 would be expected to ensure that developments provide, or provide funding for, significantly higher amounts of appropriate amenity green infrastructure to protect Habitats sites identified within the HRA. Policies EN2, EN3, RL1 (Broadland), DM1.2, DM1.4, DM3.15, DM4.4 (South Norfolk), DM2, DM3, DM8, DM26 and DM33	These policies would be expected to mitigate the limited access to public greenspace and community open spaces.

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
	(Norwich) would help to ensure that all residential development proposals have good access to outdoor space, and that development would avoid the loss of existing open spaces.	

5.10 SA Objective 9 – Crime

5.10.1 The SA process has not identified any significant adverse impacts on crime as a result of the development of reasonable alternative sites. However, measures outlined in policies could potentially enhance the sustainability performance under this objective (see **Table 5.8**).

Table 5.8: *Identified adverse impacts and potential mitigation for SA Objective 9 - Crime*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
No significant adverse impacts on deprivation anticipated	GNLP Policy 2 promotes the development of inclusive, resilient and safe communities. Policies GC4 (Broadland), DM3.8 and DM4.9 (South Norfolk) seek to create safe environments by using designs which address crime prevention and the safety of communities.	These policies would be anticipated to have a minor positive impact on crime across Greater Norwich.

5.11 SA Objective 10 – Education

5.11.1 **Table 5.9** presents the identified adverse impacts on education and the likely impacts post-mitigation.

Table 5.9: *Identified adverse impacts and potential mitigation for SA Objective 10 - Education*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
Limited access to primary schools	GNLP Policy 7.1 would support the development of a new primary school in Norwich and would be expected to ensure school capacity is increased throughout the Plan area in order to meet the identified needs. GNLP Policy 2 would be expected to provide improved safe and sustainable access to local schools across the Plan area. GNLP Policy 7.4 seeks to ensure that safe routes to schools are provided in rural communities, and along with GNLP Policy 7.5, seeks to ensure that any windfall development will be limited by the capacity of local primary schools. Policies CSU2, CSU3 (Broadland) and DM3.16 (South Norfolk) would also be expected to encourage the siting of new residential development in areas with good access to primary education, and the provision of new community facilities which could potentially include new primary schools.	These policies would be expected to improve access to primary schools, to some extent. However, detail about new primary schools and the capacity of existing primary schools is unknown. Until further detail is available, adverse impacts on sustainable access to primary education cannot be ruled out, particularly for development in rural settlements in Broadland and South Norfolk. Therefore, these policies would not be expected to fully mitigate this impact at this stage of the Plan preparation.

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
	Policy DM3.3 seeks to ensure Gypsy and Traveller sites are located in areas with convenient access to schools, and seeks to ensure that consideration is given to the capacity of local infrastructure and that measures are put in place to address any lack of capacity.	
Limited access to secondary schools	GNLP Policy 4 provides a new high school in the North East growth area and would be expected to ensure school capacity is increased throughout the Plan area in order to meet the identified needs. GNLP Policy 2 would be expected to provide improved safe and sustainable access to local schools across the Plan area, and GNLP Policy 7.4 seeks to ensure that safe routes to schools are provided in rural communities. Policy CSU3 (Broadland) would be expected to help ensure development proposals have good access to secondary education. Policies TS1, TS2, CG4, H5 (Broadland), DM3.8 and DM3.10 (South Norfolk) would be expected to improve connections to public transport and incorporate travel plans where required. These policies could potentially provide improved bus links to secondary schools. GNLP Policy 4 would also be expected to improve access to higher education, through the implementation of a cross valley bus link between University of East Anglia and Norwich Research Park. Policy DM3.3 seeks to ensure Gypsy and Traveller sites are located in areas with convenient access to schools, and seeks to ensure that consideration is given to the capacity of local infrastructure and that measures are put in place to address any lack of capacity.	These policies would be expected to mitigate poor access to secondary schools through delivering a new secondary school in Norwich and improving public transport across the Plan area.

5.12 SA Objective 11 – Economy

5.12.1 **Table 5.10** presents the identified adverse impacts on the economy and the likely impacts post-mitigation.

Table 5.10: *Identified adverse impacts and potential mitigation for SA Objective 11 - Economy*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
Net loss of employment floorspace	GNLP Policy 6 seeks to improve employment opportunities across the Plan area in order to meet the identified need. It would be anticipated that this would mitigate any loss of employment floorspace as a result of residential development proposed with the GNLP, through the retention of a range of existing small and medium scale employment sites and encouraging provision of small-scale business opportunities in residential and commercial developments. GNLP Policy 2 could help to provide opportunities for working at home through allowing the delivery of broadband and fibre optic networks. Policies E1, E2, H4 (Broadland), DM2.1, DM2.2 and DM2.3 (South Norfolk) would be expected to ensure that existing employment sites are protected and that new employment opportunities are provided in line with local needs, including the promotion of home working.	These policies would be expected to ensure that any loss of active employment floorspace would be mitigated.
Limited access to primary employment location	GNLP Policy 4 would be expected to provide improved safe accessibility and infrastructure links to key employment areas including the Cambridge Norwich Tech Corridor and town centres and promote the growth of Norwich International Airport. GNLP Policy 6 seeks to meet the identified employment need and provide a range of small, medium and start-up business opportunities, as well as encourage the provision of local working opportunities within new and existing developments. Policy DM2.1 (South Norfolk) would be anticipated to ensure accessible employment opportunities are provided alongside new development. Furthermore, through seeking to encourage home working (Policy H4 in Broadland and DM2.3 in South Norfolk) this would contribute towards a reduced need to travel to work.	Overall, these policies would be expected to mitigate restricted access to employment opportunities throughout the Plan area.

5.13 SA Objective 12 – Transport and Access to Services

5.13.1 **Table 5.11** presents the identified adverse impacts on transport and access to services and the likely impacts post-mitigation.

Table 5.11: *Identified adverse impacts and potential mitigation for SA Objective 12 – Transport and Access to Services*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
Limited access to bus stops	GNLP Policy 4 would be expected to improve access to bus stops through the implementation of the Transport for Norwich Strategy, including improvements to the bus network, developing the Park and Ride system, and providing a new cross valley bus link to the University of East Anglia. Policies TS1, TS2, CG4, H5 (Broadland), DM3.8 and DM3.10 (South Norfolk) would be expected to improve connections to public transport and incorporate travel plans where required.	These policies would be expected to mitigate restricted access to bus services and ensure that all residents have adequate public transport accessibility.
Limited access to train stations	GNLP Policy 4 promotes the enhancement of rail services, including improved journey times to London and Cambridge, and the East-West Rail Link. Improved bus links could potentially provide better connections to railway stations. Policies TS1, TS2, CG4, H5 (Broadland), DM3.8 and DM3.10 (South Norfolk) would be expected to improve connections to public transport and incorporate travel plans where required.	These policies would be expected to improve access to railway stations for development proposals within or in the outskirts of settlements which contain an existing railway station (i.e., Site GNLP0581/2043GT in the outskirts of Norwich City). However, these policies would not be anticipated to fully mitigate the restricted access to railway stations for the remaining sites, in the smaller, more rural settlements in Broadland and South Norfolk.
Lack of safe pedestrian access / access to road network	GNLP Policy 2 promotes safe and sustainable access to on-site and local services and facilities, and GNLP Policy 4 would be expected to improve the cycling and walking network, within the Transport for Norwich Strategy. Policies TS2, TS3, TS6 (Broadland), DM1.2, DM3.8, DM3.10 and DM3.11 (South Norfolk) would be likely to provide safe pedestrian access for all new development and promote highway safety and accessibility. Policy DM3.3 (South Norfolk) would ensure that proposed Gypsy and Traveller sites meet suitable access requirements to the site.	These policies would be expected to mitigate adverse impacts on accessibility, as they would provide improved access to the road, PRoW and cycle networks and facilitate pedestrian access to local facilities.

5.14 SA Objective 13 – Historic Environment

5.14.1 **Table 5.12** presents the identified adverse impacts on the historic environment and the likely impacts post-mitigation.

Table 5.12: *Identified adverse impacts and potential mitigation for SA Objective 13 – Historic Environment*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
Alteration of character or setting of a Listed Building	GNLP Policy 3 seeks to ensure that development proposals do not result in harm to designated and non-designated heritage assets or their historic character and continued or new uses are provided for heritage assets which retain their historic significance. GNLP Policy 2 would be expected to ensure that landscaping measures are incorporated within new developments which consider local characteristics and enhance local landscape, including that of heritage assets. Policies EN2, GC4 (Broadland), DM1.4, DM2.10 and DM4.10 (South Norfolk) would also be expected to ensure that heritage assets including Listed Buildings and their settings are preserved and enhanced in line with their significance. These policies would also help to ensure that development proposals have regard to the character and appearance of the surrounding historic environment within Conservation Areas. Policy DM3.3 (South Norfolk) would help to ensure that proposed developments for Gypsy and Traveller sites do not have a significant impact on heritage assets and their settings and promotes good screening using vegetation and/or landform.	These policies would be expected to mitigate negative impacts on the character and setting of Grade I, Grade II* and Grade II Listed Buildings.

5.15 SA Objective 14 – Natural Resources, Waste and Contaminated Land

5.15.1 **Table 5.13** presents the identified adverse impacts on natural resources, waste and contaminated land and the likely impacts post-mitigation.

Table 5.13: *Identified adverse impacts and potential mitigation for SA Objective 14 – Natural Resources, Waste and Contaminated Land*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
Loss of greenfield sites, land with an ecological or landscape value	GNLP Policy 2 promotes resource efficiency, and GNLP Policy 3 seeks to protect high quality agricultural land. Policies GC4 (Broadland, DM1.4 and DM3.3 (South Norfolk) seek to encourage the efficient use of land and environmental resources, including prioritising development on previously developed land. Policy DM3.3 (South Norfolk) states that there is a preference for Gypsy and Traveller sites located on previously developed land or previously occupied agricultural yards and hard-standings.	All proposed sites for development of Gypsy and Traveller pitches in Greater Norwich, other than GNLP5013, comprise (wholly or partially) previously undeveloped land. These policies would not be expected to fully mitigate the loss of greenfield land.
Loss of best and most versatile soils	GNLP Policy 2 promotes resource efficiency, and GNLP Policy 3 seeks to protect high quality agricultural land. Policies DM2.8, DM2.9 and DM2.12 (South Norfolk) seek to ensure that high quality agricultural land is protected.	These policies would not be expected to mitigate the loss of ALC Grades 1, 2 and 3 land (potential BMV land) in Greater Norwich.

5.16 SA Objective 15 – Water

5.16.1 **Table 5.14** presents the identified adverse impacts on water and the likely impacts post-mitigation.

Table 5.14: *Identified adverse impacts and potential mitigation for SA Objective 15 - Water*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
Risk of contamination of groundwater Source Protection Zones	GNLP Policy 2 seeks to protect water quality and support a catchment approach to water management, including the use of sustainable drainage in order to meet high water efficiency requirements. GNLP Policy 3 seeks to conserve and enhance the natural environments, including increasing the provision of green infrastructure, which could potentially help to protect the quality of groundwater. Policies EN4, CSU5 (Broadland) and DM3.14 (South Norfolk), would be expected to ensure that all new developments include sustainable drainage, and that groundwater quality and aquifers are protected from pollution. Policy DM3.3 (South Norfolk) would ensure that Gypsy and Traveller sites include the provision of satisfactory foul and surface drainage, water supply and utilities.	Together, these policies would be expected to mitigate negative impacts associated with development on nearby groundwater SPZs.
Risk of contamination of watercourses	GNLP Policy 2 seeks to protect water quality and support a catchment approach to water management, including the use of sustainable drainage in order to meet high water efficiency requirements. GNLP Policy 3 seeks to conserve and enhance the natural environments, including increasing the provision of green infrastructure, which could potentially help to protect the quality of watercourses, and reduce the likelihood of pollutants entering watercourses. Policy 7.1 seeks to ensure development near the River Wensum is in accordance with the River Wensum Strategy which would be expected to prevent the worsening of water quality at this river. Policies EN1, EN4, CSU5 (Broadland) and DM1.4, DM2.9, DM3.14, DM4.2 (South Norfolk) would be anticipated to ensure that development proposals do not result in a deterioration of water quality. Policy DM3.3 (South Norfolk) would ensure that Gypsy and Traveller sites include the provision of satisfactory foul and surface drainage, water supply and utilities.	These policies would not be expected to fully mitigate the potential adverse impacts on the contamination of some watercourses.

5.17 Post-mitigation site assessments

5.17.1 Following careful consideration of the mitigating effects of the GNLP strategic policies, Gypsy and Traveller site policies and adopted Local Plan DM policies on the assessment findings, the post-mitigation assessment findings for the 12 reasonable alternative Gypsy and Traveller sites considered in this report have been presented in **Table 5.15**.

5.17.2 The post-mitigation impacts indicate the optimal sustainability performance of each Gypsy and Traveller site, based on information available at the time of writing.

Table 5.15: *Post-mitigation impacts of each site identified in the SA Report*

Site Reference	SA Objective														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5004	0	+	+/-	0	+	0	+	--	+	-	0	-	0	-	0
GNLP5005	-	+	+/-	0	+	+	+	-	+	-	+	+	0	-	-
GNLP0581/2043GT	+/-	+	+/-	-	+	0	+	-	+	+/-	+	0	0	-	0
GNLP5013	0	+	+/-	+	+	0	+	-	+	-	+	-	0	+	0
GNLP5014	0	+	+/-	0	+	0	+	--	+	-	+	+	0	-	0
GNLP5019	0	+	+/-	0	+	0	+	--	+	-	+	-	0	-	0
GNLP5020	0	+	+/-	0	+	0	+	--	+	-	0	-	0	-	0
GNLP5021	0	+	+/-	0	+	+	+	--	+	-	+	-	0	-	0
GNLP5022	0	+	+/-	0	+	0	+	--	+	-	+	-	0	-	0
GNLP5023	-	+	+/-	-	+	0	+	-	+	-	+	0	0	-	-
GNLP5024	0	+	+/-	0	+	0	+	--	+	-	0	-	0	-	0

5.17.3 All 12 reasonable alternative Gypsy and Traveller sites have been identified as resulting in negative impacts on some SA Objectives, although the majority of these are considered to be minor.

5.17.4 The best performing option could be identified as Site GNLP5013, because after the potential mitigating influence of the GNLP policies is taken into account, no major negative scores are identified, and positive scores are identified overall for seven of the 15 SA Objectives. However, the assessment of this site has also identified the potential for minor negative impacts across five SA Objectives. Site GNLP5005 also performs relatively well, with positive scores for seven SA Objectives but five minor negative scores.

5.17.5 A major negative impact has been identified for Sites GNLP5004, GNLP5014, GNLP5019, GNLP5020, GNLP5021, GNLP5022 and GNLP5024 under SA Objective 8, owing to the rural location of these sites, outside of sustainable target distances to healthcare facilities. Sites GNLP5014 and GNLP5021 could be identified as the worst performing out of the sites, as they both have one major negative impact and four minor negative impacts identified post-mitigation; although, the majority of SA Objectives have been identified as negligible or minor positive for these sites.

5.17.6 There is a degree of uncertainty regarding the impacts of all sites on biodiversity (SA Objective 3) owing to the emerging mitigation strategy regarding nutrient neutrality issues within Norfolk. Site GNLP5023 wholly coincides with priority habitat, and as such, there is also uncertainty regarding the potential to mitigate the proposed development at this location. Furthermore, at this stage, the impacts that could arise at Site GNLP0581/2043GT are uncertain for some SA Objectives, as the exact location of the Gypsy and Traveller pitches within the wider Costessey Contingency Site are unknown at the time of writing.

5.18 Recommendations

5.18.1 The proposed site allocation policies currently provide an overview of requirements to be taken into account upon development of each site. Recommendations to improve the site policies have been presented within the assessment text for each policy in **Chapter 4**.

6 Preferred Options

6.1 Reasonable alternatives

6.1.1 The SEA Regulations require that the SEA process considers "*reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme*" (Regulation 12) and gives "*an outline of the reasons for selecting the alternatives dealt with*" (Schedule 2).

6.1.2 The SEA process must record how reasonable alternatives were identified, described, and evaluated. The plan makers must identify all reasonable alternatives, providing an explanation as to their provenance and qualities that qualify them as reasonable.

6.1.3 The findings of the SEA can help with refining and further developing these options in an iterative and on-going way. The SEA findings do not form the sole basis for decision-making; other studies, the feasibility of the option and consultation feedback will also contribute to the decision of identifying a preferred option.

6.2 Site identification and screening

6.2.1 GNDP's identification of reasonable alternative sites for Gypsy and Traveller sites has been carried out through a 'Call for Sites' exercise in 2016 and various Regulation 18 consultations carried out during the plan making process. However, prior to submitting the GNLP for independent examination in July 2021 no Gypsy and Traveller sites had been submitted for consideration.

6.2.2 Since the GNLP has been at examination work has been ongoing to identify Gypsy and Traveller sites. Discussions have taken place with various public and private landowners, as well as contacting the Gypsy and Traveller community directly. The result is that 12 reasonable alternative sites are identified, which are proposed by landowners who indicate a commitment to delivering them, and as such, these 12 sites have been considered in the SA process.

6.2.3 Three further sites were submitted in autumn 2021 via a public consultation for the South Norfolk Village Clusters Housing Allocations Plan (VCHAP) but they are considered unreasonable and are outside the scope of this SA process. These being sites previously dismissed on appeal for Gypsy and Traveller sites.

6.3 Selection and rejection of reasonable alternative sites

6.3.1 Following consideration of the SA information, in addition to other evidence base documents, ten Gypsy and Traveller sites are preferred for allocation in the emerging GNLP. One site is allocated as a contingency site, and one as a reasonable alternative.

6.3.2 **Table 6.1** presents an outline of the reasons for selecting each of the sites, provided by the Councils, in accordance with the requirements of the SEA Regulations.

Table 6.1: *Reasons for selection of each reasonable alternative Gypsy and Traveller site*

Site Reference & Name	Selected/ rejected	Outline reason (provided by the Councils)
GNLP5004 – Land off Buxton Road, Eastgate	**Selected**	This is a greenfield site which could provide 4 pitches for Gypsies and Travellers and does not have any major constraints to make the site unsuitable for development, therefore subject to achieving an acceptable visibility splay and undertaking site investigations as per the findings of the site assessment process GNLP5004 is considered suitable for allocation, subject to public consultation and further assessment.
GNLP5005 - Wymondham Recycling Centre, Strayground Lane	**Selected**	This site is a brownfield site currently used as Wymondham recycling centre. The landowner intends to close this facility, and thus an opportunity exists to redevelop it for 2 residential Gypsy and Traveller pitches, therefore subject to achieving mitigation measures with respect to water quality and possible contamination as per the findings of the site assessment process GNLP5005 is considered suitable for allocation, subject to public consultation and further assessment.
GNLP0581/2043GT - Land off Bawburgh Lane, north of New Road and east of the A47, Costessey (Contingency Site)	**Selected – Contingency Site**	This is a greenfield site being promoted as part of a residential led urban extension of approximately 800 homes site (ref: GNLP0581/2043). GNLP0581/2043GT is a variation of the contingency site which would provide 18 pitches for Gypsies and Travellers. The exact location of the Gypsy and Traveller site within the contingency site is yet to be determined and will be considered as part of master-planning exercise for the overall urban extension.
GNLP5013 – Ketteringham Recycling Centre (revised area)	**Selected – Reasonable Alternative**	This site is currently a depot facility but the landowner proposes to relocate, meaning the land could come forward as a Gypsy and Traveller site for 10 pitches. Due to this situation the deliverability of GNLP5013 is less certain and there are the constraints of the site itself. It is less accessible by walking and cycling because it is separated by the A11 from the nearest services and facilities in Hethersett, and there could be issues of contamination due to previous uses of the land. These factors mean GNLP5013 is a less favoured site but it could still be suitable to allocate, especially if other favoured site are withdrawn. GNLP5013 merits consultation and is selected as a reasonable alternative for further public consultation.
GNLP5014 – Land adjacent to A47	**Selected**	This is a newly proposed piece of land that is currently in agricultural use. Upon the dualling of the A47 and construction of a new junction with the B1140 (South Walsham Road) this land will be surplus for farming and the landowner is willing to bring forward a new Gypsy and Traveller site for 15 pitches. The site has some constraints, which are to do with its proximity to the A47, but issues to do with noise, air quality, and landscaping appear to be mitigatable. Subject to the A47 road improvement scheme going ahead, public consultation and further assessment, GNLP5014 appears suitable for allocation.
GNLP5019 – Land at Woodland Stable, Shortthorn Road, Stratton Strawless	**Selected**	This site currently comprises 9 pitches and a community building. The proposal is to submit a revised scheme for 8 pitches on an area of land that has been granted permission for 4 pitches. The proposal would expand the site to a total of 17 pitches. While somewhat remote from services, this is an existing Gypsy and Traveller site which the owners would be likely to progress quickly.
GNLP5020 – Land at Romany Meadow, The	**Selected**	This site currently comprises 6 pitches and the proposal is to expand on adjacent land to provide up to an additional 6 pitches. The site is not

Site Reference & Name	Selected/ rejected	Outline reason (provided by the Councils)
Turnpike, Carleton Rode		without constraints, which includes no walking route to services and facilities, but its allocation could be suitable subject to achieving mitigation measures and further public consultation. If approved, the Romany Meadow site would grow to a total of 12 pitches.
GNLP5021 – The Old Produce Shop, Holt Road, Horsford	**Selected**	This is an existing Gypsy and Traveller site for 1 pitch and the landowner wants to expand by adding a further 6 pitches. The land was previously a shop selling fruit and vegetables but has been a private Gypsy and Traveller site for nearly 10 years. The site already has a suitable access to the Holt Road, and since the site's original permission the Holt Road has been stopped-off to through traffic, following the construction of the A1270 Broadland Northway. Whilst disconnected from the nearest facilities in Horsford there are no constraints that would rule out adding further pitches development. Subject to public consultation and further assessment, GNLP5021 appears suitable for allocation and new pitches could be delivered within 5 years.
GNLP5022 – The Oaks, Foulsham	**Selected**	This site currently has 2 pitches and Broadland District Council is discussing regularising all the development on the site with the landowner. The landowner wants to expand the site by 5 pitches, bringing the total number of pitches to 7. The site is not without constraints, which includes no walking route to services and facilities, limitations on the access and surrounding road network, the presence of a gas pipeline, and some surface water flood risk on a part of the land. Development would need to be in the northern part of the site, as the gas pipeline runs east to west below the central part of the site. Despite these matters development potential is not ruled out, and so subject to achieving mitigation measures and public consultation, its allocation is suitable and additional pitches could come forward quickly over the next 1-3 years.
GNLP5023 – Strayground Lane, Wymondham	**Selected**	This is a newly proposed piece of land south of the Wymondham Recycling Centre, on Strayground Lane, for 10 pitches. Considerations for the site are highways constraints along Strayground Lane, the proximity to the Bays River Meadow County Wildlife Site, the possibility of contaminated land from the former landfill site, and neighbouring land uses. Subject to achieving mitigation measures for these constraints GNLP5023 is considered suitable for allocation, subject to public consultation and further assessment. 10 pitches is considered to be appropriate given the highway constraints posed by the narrowness of Strayground Lane and Whartons Lane and delivery would be likely to need to be delayed until after the waste and recycling centre has closed.
GNLP5024 – Upgate Street, Carleton Rode	**Selected**	This is an existing Gypsy and Traveller which currently comprises 2 pitches and the proposal is to expand within the current curtilage of the site by 4 pitches to grow the site to a total of 6 pitches. Considerations of the site includes the site access, that there is no walking route to services and facilities, there is a nearby SSSI and county wildlife site, and the site is adjacent to the Bunns Bank linear earthwork which elsewhere in its course is a Scheduled Monument. Nevertheless, these issues appear to mitigatable and if allocated additional pitches would be deliverable within 5 years.

6.4 Reasonable alternative policies

6.4.1 The Councils have identified GNLP5013 as a reasonable alternative, and have identified an update to Policy GNLP0581/2043 relating to the proposed contingency site at Costessey.

6.4.2 Site GNLP5013 at Ketteringham is not part of the favoured approach, due to concerns over accessibility and integrations with neighbouring uses, although potential remains for this site. There are constraints to do with the site becoming vacant, due to the existing depot facility that operates from there, and also because there are constraints to do with access to services, and the possibility of contaminated land on site.

6.4.3 Regarding the Costessey contingency site, this relates to a large site in Costessey which is identified as a contingency site for housing in the submitted GNLP. The role of the contingency site has been discussed at the examination. The inspectors' conclusions on this have not yet been released. Subject to agreement from the landowners, the southern portion of the site is identified as a potential broad contingency location for a Gypsy and Traveller site. To ensure good planning, the need for a Gypsy and Traveller site at this broad location would need to be evidenced if and when the wider contingency site for housing is brought forward for development. For this site, uncertainty about delivery is the main constraint, because the promoters of this land have said construction of a Gypsy and Traveller site is dependent upon the entire development of circa 800 homes coming forward.

6.4.4 Each of the proposed site policies within the 'Site Policies for Gypsy and Traveller Permanent Residential Pitches Focused Consultation' document are deemed necessary in order to ensure that the identified need is addressed in the most sustainable way and that sites are deliverable, with policy criteria to address site-specific requirements. The Councils believe that a 'do nothing' approach for assessing these proposed site policies would not reflect the objective evidence.

7 Next steps

7.1 Consultation

7.1.1 This SA Report is subject to a six-week focused consultation alongside the GNLP 'Site Policies for Gypsy and Traveller Permanent Residential Pitches Focused Consultation' document, the Gypsy and Traveller Site Assessment Booklet, HELAA Addendum and the HRA.

7.1.2 Following the consultation period, responses will be considered by the Councils to inform the emerging GNLP as the examination stage progresses.

Appendix A: SA Framework

Theme	Over-arching Objective	Decision making criteria for site allocations and general polices	Suggested indictors
Air Quality and Noise (ref: SA1)	Minimise air, noise and light pollution to improve wellbeing.	• Will it have a significant impact on AQMAs in Norwich city central and Hoveton? • Will it minimise impact on air quality? • Will it minimise the impact of light and noise pollution?	• Concentration of selected air pollutants: a) NO_2 b) PM_{10} (particulate matter)
Climate Change Mitigation and Adaptation (ref: SA2)	Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change.	• Will it minimise CO_2 emissions? • Will it support decentralised and renewable energy generation? • Will it minimise the risk of fluvial or surface water flooding?	• CO_2 emissions per capita • Sustainable and renewable energy capacity permitted by type • Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence or water quality grounds
Biodiversity, Geodiversity and Green Infrastructure (ref: SA3)	Protect and enhance the area's biodiversity and geodiversity assets and expand the provision of green infrastructure.	• Will it minimise impact on designated sites and important species and habitats? • Could it provide opportunities for bio- or geo-diversity enhancement? • Could it contribute to green infrastructure networks? • Will it help minimise the impact on air quality at designated sites? • Will it ensure that current ecological networks are no compromised and future improvements in habitat connectivity are not prejudiced?	• Net change in Local Sites in "Positive Conservation Management" • Percentage of SSSIs in: a) favourable condition; b) unfavourable recovering; c) unfavourable no change; d) unfavourable declining; or e) destroyed/ part destroyed. • Number of Planning Approvals granted contrary to the advice of Natural England or Norfolk Wildlife Trust (on behalf of the County Wildlife Partnership) or the Broads Authority on the basis of adverse impact on site of acknowledged biodiversity importance.
Landscape (ref: SA4)	Promote efficient use of land, while respecting the variety of landscape types in the area.	• Will it minimise impact on the landscape character of the area, including the setting of the Broads? • Will it enable development of previously developed land? • Will it make efficient use of land?	• Percentage of new and converted dwellings on Previously Developed Land • Number of Planning Approvals granted contrary to the advice of the Broads Authority on the basis of adverse impact on the Broads Landscape

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Theme	Over-arching Objective	Decision making criteria for site allocations and general polices	Suggested indictors
Housing (ref: SA5)	Ensure that everyone has good quality housing of the right size and tenure to meet their needs.	• Will it ensure delivery of housing to meet needs in appropriate locations? • Will it deliver affordable housing and other tenures to meet needs? • Will it ensure a variety in the size and design of dwellings, to meet a range of circumstances and needs?	• Net housing completions • Affordable housing completions • House completions by bedroom number, based on the proportions set out in the most recent Sub-regional Housing Market Assessment • Starter Homes completions
Population and Communities (ref: SA6)	Maintain and improve the quality of life of residents.	• Will it enhance existing, or provide new community facilities? • Will promote integration with existing communities?	• Distance and accessibility to key services and amenities • Hectares of accessible open space per 1,000 population
Deprivation (ref: SA7)	To reduce deprivation.	• Will it help to reduce deprivation?	• Indices of Multiple Deprivation/Lower Super Output Areas • Health indicators
Health (ref: SA8)	To promote access to health facilities and promote healthy lifestyles.	• Will it maximise access to health services, taking into account the needs of an ageing population? • Will it promote healthy lifestyles? • Will it avoid impact on the quality and extent of existing assets, such as formal and informal footpaths?	• Total hectares of accessible public open space (cumulative) provided as a consequence of a planning condition, S106 obligation or CIL investment within the plan period • Percentage of physically active adults • Access to health facilities • Local air quality
Crime (ref: SA9)	To reduce crime and the fear of crime.	• Will it help design out crime from new development?	• Indices of Multiple Deprivation/Lower Super Output Areas • Rates of crime
Education (ref: SA10)	To improve skills and education.	• Will it enable access to education and skills training?	• Local educational attainment levels • Proximity to primary and secondary schools • Capacity of primary and secondary schools • Access to higher education opportunities
Economy (ref: SA11)	Encourage economic development covering a range of sectors and skill levels to improve employment opportunities for residents and maintain and enhance town centres.	• Will it promote Greater Norwich as a regional economic centre? • Will it promote employment land provision to support existing and future growth sectors?	• Amount of land developed for employment by type • Annual count of jobs by BRES across the Plan area • Employment rate of economically active population • Percentage of workforce employed in higher occupations

Theme	Over-arching Objective	Decision making criteria for site allocations and general polices	Suggested indictors
		• Will it promote a range of employment opportunities? • Will it promote vibrant town centres? • Will it promote the rural economy?	
Transport and Access to Services (ref: SA12)	Reduce the need to travel and promote the use of sustainable transport modes.	• Does it reduce the need to travel? • Does it promote sustainable transport use? • Does it promote access to local services? • Does it promote road safety? • Does it promote strategic access to and within the area?	• Percentage of residents who travel to work: a) By private motor vehicle; b) By public transport; c) By foot or cycle; or d) Work at, or mainly at, home. • IMD Access to services and housing
Historic Environment (ref: SA13)	Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment.	• Does it enable the protection and enhancement of heritage assets, including their setting? • Does it provide opportunities to reveal and conserve archaeological assets? • Could it benefit heritage assets currently 'at risk'?	• Percentage of Conservation Areas with appraisals • Heritage at risk – number and percentage of a) Listed buildings; and b) Scheduled Ancient Monuments. on Heritage at Risk register
Natural Resources, Waste and Contaminated Land (ref: SA14)	Minimise waste generation, promote recycling and avoid the sterilisation of mineral resources. Remediate contaminated land and minimise the use of the best and most versatile agricultural land.	• Does it contribute to the minimisation of waste production and to recycling? • Does it safeguard existing and planned mineral and waste operations? • Will it help to remediate contaminated land? • Does it avoid loss of the best and most versatile agricultural land (grades 1-3a)? • Will there be adequate provision for waste and recycling facilities?	• Number of planning permissions granted on non-allocated sites on class 1, 2 or 3a agricultural land • Percentage of land allocated for development, or subject to an extant planning permission of 5 or more dwellings that is identified as Grade 1 or 2 agricultural land value. • Minerals and waste indicators and targets should be informed by the outputs of the adopted Minerals and Waste Plans for Norfolk.
Water (ref: SA15)	Maintain and enhance water quality and ensure the most efficient use of water.	• Will it maximise water efficiency? • Will it minimise impact on water quality? • Will it impact on water discharges that affect designated sites? • Will it contribute to achieving the River Basin Management Plan actions and objectives?	• Water efficiency in new homes • See also flood section (Number of planning permissions contrary to the advice of the Environment Agency on either flood defence or water quality grounds)

Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys

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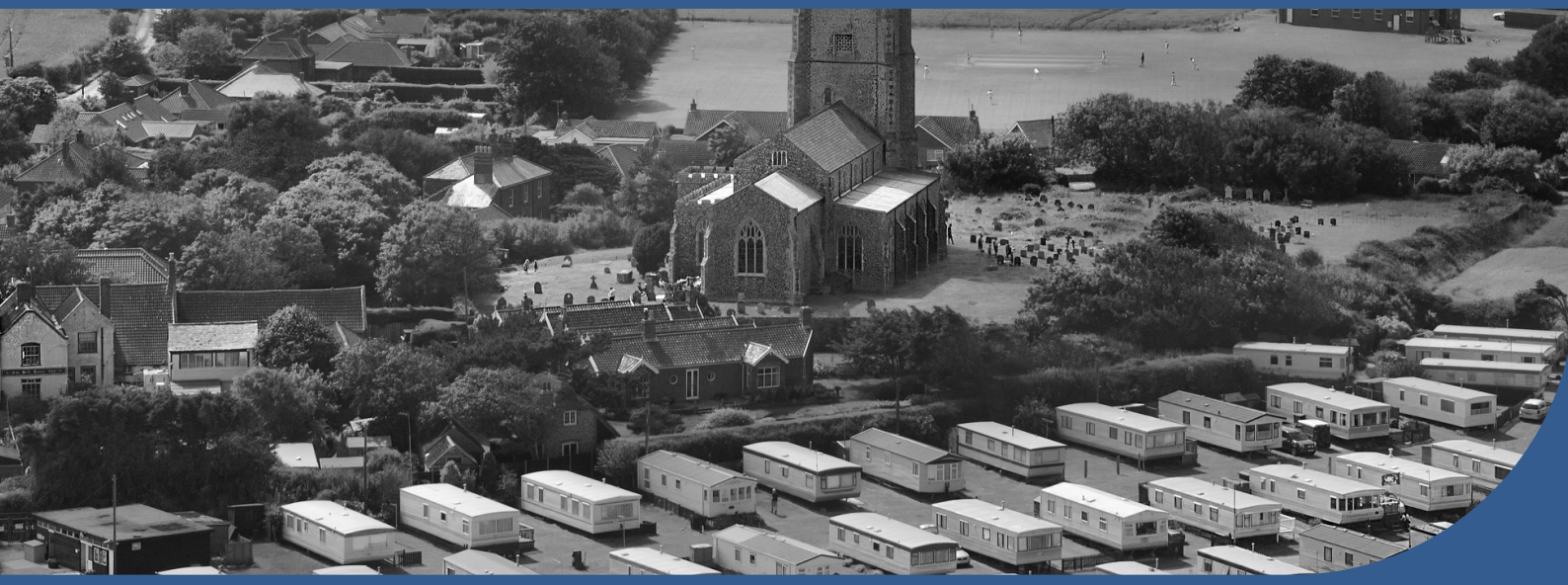

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Habitats Regulations Assessment of published Proposed Submission Greater Norwich Local Plan – Gypsy and Traveller sites Addendum

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Quality standards

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Contents

Non-technical summary **1**

1 Introduction **2**
1.1 The plan being considered and context 2
1.2 The Greater Norwich Local Plan (GNLP) 2
1.3 What are the Habitats Regulations? 3
1.4 Habitats Regulations Assessment process 3
1.5 Why is Appropriate Assessment required? 4
1.6 European sites 5
1.7 Iteration and consultation 6

2 European sites potentially affected **7**
2.1 European sites 7
2.2 Other relevant Plans or Projects potentially affecting these sites 17

3 Likely significant effects of Greater Norwich Local Plan proposed allocations for Gypsy and traveller sites on European sites **19**
3.1 The sites being assessed 19
3.2 Necessary or connected with management of European sites? 19
3.3 Likely significant effects which might arise from policies and allocations within Greater Norwich Local Plan 19
3.4 Conclusion of assessment of likely significant effect ('screening' stage) 20

4 Appropriate Assessment of proposed Gypsy and Traveller sites **21**
4.1 Introduction to the Appropriate Assessment 21
4.2 Assessment of construction impacts on any European site 21
4.3 Increased recreational pressure: potential impacts. 21
4.4 European sites unlikely to be affected by recreational impacts 22
4.5 European sites potentially affected by recreational impacts 23
4.6 Increased pressure on water resources 26
4.7 Pollution impacts: Waste water discharge 27
4.8 Pollution impacts: Additional traffic movements increasing emissions to air 28
4.9 Increased urbanisation of the countryside 32
4.10 Avoidance and mitigation for potential impacts of the proposed Gypsy and traveller sites 33
4.11 Assessment of proposed allocations for Gypsy and traveller sites 36

5 Conclusions **37**
5.1 The Greater Norwich Local Plan with the proposed Gypsy and Traveller site allocations, acting alone 37
5.2 The Greater Norwich Local Plan in combination with other plans or projects 37
5.3 Overall conclusion 37

Figures

1. European site locations

Appendices

1. Conservation Objectives for European sites
2. Gypsy and traveller sites being assessed
3. Nutrient Neutrality information for The Broads SAC / Ramsar, Natural England
4. Nutrient Neutrality information for River Wensum SAC, Natural England
5. Norfolk Local Authorities / Royal Haskoning Nutrient Neutrality information

Non-technical summary

The Landscape Partnership was commissioned by the Greater Norwich Development Partnership to undertake a Habitat Regulations Assessment (HRA) of proposed allocations for Gypsy and Traveller sites, as an addition to the Greater Norwich Local Plan (GNLP). This report is a Habitats Regulations Assessment of that addition to the GNLP. There are ten proposed site allocations for Gypsy and Traveller pitches, a reasonable alternative, and a contingency allocation of 18 pitches at the Costessey contingency housing allocation site. Three unreasonable alternatives are also assessed for completeness.

Impacts considered for the proposed distribution of pitches include water cycles (use and disposal); air pollution, especially from new roads and an increase or change in the pattern of distribution of road users; water pollution or enrichment resulting from discharge to water; and the impacts of increased visitors to European sites. In addition to considering the potential impacts of the growth proposed by the Gypsy and Travellers sites, other development in the GNLP area and the wider area was also considered for in-combination impacts.

No allocations will be within or close to any European site such that there would be construction impacts such as land-take or disturbance from the construction activities, and there will be no allocations within 1.5km of a European site so there would be no direct recreational impacts.

Natural England has advised all Local Planning Authorities in Norfolk that large developments (defined as fifty houses or more) include green space which is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the developed site. No evidence has been provided to support the threshold of 50 or more dwellings, and it is assumed that each and every new home could potentially have an identical impact. Greater Norwich Local Plan requires all residential development to provide green infrastructure. If a development site is too small to provide green infrastructure on site, a contribution secured by S106 to green infrastructure elsewhere will be required. This requirement applies to Gypsy and Traveller sites as well as to standard housing.

The Green Infrastructure and Recreational Impact Avoidance Strategy (GIRAMS) proposes a tariff based payment taken from residential, and other relevant accommodation e.g. tourist accommodation, that will be used to fund packages of avoidance and mitigation measures to be delivered at Habitat Sites. Mitigation comprises a team of Rangers to influence visitor behaviour, signage, monitoring, a dog project, delivery of strategic mitigation projects, and various other measures. A tariff payment of £185.93 per dwelling (Gypsy and Traveller Pitch) has been set. The GIRAMS measures will be sufficient that the assessment is able to ascertain no adverse effect upon the integrity of any European site from the in-combination effects of residential developments across the plan area and beyond.

A new Country Park has been created by Broadland District Council between Felthorpe and Horstead, which is being designed and managed to attract a larger number of recreational visitors. It will also act to reduce visitor pressure on European sites by providing an attractive alternative destination for countryside visits.

There would be no impact on European sites from water abstraction as there would be no additional abstraction to meet water needs in the Local Plan area, including the Gypsy and Traveller sites.

On 16th March 2022, Natural England advised that Wensum SAC and The Broads SAC were being harmed by excess nitrate and phosphate in the water. New residential development would need to demonstrate that it would not exacerbate the existing problem by adding further nitrate and phosphate from sewage and run-off to these SAC sites. This requirement applies to Gypsy and Traveller pitches as well as to standard dwellings. The proposed pitch allocations are therefore in the same situation as housing allocations with respect to Nutrient Neutrality; all pitch allocations are within the catchments of either the River Wensum SAC or The Broads SAC / Ramsar. At the time of writing, it is anticipated that modification to the strategic policies of the GNLP will be made to be available for an Examination hearing. Policy amendments are expected to tie the delivery of housing growth more tightly to nutrient levels impacting on internationally protected habitats, including, as appropriate, a county-wide mitigation strategy. The availability of a mitigation strategy will affect the timing of the delivery of housing sites and Gypsy and Traveller pitches as opposed to the principle of their development. Subject to satisfactory policy modification with respect to Nutrient Neutrality, it is ascertained that the proposed allocations for Gypsy and Traveller sites will have no adverse effect upon the integrity of any European site acting alone, in combination with other development in the GNLP or any other plan or project.

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1 Introduction

1.1 The plan being considered and context

1.1.1 Broadland District Council, Norwich City Council and South Norfolk Council, working with Norfolk County Council and Broads Authority, are working together to prepare the Greater Norwich Local Plan (GNLP). This will replace the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS), which was adopted in March 2011, and other more recently adopted 'lower tier' Development Plan Documents. The three local Planning Authorities have come together to form the Greater Norwich Development Partnership to deliver the GNLP.

1.1.2 The submission draft Greater Norwich Local Plan, and its Habitats Regulations Assessment, were Examined by Inspectors in February and March 2022. The Examination hearings were carried out virtually using internet video calls and the recordings of the hearing can be found at https://www.youtube.com/channel/UCdRKsvFkvWzVLWhEQwY0x0w/videos (accessed on 7th May 2022).

1.1.3 The Inspectors have not yet reported on the Examination. However, various questions have been asked by them of the Greater Norwich Development Partnership, including a question about recent issues regarding Nutrient Neutrality. The question, and the Greater Norwich development Partnership's response, is available on the Examination website[1].

1.1.4 This document is an Addendum to the Greater Norwich Local Plan Habitats Regulations Assessment dated July 2021. Since the Examination hearings, the Greater Norwich Development Partnership has proposed sites to be allocated for Gypsy and Traveller pitches, and a potential allocation for Gypsy and Traveller pitches within the contingency housing allocation at Costessey. **This addendum assesses the impact on European sites of the proposed allocations for Gypsy and Traveller pitches**. The methodology of the assessment is similar to that in the July 2021 HRA, with the exception of now including the assessment of waste water impacts. It is assumed that the impact of one Gypsy and Traveller site is similar to that of one house used by the settled community; there is no evidence to the contrary.

1.1.5 It is considered that there is a need for 53 Gypsy and Traveller pitches within the Plan period[2]. Windfall sites may arise in addition to allocations, to meet demand.

1.2 The Greater Norwich Local Plan (GNLP)

1.2.1 The Submission Draft Greater Norwich Local Plan (GNLP) Strategy document follows previous iterations of the emerging Greater Norwich Local Plan. It provides the broad strategy for growth in Greater Norwich from 2018 to 2038 and supporting thematic policies.

1.2.2 The draft plan identifies where growth needed to 2038 should be built. There are plans in place already which identify locations for around 80% of the new homes, along with new jobs, green spaces and additional infrastructure (Section 1.2 above). The main locations include brownfield sites in Norwich, the major urban extension to its north-east, expanded strategic employment sites such as the Norwich Research Park and growth at most of our towns and larger villages. This plan provides additional sites in these areas to create new communities and support growth of the economy, as well as sites in villages to support rural services.

1.2.3 When adopted, the GNLP will supersede the current Joint Core Strategy and the Site Allocations documents in each of the three districts except for the smaller villages in South Norfolk that will be addressed through a new South Norfolk Village Clusters Housing Allocations Local Plan; and the Diss, Scole and Burston area, for which a Neighbourhood Plan is being produced which will allocate sites in these locations. The GNLP will not replace existing adopted Area Action Plans for Long Stratton, Wymondham and the Growth Triangle (NEGT) or Neighbourhood Plans, though in some cases additional allocations are made through the GNLP in these areas. The GNLP will also not amend existing adopted Development Management policies for the three districts except in

[1] https://www.gnlp.org.uk/local-plan-examination-local-plan-examination-document-library-d-post-submission-examination/d5 accessed on 7th May 2022

[2] RRR Consultancy Ltd (June 2022) Greater Norwich Gypsy and Traveller Accommodation Assessment.

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circumstances where limited policy changes, identified in this plan, are required to implement the strategy.

1.3 What are the Habitats Regulations?

1.3.1 The Conservation of Habitats and Species Regulations 2017 (as amended) generally follow the Birds Directive and Habitats Directive but unlike the Directives there is no role for the European Union; the UK Government has taken that role following the end of the Brexit transition period on 31st December 2020. The following paragraphs consider the case in England only, with Natural England given as the appropriate nature conservation body.

1.3.2 Special Protection Areas and Special Areas of Conservation are defined in the regulations as forming a national network of 'European sites'. The Regulations regulate the management of land within European sites, requiring land managers to have the consent of Natural England before carrying out management. Byelaws may also be made to prevent damaging activities and if necessary land can be compulsorily purchased to achieve satisfactory management.

1.3.3 The Regulations define competent authorities as public bodies or statutory undertakers. Competent authorities are required to make an appropriate assessment of any plan or project they intend to permit or carry out, if the plan or project is likely to have a significant effect upon a European site. The permission may only be given if the plan or project is ascertained to have no adverse effect upon the integrity of the European site. If the competent authority wishes to permit a plan or project despite a negative assessment, imperative reasons of over-riding public interest must be demonstrated, and there should be no alternatives to the scheme. The permissions process would involve the Secretary of State and the option of consulting the European Commission. In practice, there will be very few cases where a plan or project is permitted despite a negative assessment. This means that a plan such as the Greater Norwich Local Plan has to be assessed, and the assessment must either decide that it is likely to have no significant effect on a European site or ascertain that there is no adverse effect upon the integrity of the European site.

1.4 Habitats Regulations Assessment process

1.4.1 A Habitats Regulations Assessment is a step-by-step process which is undertaken in order to determine whether a project or plan will have a likely significant effect (LSE) upon a European site. Before a competent authority can authorise a proposal, they must carry out an Appropriate Assessment of a plan or project in line with procedure detailed in the Habitats Regulations. The whole procedure is called a Habitats Regulations Assessment, with the Appropriate Assessment being part of one of four stages necessary to complete an HRA. The results of the HRA are intended to influence the decision of the competent authority when considering whether or not to authorise a proposal.

Stages of Habitats Regulations Assessment

1.4.2 *Stage One of the HRA is 'Screening'.* Plans or projects will be investigated for their potential to have a likely significant effect upon a European site. If the plan is likely to have a significant effect, and is not connected to the management of the site, an Appropriate Assessment is required. Proposals that are found not likely to have a significant effect upon a European site will be 'screened out' at this stage and no further investigation will be required.

1.4.3 *Stage Two of the HRA is the 'Appropriate Assessment and the Integrity Test'.* The plan-making authority must undertake an Appropriate Assessment which seeks to provide an objective and scientific assessment of how the proposed Local Plan may affect the qualifying features and conservation strategies of European sites. The whole plan must be assessed, but a 'scoping' exercise helps decide which parts of the plan have potential to give rise to significant effects and therefore where assessment should be prioritised. Natural England is an important consultee in this process and the public may also be consulted.

1.4.4 The UK Government accepts the definition for the 'integrity' of a site as *'the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which the site is (or will*

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be) designated.' Other factors may also be used to describe the 'integrity' of a site. The plan-making authority must ascertain, using scientific evidence and a precautionary approach, that the plan will not adversely affect the integrity of a European site, prior to adopting the plan. Information provided in the Appropriate Assessment will be used when considering the Integrity test.

1.4.5 *Stage Three of the HRA is 'Imperative reasons of overriding public interest and compensatory measures'.* If the Competent Authority determines that there are imperative reasons of overriding public interest notwithstanding adverse impacts upon the integrity of the European site, and there are no alternatives, the plan may be given effect. In this case, the plan-making authority must notify the Secretary of State at least 21 days before authorisation; the Secretary of State may give a direction prohibiting the plan from being given effect. It is unlikely that this stage would be reached.

Consultations

1.4.6 Natural England is a statutory consultee, and so should be consulted at the draft and final plan stage. The public may also be consulted if it is considered appropriate, for example if the appropriate assessment is likely to result in significant changes to the plan. In practice, Natural England has been consulted upon previous stages of the Local Plan and HRA, and the HRA has been included in previous public consultations of the emerging Local Plan.

Iterations and revision

1.4.7 The process is iterative; the conclusions of an earlier assessment may result in changes to the plan, and so a revision of the assessment would be required. If the revised assessment suggests further plan changes, the iteration will continue.

1.4.8 Iterative revisions typically continue until it can be ascertained that the plan will not have an adverse affect on the integrity of any European site.

1.4.9 There are further provisions for rare cases where over-riding public interest may mean that a land-use plan may be put into effect, notwithstanding a negative assessment, where there are no alternatives to development, but these provisions are not expected to be routinely used.

Guidance and good practice

1.4.10 This report has taken account of published guidance and good practice. A key source of information which summaries of legislative requirements, good practice guidance and case law (Tyldesley and Chapman 2013, regularly updated)[3] has been used during the writing of this report.

1.5 Why is Appropriate Assessment required?

1.5.1 The appropriate assessment process is required under the Conservation of Habitats and Species Regulations 2017 (as amended). Regulation 105 states that

> (1) Where a land use plan—
>
> (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and
>
> (b) is not directly connected with or necessary to the management of the site,
>
> the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.
>
> (2) The plan-making authority must for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specify.

[3] Tyldesley, D., & Chapman, C. (2013). *The Habitats Regulations Assessment Handbook*. DTA Publications Ltd

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> (3) The plan-making authority must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate.
>
> (4) In the light of the conclusions of the assessment, and subject to regulation 107, the plan-making authority must give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).
>
> (5) A plan-making authority must provide such information as the appropriate authority may reasonably require for the purposes of the discharge by the appropriate authority of the obligations under this chapter.
>
> (6) This regulation does not apply in relation to a site which is—
>
> (a) a European site by reason of regulation 8(1)(c); or
>
> (b) a European offshore marine site by reason of regulation 18(c) of the Offshore Marine Conservation Regulations (site protected in accordance with Article 5(4) of the Habitats Directive.

1.5.2 The plan-making authorities, as defined under the Regulations, are Broadland District Council, Norwich City Council and South Norfolk District Council and the appropriate nature conservation body is Natural England.

1.5.3 This report is the assessment carried out on behalf of these three local authorities under Regulation 105. At Regulation 19 Submission Draft stage, this report determines any changes required so that the GNLP may progress to being adopted in due course.

1.6 European sites

1.6.1 European sites (also known as Natura 2000/N2K sites) are sites that have been classified or designated by Defra/Welsh Ministers or Natural England/Natural Resources Wales, as Special Protection Areas (SPA) for those sites where birds are the special interest feature, and Special Areas of Conservation (SAC) where the habitats or species (other than birds) are the reason for designation.

1.6.2 Wetlands of International Importance, designated under the Ramsar Convention, are not European sites. There may often be considerable overlap between the special interest features and boundaries of Ramsar sites, with European sites. However, for the purposes of planning and development, Government policy in the National Planning Policy Framework states that Ramsar sites should be treated equally/in the same way as European sites. The same applies for sites under consideration for designation including potential Special Protection Area (pSPA), Site of Community Importance (SCI), Candidate Special Area of Conservation (cSAC) and proposed Ramsar sites. In summary, although Appropriate Assessment only legally applies to European sites, National Planning Policy provides further obligations to ensure that all those sites previously mentioned are subject to assessment. Therefore, for the purposes of this report, the term 'European site(s)' refers to all sites under assessment.

1.6.3 As the interest features of the Ramsar sites are usually very similar to the interest features of the SPA and / or SAC designations, both geographically and ecologically, the assessment below, for clarity does not always repeat Ramsar site names. The assessment does however consider Ramsar sites fully, and if an assessment for a Ramsar site was found to differ from that for the respective SPA / SAC, this would be clearly identified.

1.6.4 European Marine Site (EMS) is a term that is often used for a SPA or SAC that includes marine components (i.e. land/habitats up to 12 nautical miles out to sea and below the Mean High Water Mark). A European Marine Site does not have a statutory designation of its own but is designated for the same reasons as the relevant SPA or SAC, and because of this they are not always listed as a site in their own right, to save duplication. For the purpose of this document, an EMS is referred to as an Inshore SPA (or SAC) with Marine Components and it will be made clear if an SPA/SAC has marine components.

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1.7 Iteration and consultation

1.7.1 An interim Habitats Regulations Assessment (HRA)[4] was published in January 2018. It is available on Greater Norwich Development Partnership's website[5]. It identifies in detail how internationally designated ecological habitats and wildlife sites in the wider area, including the Broads and the Norfolk coast, would be potentially impacted by recreational pressures likely to be generated by growth in Greater Norwich. It looked at 22 strategic growth options.

1.7.2 This report was issued to stakeholders, and a meeting was held with stakeholders on 3rd April 2018. Attendees were John Hiskett (Norfolk Wildlife Trust) and Andrea Kelly (Broads Authority) with Nick Sibbett (The Landscape Partnership (TLP)) and Paul Harris (Broadland District Council) representing Greater Norwich Development Partnership.

1.7.3 A second stakeholder meeting was held on 28th March 2019. Attendees were Nick Sibbett (TLP, for Greater Norwich Development Partnership), Paul Harris (Broadland District Council, for Greater Norwich Development Partnership), Mike Jones (Norfolk Wildlife Trust), Kate Warwick (Environment Agency), Louise Oliver (Natural England), and Philip Pearson (RSPB).

1.7.4 Anglian Water representatives were unable to attend the stakeholder meetings but provided advice by email.

1.7.5 A Habitats Regulations Assessment for the Regulation 18 Draft Plan dated December 2019 was published in January 2020. It was open for public consultation with the draft Local Plan from 29 January - 16 March 2020. Comments on the HRA were received from Natural England and Norfolk Wildlife Trust. Comments on the Local Plan relating to HRA issues were also received from RSPB. Concerns were expressed on a number of topics such as whether the Local Plan policies were strong enough to prevent harm to European sites, over-reliance on studies not yet completed including Water Cycle Study and Green Infrastructure Recreation Avoidance Strategy, and impact of the Norwich Western Link Road.

1.7.6 A Habitats Regulations Assessment for the Regulation 19 Submission Draft Plan dated December 2020 was published in February 2021. It was open for public consultation with the Proposed Submission Draft Local Plan from 1st February 2021 – 22nd March 2021. At that time the Habitats Regulations identified that the Water Cycle Study and GIRAMS were in draft stage. The Regulation 19 version (July 2021) of the HRA was amended following completion of the Water Cycle Study and updating the position of the GIRAMS for adoption by the local planning authorities.

[4] Interim Habitats Regulations Assessment of Greater Norwich Local Plan Issues and Options stage, The Landscape Partnership, December 2017
[5] https://gnlp.jdi-consult.net/documents/pdfs_14/reg.18_gnlp_interim_hra.pdf

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2 European sites potentially affected

2.1 European sites

2.1.1 A search using Natural England's Interactive 'Magic Map'[6] revealed that a number of European sites lie within, near or partially within the Greater Norwich area, i.e. the land within Broadland District Council (outside the Broads Authority area), South Norfolk District Council or Norwich City Council areas. Each European site is listed below with a brief description of its qualifying features and is shown on Figure 01. Because some of the European sites cross Local Planning Authority boundaries and because some of the European Sites are made up of component Sites of Special Scientific Interest (SSSI) which are located in different Planning Authority areas, no attempt has been made to differentiate those European sites and Ramsar sites which lie within the plan area, which lie within the boundaries of Broadland District, South Norfolk District and Norwich City Council areas and which are within Local Authority Districts beyond these.

2.1.2 Component Sites of Special Scientific Interest forming the European sites, and the European site Conservation Objectives, are presented in Appendix 1.

River Wensum SAC		
Site description summary	**Qualifying features**[7]	
A calcareous lowland river considered one of the best areas in the UK for Ranunculion fluitantis and Callitricho-Batrachion vegetation. Also significant for the presence of Brook Lamprey, Bullhead and Desmoulin's whorl snail. One of the best areas in the UK for the native White-clawed Crayfish. At the upper reaches, run-off from calcareous soils rich in plant nutrients feeds beds of submerged and emerged vegetation characteristic of chalk streams. Lower, the chalk is overlain by boulder clay, resulting in aquatic plant communities more characteristic of rivers with mixed substrates.	3260	Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation
	7210	Calcareous fens with Cladium mariscus and species of the Caricion davallianae
	91E0	Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)
	1092	Austropotamoblus pallipes (White-clawed (or Atlantic steam) Crayfish)
	1163	Cottus gobio (Bullhead)
	1096	Lampetra planeri (Brook Lamprey)
	1016	Vertigo moulinsiana (Desmoulin's whorl snail)

Norfolk Valley Fens SAC		
Site description summary	**Qualifying features**[8]	
A series of valley-head spring-fed fens, typified by black-bog-rush - blunt-flowered rush *Schoenus nigricans - Juncus subnodulosus* mire. There are also transitions to reedswamp, other fen and wet grassland types, and gradations from calcareous fens into acidic flush communities. Plant species present include marsh helleborine *Epipactis palustris*, narrow-leaved marsh-orchid *Dactylorhiza traunsteineri*, and alder *Alnus glutinosa* which forms carr woodland in places	4010	North Atlantic wet heaths with Erica tetralix
	4030	European dry heaths
	6210	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*important orchid sites)
	6410	Molinia meadows on calcareous, peaty, or clayey-silt-laden soils (Molinion caeruleae)

[6] http://magic.defra.gov.uk/home.htm
[7] Taken from the Natura 2000 Standard data form for site UK0012647 River Wensum SAC dated 25-01-16.
[8] Taken from the Natura 2000 Standard data form for site UK0012892 Norfolk Valley Fens SAC dated 25-01-16.

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by streams. Marginal fens associated with pingos-pools originating from the thawing of large blocks of ice at the end of the last Ice Age support several large populations of Desmoulin's whorl snail *Vertigo moulinsiana*.	7150	Depressions on peat substrates of the Rhynchosporion
	7210	Calcareous fens with Cladium mariscus and species of the Caricion davallianae
	7230	Alkaline fens
	91E0	Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)
	1355	Lutra lutra (Eurasian Otter)
	1166	Triturus cristatus (Great Crested Newt)
	1014	Vertigo angustior (Narrow-mouthed whorl snail)
	1016	Vertigo moulinsiana (Desmoulin's whorl snail)

The Broads SAC/ Broadland SPA, Ramsar		
Site description summary	**SAC qualifying features**[9]	
A low-lying wetland complex connecting the Bure, Yare, Thurne, and Waveney River systems. Wetland habitats form a mosaic of open water, reedbeds, carr woodland, grazing marsh, and fen meadow, with an extensive network of medieval peat excavations. The Site boasts a rich array of flora and fauna. The SPA is designated for supporting a number of rare or vulnerable (Article 4.1) Annex I bird species during the breeding season. In addition, the SPA is designated for supporting regularly occurring migratory (Article 4.2) species during the breeding season and over winter.	3140	Hard oligo-mesotrophic waters with benthic vegetation of Chara spp.
	3150	Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation
	6410	Molinia meadows on calcareous, peaty, or clayey-silt-laden soils (Molinion caeruleae)
	7140	Transition mires and quaking bogs
	7210	Calcareous fens with Cladium mariscus and species of the Caricion davallianae
	7230	Alkaline fens
	91E0	Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)
	4056	Anisus vorticulus (Little whorlpool ram's-horn snail)
	1903	Liparis loeselii (Fen Orchid)
	1355	Lutra lutra (Eurasian Otter)
	1166	Triturus cristatus (Great Crested Newt)

[9] Taken from the Natura 2000 Standard data form for site UK0013577 The Broads SAC dated 25-01-16.

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	1016	Vertigo moulinsiana (Desmoulin's whorl snail)
	SPA qualifying features[10]	
	A056	Anas clypeata (Shoveler) (over winter)
	A050	Anas penelope (Wigeon) (over winter)
	A051	Anas strepera (Gadwall) (over winter)
	A021	Botaurus stellaris (Bittern) (breeding)
	A081	Circus aeruginosus (Marsh Harrier) (breeding)
	A082	Circus cyaneus (Hen Harrier) (over winter)
	A037	Cygnus columbianus bewickii (Bewick's Swan) (over winter)
	A038	Cygnus cygnus (Whooper Swan) (over winter)
	A151	Philomachus pugnax (Ruff) (over winter)
	Ramsar qualifying features[11]	
	H7210	Calcareous fens with Cladium mariscus and species of the Caricion davallianae Calcium-rich fen dominated by great fen sedge (saw sedge).
	H7230	Alkaline fens Calcium-rich springwater-fed fens.
	H91E0	Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) Alder woodland on floodplains, and the Annex II species
	S1016	Vertigo moulinsiana (Desmoulin`s whorl snail)
	S1355	Lutra lutra (Eurasian Otter)
	S1903	Liparis loeselii Fen Orchid
		Cygnus columbianus bewickii, NW Europe (Tundra (Bewick's) Swan)
		Anas penelope (Eurasian Wigeon)
		Anas strepera strepera (Gadwall)
		Anas clypeata (Shoveler)

Breydon Water SPA/Ramsar/SPA (Marine)		
Site description summary	**SPA qualifying features**[12]	
An inland tidal estuary at the mouth of the River Yare and its confluence with the Rivers Bure and Waveney. Extensive areas of mud-flats form the only tidal flats on the east Norfolk coast. The Site also features much	A037	Cygnus columbianus bewickii (Bewick's (Tundra) Swan) (over winter)
	A151	Philomachus pugnax (Ruff) (concentration)

[10] Taken from the Natura 2000 Standard data form for site UK9009253 Broadland SPA dated 25-01-16.
[11] Taken from the Ramsar Information Sheet for Broadland dated 21-09-94.
[12] Taken from the Natura 2000 Standard data form for site UK9009181 Breydon Water SPA dated 25-01-16.

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floodplain grassland, which lies adjacent to the intertidal areas. It is internationally important for wintering waterbirds, some of which feed in the Broadland Ramsar that adjoins this site at Halvergate Marshes. This SPA is part of the Breydon Water European Marine Site.	A140	Pluvialis apricaria (Golden Plover) (over winter)
	A132	Recurvirostra avosetta (Avocet) (over winter)
	A193	Sterna hirundo (Common Tern) (breeding)
	A142	Vanellus vanellus (Northern Lapwing) (over winter)
		Waterbird assemblage
	Ramsar qualifying features[13]	
	Internationally important waterfowl assemblage (greater than 20000 birds)	
	Over winter the site regularly supports internationally important numbers of: Bewick's Swan Cygnus columbianus bewickii and Lapwing Vanellus vanellus	

Great Yarmouth North Denes SPA		
Site description summary	**Qualifying features**[14]	
Low dunes stabilised by marram grass *Ammophila arenaria* with extensive areas of grey hair-grass *Corynephorus canescens*. The Site supports important numbers of little tern *Sterna albifrons* that feed in waters close to the SPA. This SPA is part of the Great Yarmouth North Denes European Marine Site (EMS).	A195	Sterna albifrons (Little Tern) (breeding)

Winterton – Horsey Dunes SAC		
Site description summary	**Qualifying features**[15]	
The only significant area of dune heath on the east coast of England, which occur over an extremely base-poor dune system, and include areas of acidic dune grassland as an associated acidic habitat. These acidic soils support swamp and mire communities, in addition to common dune slack vegetation, including creeping willow *Salix repens* subsp. *argentea* and Yorkshire fog *Holcus lanatus*. The drought resistant grey hair-grass *Corynephorus canescens* is characteristic of open areas.	2110	Embryonic shifting dunes
	2120	Shifting dunes along the shoreline with Ammophila arenaria ("white dunes")
	2150	Atlantic decalcified fixed dunes (Calluno-Ulicetea)
	2160	Dunes with Hippophae rhamnoides
	2190	Humid dune slacks
	1166	Triturus cristatus (Great Crested Newt)

[13] Taken from the Ramsar Information Sheet for Breydon Water dated Feb 2000.
[14] Taken from the Natura 2000 Standard data form for site UK9009271 Great Yarmouth North Denes SPA dated 25-01-16.
[15] Taken from the Natura 2000 Standard data form for site UK0013043 Winterton – Horsey Dunes SAC dated 25-01-16.

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Paston Great Barn SAC		
Site description summary	**Qualifying features**[16]	
Nationally, this is an extremely rare example of a maternity roost of barbastelle bats *Barbastella barbastellus* in a building. A 16th century thatched barn with associated outbuildings. The maternity colony inhabits many crevices and cracks in the roof timbers.	1308	Barbastella barbastellus (Barbastelle bat) (permanent population)

Overstrand Cliffs SAC		
Site description summary	**Qualifying features**[17]	
Vegetated soft cliffs composed of Pleistocene clays and sands, subject to common cliff-falls and landslips. Vegetation undergoes cycles whereby ruderal-dominated communities develop on the newly exposed sands and mud, succeeded by more stable grassland and scrub vegetation. In areas where freshwater seepages occur there are fen communities and occasional perched reedbeds. The diverse range of habitats support a large number of invertebrate species.	1230	Vegetated sea cliffs of the Atlantic and Baltic Coasts

Waveney & Little Ouse Valley Fens SAC		
Site description summary	**Qualifying features**[18]	
Calcareous fen containing extensive beds of great fen-sedge *Cladium mariscus*. Purple moor-grass – meadow thistle *Molinia caerulea – Cirsium dissectum* fen-meadows, associated with the spring-fed valley fen systems, occur in conjunction with black bog-rush – blunt-flowered rush *Schoenus nigricans – Juncus subnodulosus* mire and calcareous fens with great fen-sedge. Grazed areas of fen-meadow are more species-rich, and frequently support southern marsh-orchid *Dactylorhiza praetermissa*.	6410	Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)
	7210	Calcareous fens with Cladium mariscus and species of the Caricion davallianae
	1016	Vertigo moulinsiana (Desmoulin's whorl snail)

[16] Taken from the Natura 2000 Standard data form for site UK0030235 Paston Great Barn SAC dated December 2015.
[17] Taken from the Natura 2000 Standard data form for site UK0030232 Overstrand Cliffs SAC dated December 2015.
[18] Taken from the Natura 2000 Standard data form for site UK0012882 Waveney and Little Ouse Valley Fens SAC dated December 2015.

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Redgrave and South Lopham Fens Ramsar	
Site description summary	**Qualifying features**[19]
An extensive area of spring-fed valley fen at the headwaters of the River Waveney which supports a variety of fen plant community types, including *Molinia*-based grasslands, mixed sedge-fen, and reed-dominated fen. Small areas of wet heath, sallow carr, and birch woodland also occur, and the Site is known to support the fen raft spider *Dolomedes plantarius*.	The site is an extensive example of spring-fed lowland base-rich valley, remarkable for its lack of fragmentation.
	The site supports many rare and scarce invertebrates, including a population of the fen raft spider *Dolomedes plantarius*. This spider is also considered vulnerable by the IUCN Red List.
	The site supports many rare and scarce invertebrates, including a population of the fen raft spider *Dolomedes plantarius*. The diversity of the site is due to the lateral and longitudinal zonation of the vegetation types characteristic of valley mires.

Breckland SPA/SAC		
Site description summary	**SPA qualifying features**[20]	
A gently rolling plateau underlain by cretaceous chalk bedrock covered with thin deposits of sand and flint. The climate and free-draining soils has produced dry heath and grassland communities. Pingos with biological interest occur in some areas. The highly variable soils of Breckland, with underlying chalk being largely covered with wind-blown sands, have resulted in mosaics of heather-dominated heathland, acidic grassland and calcareous grassland that are unlike those of any other site. Breckland is the most extensive surviving area of the rare sheep's fescue – mouse-ear hawkweed – wild thyme *Festuca ovina – Hieracium pilosella – Thymus praecox* grassland type. A number of the water bodies within the site support populations of amphibians, including great crested newts *Triturus cristatus*.	A133	Burhinus oedicnemus (Stone Curlew) (breeding)
	A224	Caprimulgus europaeus (Nightjar) (breeding)
	A246	Lullula arborea (Woodlark) (breeding)
	SAC qualifying features[21]	
	2330	Inland dunes with open Corynephorus and Agrostis grasslands
	3150	Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation
	4030	European dry heaths

[19] Taken from the Ramsar Information Sheet for Redgrave and South Lopham Fen Ramsar dated May 2005.
[20] Taken from the Natura 2000 Standard data form for site UK9009201 Breckland SPA dated December 2015.
[21] Taken from the Natura 2000 Standard data form for site UK0019865 Breckland SAC dated December 2015.

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	6210	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)
	91E0	Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)
	1308	Barbastella barbastellus (Barbastelle bat)
	1166	Triturus cristatus (Great Crested Newt)

Benacre to Easton Bavents Lagoons SAC/Benacre to Easton Bavents SPA		
Site description summary	**SAC qualifying features**[22]	
Situated on the east coast of Suffolk, this site includes semi-natural broadleaved woodland, tall fen vegetation, shingle, dunes and grassland, saltmarsh and coastal lagoons. The habitats are important for breeding, wintering and passage birds. There are a series of percolating lagoons that have formed behind shingle barriers and are a feature of a geomorphologically dynamic system. The site supports a number of specialist lagoonal species. The SPA is part of the Benacre to Easton Bavents European Marine Site.	1150	Coastal lagoons
	91E0	Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)
	SPA qualifying features[23]	
	A021	Botaurus stellaris (Bittern) (breeding)
	A081	Circus aeruginosus (Marsh Harrier) (breeding)
	A195	Sterna albifrons (Little Tern) (breeding)
Component SSSI/s[24]		
Pakefield to Easton Bavents SSSI	Covers 735.45ha and contains 51 units. 48.73% of area in Favourable condition, 38.98% of area in Unfavourable-Recovering condition, 8.73% of area in Unfavourable-No change condition, 3.11% Unfavourable-Declining condition, 0.45% of area Partially destroyed.	
SAC Conservation Objectives[25]		
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;	• The extent and distribution of qualifying natural habitats • The structure and function (including typical species) of qualifying natural habitats, and • The supporting processes on which qualifying natural habitats rely.	
SPA Conservation Objectives[26]		
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving	• The extent and distribution of the habitats of the qualifying features	

[22] Taken from the Natura 2000 Standard data form for site UK0013104 Benacre to Easton Bavents Lagoons SAC dated December 2015.
[23] Taken from the Natura 2000 Standard data form for site UK9009291 Benacre to Easton Bavents SPA dated December 2015.
[24] Condition status taken from Natural England data on 17th June 2019.
[25] Taken from Natural England's European Site Conservation Objectives for Benacre to Easton Bavents Lagoons SAC dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice.
[26] Taken from Natural England's European Site Conservation Objectives for Benacre to Easton Bavents SPA dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice, and should be used in conjunction with the Regulation 35 Conservation Advice Package for the EMS.

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the aims of the Wild Birds Directive, by maintaining or restoring;	• The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site.

Dew's Ponds SAC		
Site description summary	**Qualifying features**[27]	
A series of 12 ponds located in rural East Suffolk, in formerly predominantly arable land. Great Crested Newt has been found in all ponds. Some of the arable land has been converted to grassland and there are also hedgerows and ditches.	1166	Triturus cristatus (Great Crested Newt)

The Wash and North Norfolk Coast SAC (inshore)		
Site description summary	**Qualifying features**[28]	
The Wash is the largest embayment in the UK and is connected to the North Norfolk Coast via sediment transfer systems. Together The Wash and North Norfolk Coast form one of the most important marine areas in the UK and European North Sea coast, and include extensive areas of varying, but predominantly sandy, sediments subject to a range of conditions. Communities in the intertidal include those characterised by large numbers of polychaetes, bivalve and crustaceans. Subtidal communities cover a diverse range from the shallow to the deeper parts of the embayments and include dense brittlestar beds and areas of an abundant reef-building worm ('ross worm') Sabellaria spinulosa. The embayment supports a variety of mobile species, including a range of fish, otter Lutra lutra and common seal Phoca vitulina. The extensive intertidal flats provide ideal conditions for common seal breeding and hauling-out. This SAC is part of The Wash and North Norfolk Coast European Marine Site.	1110	Sandbanks which are slightly covered by sea water all the time
	1140	Mudflats and sandflats not covered by seawater at low tide
	1150	Coastal lagoons
	1160	Large shallow inlets and bays
	1170	Reefs
	1310	Salicornia and other annuals colonizing mud and sand
	1320	Spartina swards (Spartinion maritimae)
	1330	Atlantic salt meadows (Glauco-Puccinellietalia maritimae)
	1420	Mediterranean and thermo-Atlantic halophilous scrubs (Sarcocornetea fruticosi)
	1364	Halichoerus grypus (Grey Seal)
	1355	Lutra lutra (Eurasian Otter)
	1365	Phoca vitulina (Harbour/Common Seal)

North Norfolk Coast SPA (marine)/SAC (inshore)/Ramsar		
Site description summary	**SAC qualifying features**[29]	
Important within Europe as one of the largest areas of undeveloped coastal habitat of its	1150	Coastal lagoons

[27] Taken from the Natura 2000 Standard data form for site UK0030133 Dew's Ponds SAC dated December 2015.
[28] Taken from the Natura 2000 Standard data form for site UK0017075 The Wash and North Norfolk Coast SAC dated December 2015.
[29] Taken from the Natura 2000 Standard data form for site UK0019838 North Norfolk Coast SAC dated December 2015.

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type, supporting intertidal mudflats and sandflats, coastal waters, saltmarshes, shingle, sand dunes, freshwater grazing marshes, and reedbeds. Large numbers of waterbirds use the Site throughout the year. In Summer, the Site and surrounding area are important for breeding populations of four species of tern, waders, bittern *Botaurus stellaris*, and wetland raptors including marsh harrier *Circus aeruginosus*. In Winter, the Site supports large numbers of geese, sea ducks, other ducks and waders using the Site for roosting and feeding. The Site is also important for migratory species during the Spring and Autumn. This SAC is part of the North Norfolk Coast European Marine Site. The SPA is designated for supporting a number of rare or vulnerable (Article 4.1) Annex I bird species during the breeding season. In addition, the SPA is designated for supporting regularly occurring migratory (Article 4.2) species during the breeding season and over winter. This SPA is part of The Wash and North Norfolk Coast European Marine Site (EMS).	1220	Perennial vegetation of stony banks
	1420	Mediterranean and thermo-Atlantic halophilous scrubs (Sarcocornetea fruticosi)
	2110	Embryonic shifting dunes
	2120	Shifting dunes along the shoreline with Ammophila arenaria ("white dunes")
	2130	Fixed coastal dunes with herbaceous vegetation ("grey dunes")
	2160	Dunes with Hippophae rhamnoides
	2190	Humid dune slacks
	1355	Lutra lutra (Eurasian Otter)
	1395	Petallophyllum ralfsii (Petalwort)
	1166	Triturus cristatus (Great Crested Newt)
	SPA qualifying features[30]	
	A040	Anser brachyrhynchus (Pink-footed Goose) (over winter)
	A050	Anas penelope (Wigeon) (over winter)
	A021	Botaurus stellaris (Bittern) (breeding)
	A675	Branta bernicla bernicla (Dark-bellied Brent Goose) (over winter)
	A143	Calidris canutus (Red Knot) (over winter)
	A081	Circus aeruginosus (Marsh Harrier) (breeding)
	A132	Recurvirostra avosetta (Avocet) (breeding and over winter)
	A195	Sterna albifrons (Little Tern) (breeding)
	A193	Sterna hirundo (Common tern) (breeding)
	A191	Sterna sandvicensis (Sandwich Tern) (breeding)
	WATR	Waterfowl assemblage
	Ramsar qualifying features[31]	
	The site is one of the largest expanses of undeveloped coastal habitat of its type in Europe. It is a particularly good example of a marshland coast with intertidal sand and mud, saltmarshes, shingle banks and sand dunes. There are a series of brackish-water lagoons and extensive areas of freshwater grazing marsh and reed beds.	

[30] Taken from the Natura 2000 Standard data form for site UK9009031 North Norfolk Coast SPA dated December 2015.
[31] Taken from the Ramsar Information Sheet for North Norfolk Coast dated 13-06-08.

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	Supports at least three British Red Data Book and nine nationally scarce vascular plants, one British Red Data Book lichen and 38 British Red Data Book invertebrates.
	98462 waterfowl peak count in winter (assemblages of international importance)
	Sterna sandvicensis (Sandwich Tern) (breeding)
	Sterna hirundo (Common Tern) (breeding)
	Sterna albifrons (Little Tern) (breeding)
	Calidris canutus (Red Knot) (over winter)
	Anser brachyrhynchus (Pink-footed Goose) (over winter)
	Branta bernicla bernicla (Dark-bellied Brent goose) (over winter)
	Anas penelope (Wigeon) (over winter)
	Anas acuta (Pintail) (over winter)

Southern North Sea cSAC (offshore and inshore)		
Site description summary	**Qualifying features**[32]	
The Southern North Sea site has been recognised as 'an area of predicted persistent high densities of harbour porpoise'. Therefore, the Southern North Sea site has been submitted to the EU and is a candidate for designation as an Inshore and Offshore SAC for the Annex II species, Harbour Porpoise. The Southern North Sea site extends down the North Sea from the River Tyne, south to the River Thames. The aim of the SAC is to support the maintenance of harbour porpoise populations throughout UK waters (the Southern North Sea supports higher number of porpoises compared to many other parts of their UK range). Seasonal differences in the use of the site by harbour porpoises which show the elevated densities of the species in some parts of the site compared to others during the summer and winter, have been identified. The main threats to harbour porpoise are from incidental catch, pollution and noise/physical disturbance.	1351	Phocoena phocoena (Harbour Porpoise)

Outer Thames Estuary SPA (marine)/Outer Thames Estuary Extension pSAC (marine)		
Site description summary	**Qualifying features**[33]	
This SPA is entirely marine and is designated because its habitats support 38% of the Great British population of over-wintering Red-throated Diver *Gavia stellata*, a qualifying species under Article 4.1 of the Birds	A001	Gavia stellata (Red-throated Diver) (over winter)

[32] Taken from the Natura 2000 Standard Data Form for Site UK0030395 Southern North Sea SCI dated January 2017.
[33] Taken from the Natura 2000 Standard Data Form for Site UK9020309 Outer Thames Estuary SPA dated December 2015.

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Directive. The Outer Thames Estuary SPA covers vast areas of marine habitat off the east coast between Caister-on-Sea, Norfolk in the north, down to Margate, Kent in the south. The habitats covered by the SPA include marine areas and sea inlets where Red-throated Diver is particularly susceptible to noise and visual disturbance e.g. from wind farms and coastal recreation activities. Threats from effluent discharge, oil spillages and entanglement/drowning in fishing nets are significant. The addition of two new protected features and associated boundary amendments was consulted on in January to July 2016. The proposed extension would afford protection for Little tern and Common tern foraging areas, enhancing protection already afforded to their feeding and nesting areas in the adjacent coastal SPAs (Foulness SPA, Breydon Water SPA and Minsmere to Walberswick SPA).		

Haisborough, Hammond and Winterton SAC		
Site description summary	**Qualifying features**[34]	
The site lies off the north east coast of Norfolk and contains a series of sandbanks as well as Sabellaria spinulosa reefs. Small numbers of Harbour Porpoise are regularly observed within the site boundary and a large colony of breeding Grey Seal is known adjacent to the site.	1110	Sandbanks which are slightly covered by sea water all the time
	1170	Reefs
	1364	Halichoerus grypus (Grey Seal)
	1351	Phocoena phocoena (Harbour Porpoise)

2.2 Other relevant Plans or Projects potentially affecting these sites

2.2.1 In addition to the potential impact that Greater Norwich Local Plan may have upon the nearby European sites described above, other plans/documents/guidance may also impact upon these sites, in particular the plans of the neighbouring local planning authorities. The most relevant documents are likely to be those concerned with planning policy and infrastructure provision.

2.2.2 The neighbouring local authorities as well as those that contain European sites within the Zone of Influence of the Greater Norwich Growth Area are listed below. Their planning policy documents, including adopted and emerging Local Plans are likely to be the most relevant when considering potential for cumulative impacts upon European sites.

- Broads Authority
- Breckland Council
- Borough Council of King's Lynn & West Norfolk
- North Norfolk District Council
- Great Yarmouth Borough Council
- East Suffolk Council
- Mid Suffolk District Council

[34] Taken from the Natura 2000 Standard data form for site UK0030369 Haisborough, Hammond and Winterton SAC dated December 2015.

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- West Suffolk Council
- South Holland District Council
- Boston Borough Council
- East Lindsey District Council
- Norfolk County Council – Minerals site specific allocations DPD
- South Norfolk Village Clusters Housing Site Allocations Local Plan in progress. This plan will include sites for a minimum of 1,200 homes in addition to the 1,392 already committed in the village clusters.

2.2.3 Plans or projects connected with infrastructure planning and management also have potential to impact European sites, whether alone or in combination. Such plans are listed below and will need to be considered further in the report.

- Greater Norwich Water Cycle Study
- Green Infrastructure Strategy (2007) and Green Infrastructure Delivery Plan (2009)
- River Basin Management Plan for the Anglian Water Basin District (2015)
- North East Norwich Growth Triangle Green Infrastructure Delivery Plan (2016)
- East Broadland Green Infrastructure Delivery Plan (2015)
- West Broadland Green Infrastructure Project Plan (2018)
- Norwich River Wensum Green Infrastructure Strategy (not currently available)
- Green Infrastructure sections of the Wymondham Area Action Plan (2015)
- Green Infrastructure sections of the Long Stratton Area Action Plan (2016)

2.2.4 A Norwich Western Link Road is proposed by Norfolk County Council which is working towards a planning application and subsequent construction. Greater Norwich Local Plan recognises the existence of the proposed road but does not promote the road or take part in decision-making regarding the road's construction. See https://www.norfolk.gov.uk/roads-and-transport/major-projects-and-improvement-plans/norwich/norwich-western-link/ for further details.

2.2.5 Anglian Water's 2019 Water Resource Management Plan outlines how Anglian Water will maintain a sustainable balance between water supplies and demand over the next 25 years. It describes how it proposes to maintain that balance by investing in demand management – metering and water efficiency for example – and developing new water resources. No new boreholes or increase in abstraction from existing boreholes are explicitly proposed.

2.2.6 Anglian Water's Long Term Water Recycling Plan (September 2018) sets out a long term strategy to identify the need for further investment by Anglian Water at existing water recycling centres or within foul sewerage catchments to accommodate the anticipated scale and timing of growth. Growth in Greater Norwich as well as in the remainder of the area served by Anglian Water is included in this plan.

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3 Likely significant effects of Greater Norwich Local Plan proposed allocations for Gypsy and traveller sites on European sites

3.1 The sites being assessed

3.1.1 The proposed allocations for Gypsy and Traveller sites are included in Appendix 2. The allocations are listed in the table below. For completeness of assessment, a reasonable alternative site, a contingency site and unreasonable alternative sites are also included.

Reference	Address	Parish	Number of proposed pitches (approx.)
GNLP5004	Land off Buxton Road, Eastgate	Cawston	4
GNLP5005	Wymondham Recycling Centre off Strayground Lane	Wymondham	2
GNLP5009	Hockering Lane	Bawburgh	6
GNLP5014	Broad location south of A47 improvements	North Burlingham	15
GNLP5019	Woodland Stable, Shortthorn Road	Stratton Strawless	8
GNLP5020	Romany Meadow, The Turnpike	Carlton Rode	6
GNLP5021	The Old Produce, Holt Road	Horsford	6
GNLP5022	The Oaks	Foulsham	5
GNLP5023	Strayground Lane	Wymondham	10
GNLP5024	Upgate Street	Carleton Rode	4
GNLP5013 (Reasonable alternative)	Depot	Ketteringham	10
GNLP0581/2043	Contingency Site access from New Road	Costessey	18
VCHAP GT Site 1 and VCHAP GT site 2 (unreasonable alternatives)	Grove Farm, Middle Road	Denton	
VCHAP GT site 3 (unreasonable alternative)	London Road, Suton	Wymondham	

3.2 Necessary or connected with management of European sites?

3.2.1 It is considered that the Gypsy and Traveller site proposed allocations are not necessary for, or connected with, the nature conservation management of any European sites.

3.3 Likely significant effects which might arise from policies and allocations within Greater Norwich Local Plan

3.3.1 There are a number of potential impacts arising from policies and allocations within the Local Plan. These include

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- Increased recreational pressure: trampling of vegetation or disturbance to birds, or providing difficulties in site management for example.
- Increased pressure on water resources: The new homes and businesses would require a reliable source of drinking water which could affect wetlands from increased abstraction.
- Pollution impacts: Waste water discharge from new developments, including foul water discharges may reduce the water quality of rivers or wetlands.
- Pollution impacts: Additional traffic movements increasing emissions to air such as Nitrogen oxides NOx and Sulphur dioxide SO_2 which have the potential to result in adverse impact upon vegetation or water quality.
- Increased urbanisation of the countryside: predation by cats, fly-tipping, increase in arson, vandalism of European site infrastructure such as fences, disturbance of livestock, etc.

3.3.2 There are no direct land-take impacts on any European site in the allocations.

3.3.3 Impacts arising from any of the above factors upon a designated European site could occur result from development of a single large housing site, for example in the immediate vicinity of Norwich; or through a combination of dispersed developments including the Gypsy and Traveller sites elsewhere in the Growth Area. Some European sites would be more vulnerable to recreational pressure whilst others might be more sensitive to other types of impacts. In isolated incidences, a European designated site may be sensitive to several different types of impact, for example both recreational pressure and an impact upon water resources.

3.3.4 There may be cumulative effects of a large number of smaller developments. For example, the recreational impact on European sites of a small residential development may in itself have imperceptible impact, but the total recreational impact of a number of residential developments could be significant.

3.4 Conclusion of assessment of likely significant effect ('screening' stage)

3.4.1 It is concluded that the proposed allocations for Gypsy and Traveller sites, as part of the Regulation 19 Submission Draft Local Plan, may be likely to have a significant effect upon one or more European sites. The Local Plan is not necessary for, or connected with, nature conservation management of European sites. It is concluded that an appropriate assessment of impacts is necessary.

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4 Appropriate Assessment of proposed Gypsy and Traveller sites

4.1 Introduction to the Appropriate Assessment

4.1.1 This appropriate assessment considers impacts of the Gypsy and Traveller sites individually and collectively, and in the context of the whole Greater Norwich Local Plan. Cumulative impacts with other plans or projects are then considered.

4.2 Assessment of construction impacts on any European site

4.2.1 No allocations are within or close to any European site, so there would not be any construction impacts such as land-take or disturbance from the construction activities.

4.3 Increased recreational pressure: potential impacts.

4.3.1 Recreational use of a European site has the potential to:

- Cause damage to soils and vegetation through trampling and erosion;
- Cause disturbance to sensitive species, particularly ground-nesting birds and wintering wildfowl.
- Cause eutrophication as a result of dog fouling;
- Cause littering, giving rise to potential animal mortality, nutrient enrichment and small-scale pollution
- Prevent appropriate management or exacerbate existing management difficulties, for example grazing being restricted.

4.3.2 Different types of European sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex. Recreational pressure is likely to be generated by an increase in residents associated with the new housing but less so for employment development.

Trampling pressure and mechanical/abrasive damage

4.3.3 Most types of terrestrial European site can be affected by trampling, which in turn causes soil compaction and erosion, depending upon soil conditions, or changes to the vegetation. Motorcycle scrambling and off-road vehicle use can cause serious erosion, as well as disturbance to sensitive species but significant impacts can also arise from walkers, cyclists and horses, resulting in reduction in vegetation cover.

4.3.4 Studies in a variety of vegetation types have shown that low-growing, mat-forming grasses appear most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. Cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks of trampling pressure, but had recovered well after one year and as such these were considered to have resilience in respect of trampling pressure. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling.

4.3.5 In practice this can mean changes to the vegetation community compromising the viability of taller growing fragile plant species in favour of species which have a leaf rosette which lies flat to the ground and often leading to a loss of rarer, more vulnerable plant species in favour of more robust, common species.

4.3.6 Dune habitat and other coastal ecosystems, heathlands and wetlands are amongst the most sensitive to trampling and erosion, whereas woodlands and meadowlands are more robust.

Eutrophication

4.3.7 Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and the total volume of dog faeces deposited on sites can be surprisingly large. For example, at

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Burnham Beeches National Nature Reserve over one year, Barnard[35] estimated the total amounts of urine and faeces from dogs as 30,000 litres and 60 tonnes respectively. Nutrient-poor habitats such as heathland, chalk grassland and certain types of fen vegetation are particularly sensitive to the fertilising effect of inputs of phosphates, nitrogen and potassium from dog faeces. Most impacts occur close to paths.

Disturbance

4.3.8 The deleterious effect of disturbance on birds stems from the fact that the birds are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding. This can adversely affect the 'condition' and ultimately survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds. Disturbance of ground-nesting birds may result in the bird leaving the nest and exposing the eggs or chicks to predators or bad weather. Disturbed areas become unavailable for nesting even though the habitat may otherwise be suitable.

4.3.9 Walkers with dogs have potential to cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths and move more erratically and this has been shown by number of studies, with birds flushing more readily, more frequently, at greater distances and for longer periods of time when dogs are present, particularly off-lead.

4.3.10 Where increased recreational use is predicted to cause adverse impacts on a site, avoidance and mitigation should be considered. Avoidance of recreational impacts at European sites involves location of new development away from such sites or provision of an alternative recreational resource.

Site management

4.3.11 Public access can cause conflict between people and habitats in terms of compromising effective site management. Dogs, rather than people, tend to be the cause of many management difficulties, notably by worrying grazing animals or necessitating moving cattle away from footpaths.

4.4 European sites unlikely to be affected by recreational impacts

4.4.1 It is not likely that there would be a significant effect from recreational impacts on seven European sites. These sites are tabulated below, and the reasons why recreational impact is considered unlikely are given in the second column.

European site	Reason for no recreational impact
Paston Great Barn SAC	Small site with no public access
Overstrand Cliffs SAC	More-or-less vertical cliff which, although open to the public, in practice is rarely walked upon
Dews Pond SAC	Small site with no public access
Southern North Sea cSAC	Offshore site with no pedestrian access and low levels of dispersed recreational boating activity
Outer Thames Estuary SPA / pSAC extension	Offshore site with no pedestrian access and low levels of dispersed boating activity
Haisborough, Hammond and Winterton SAC	Offshore site with no pedestrian access and low levels of dispersed boating activity
River Wensum SAC	Aquatic interest is not affected by bankside recreation and public access to the river is in any case very limited. Boating is very limited in the SAC but encouraged downstream beyond the SAC in Norwich

[35] Barnard, A. (2003) Getting the Facts - Dog Walking and Visitor Number Surveys at Burnham Beeches and their Implications for the Management Process. *Countryside Recreation*, 11, 16 - 19

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4.5 European sites potentially affected by recreational impacts

4.5.1 European sites potentially affected by recreational impacts are tabulated below. Distances from development at which recreational impacts might occur are summarised from Panter and Liley's 2016 visitor study in Norfolk[36]. Most visits are for dog walking or walking with no dog.

European site	Potential recreational impact
Norfolk Valley Fens SAC	These are a group of small scattered fens, some with limited value for walking / dog walking except for very local users, and varied access arrangements and parking facilities. Those fens with public access but no car park are likely to be visited by those within 1km only. Buxton Heath, Holt Lowes and Marsham Heath all have car parks, and some other sites might have informal roadside parking even if no car park exists. The median distance travelled by car to these sites is 3 – 6km although few people resident in the area travel further than 2km.
The Broads SAC / Broadland SPA/Ramsar	Many of the habitats present in the designated sites of the broads are wet or very wet and unlikely to be favoured for recreation, with public usage almost entirely restricted to well managed nature reserves which feature boat-trails, footpaths and boardwalks. Most car parks serving the Broads / Broadland are located in villages, where walking is not the prime attraction, or associated with nature reserves where visitors are well managed. Recreational impact might occur where there is a large car park providing access to habitat used by SPA birds where a nature conservation organisation is not managing the land as a nature reserve, but these locations are rare. Such localised examples might, for example include minor disturbance to bird species on Halvergate by people walking out from public car parks in Yarmouth (anecdotal evidence), but such usage is restricted for the most part to long-distance walkers along the footpath and there is no access to habitats at marsh level. Although few people may walk along the riverside adjacent to Halvergate Marshes, each walker could create significant disturbance (Andrea Kelly, meeting on 3rd April 2018). Other recreational impact would occur where development is within walking distance of a Broadland site, such as in adjacent or close-by villages, with, again, access being restricted to floodbank footpaths. Where people drive from home to a car park on the Broads, the median distance travelled is up to 28km although few people resident in the area travel further than 5km. The number of boats on the Broads is controlled by the Broads Authority, a Competent Authority under the Habitats Regulations. Boat numbers are out of the control of the Greater Norwich Development Partnership. Currently the Broads Authority does not limit the number of boat licences it issues, and the number of licences is declining.
Breydon Water SPA / Ramsar	Although a 'coastal' site, this is not an attractive site for family recreational purposes as access requires either a boat trip or a walk from Great Yarmouth Railway Station or from public parking within the town in order to gain access it. There are very limited circular walk opportunities, the only option including crossing and then walking alongside the busy A47 for a short distance. There

[36] Panter, C., & Liley, D. (2016). Visitor Surveys at European Protected Sites across Norfolk during 2015 and 2016. Footprint Ecology

European site	Potential recreational impact
	are few visitors, who almost all come by car, and the median distance travelled is 12km although few people resident in the area travel further than 5km.
Great Yarmouth North Denes SPA	This site has an attractive beach in association with other coastal amenities. Car parks, including free beach-front parking, are readily available but appear to be used by holiday-makers because the median distance travelled by those who come from home is just 1km.
Winterton – Horsey Dunes SAC	The site has an attractive beach and circular walk options including a long-distance trail taking in the fragile dune system, with other major attractions including the seal colony. Car parks are readily available. Visitors do not keep to paths and can walk anywhere on or behind the dunes. The median distance to various parts of this site is up to 44km at Horsey Gap although visitor numbers are very low above a distance of 5km from home.
Waveney and Little Ouse Valley Fens SAC	The Redgrave and South Lopham Fen component of the SAC is attractive to many visitors, and visitors are actively encouraged by the landowner and site manager, Suffolk Wildlife Trust. A modest increase in visitors would be acceptable as paths through the site are routed so as to avoid vulnerable habitats. Sensitive vegetation away from the path network is in any case avoided by visitors as usually wet or uncomfortable to walk on. Other component fens are small, and scattered fens, with limited value for walking / dog walking except for very local users, and varied access arrangements and parking facilities. Where parking exists, there is usually a managed access scheme in place. Those fens with public access are likely to be regularly visited by those living within 2km, similar to the Norfolk Valley Fens. There is no visitor data.
Redgrave and South Lopham Fen Ramsar	The Redgrave and South Lopham Fen component of the SAC is attractive to many visitors, and visitors are actively encouraged by the landowner and site manager, Suffolk Wildlife Trust. A modest increase in visitors would be acceptable as paths through the site are routed so as to avoid vulnerable habitats. Sensitive vegetation away from the path network is in any case avoided by visitors as usually wet and uncomfortable to walk on. As above, the fen with public access is likely to be regularly visited by those within 2km only, similar to the Norfolk Valley Fens. There is no visitor data.
Breckland SPA / SAC	Research has shown that even at honeypot sites, nesting of woodlark and nightjar continues. Modest increases in recreation are unlikely to affect these species. Nesting sites for stone-curlew are either closed for public access (heathland sites) in the nesting season, or are on farmland with no public access so disturbance would not occur. No likely recreational effect except in circumstances where a large increase in visitors to a little-disturbed part of the SPA would occur such as a large allocation adjacent to Breckland. Trampling of SAC vegetation is generally low, with visitors from distance often visiting a few honeypot visitor centres outside the SAC e.g. High Lodge visitor centre, West Stow Heath Country Park. Median distances travelled by people coming from home vary from 23 – 47km but visitor rates are low above 10km distant.

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European site	Potential recreational impact
Benacre to Easton Bavents SAC / SPA	Despite being remote from towns and villages, and with limited parking, this site is (in the experience of the report authors) already very popular with, and vulnerable to disturbance effects from visitors travelling from Norwich and Broadland towns and villages. The visitors then use several local circular walking routes, including a long-distance trail, which take in sections of coastal reedbed, heathland and dune systems. Some increase in recreational effect could occur as a consequence of major development in the southern Broads area or from site allocations in close proximity. There is no data on distance travelled but it could be reasonably similar to other eastern coastal sites with a 10km threshold distance.
The Wash and North Norfolk Coast SAC	The site is an attractive and accessible coast designated for marine and intertidal habitats / species. Car parks are readily available. The median distance travelled from home varies from 2km to 30km for most parts of this site, with Morston (S) having a median distance of 41km; but visitor rates are lower for residents living over 14km distant.
North Norfolk Coast SPA / SAC / Ramsar	The site is a very attractive and accessible coast with a range of habitats and landscapes, and including a variety of circular walk options and a long-distance path. Car parks are readily available. Car parks are readily available. The median distance travelled from home varies from 2km to 29km for most parts of this site, with Morston (S) having a median distance of 41km but visitor rates are very low for residents beyond 14km.

4.5.2 The Green Infrastructure and Recreational Impact Avoidance Strategy (GIRAMS) uses this data to set impact risk zones for each European site.

4.5.3 Using the Local Plan documents available at the time, Panter and Liley (2016) estimated the increase in visitor numbers from the housing allocated at that time. The Local Plan documents used were

- Broadland District Council Site Allocations DPD (Adopted 2016)
- Broadland District Council Growth Triangle Area Action Plan (Adoption Imminent at that time)
- Norwich City Site Allocations Plan (Adopted 2014)
- South Norfolk Council Site Allocations and Policies Document (Adopted 2015)
- South Norfolk Council Wymondham Area Action Plan (Adopted 2015)
- Breckland Site Specific policies and Proposals (Adopted 2012)
- North Norfolk Site Allocations (Adopted 2011)
- Great Yarmouth Borough Council, Awaiting Development Policies and Site Allocations DPD, Previous allocations used (2001)
- Borough Council of King's Lynn and West Norfolk Preferred Options for Detailed Policies and Sites 2013, not yet adopted at that time

4.5.4 Key findings relating to housing change, links to allocated new housing at that time and implications included:

- A 14% increase in access by Norfolk residents to the sites surveyed (in the absence of any mitigation), as a result of new housing during the current plan period.

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- The increase will be most marked in the Brecks, where an increase of around 30% was predicted. For the Broads the figure is 14%; 11% for the East Coast; 9% for North Norfolk; 15% for Roydon & Dersingham; 28% for the Valley Fens and 6% for the Wash (note these figures relate to the surveyed access points only and to visits by Norfolk residents).

4.5.5 With a median dog walk length of around 3km, it is considered that a housing allocation within 1km of a European site access point (i.e. a site freely available for public entry / use) is likely to result in an increased visitor use of that European site, especially for regular dog walking, by people walking to the European site. Housing allocations greater than 1km distant are less likely to generate increased visitor use from people walking to that site, and above 1.5km distance there is likely to be little or no increased visitor use by people walking to the entry point. European sites with car parking provision would be likely to experience impacts resulting from development within a larger radius as described in the table above.

4.5.6 For parts of the North Coast, the Broads, and parts of the East Coast, the links between an increase in local housing and recreation impacts are less clear as these sites attract a high number of visitors coming from a wide geographical area, both inside and outside Norfolk. There are therefore likely to be pressures from overall population growth both from within the county and further afield.

4.5.7 Visitor access to European sites by the Greater Norwich Local Plan allocations compared to the 2016 study would be an increase in visitors because of the additional allocations in the GNLP and also bearing in mind completed housing development since the study. The distribution of the allocations in Greater Norwich are such that the European sites likely to have the larger increases in visitor numbers would be The Broads / Broadland, Winterton – Horsey Dunes, Norfolk Valley Fens (Marsham Heath), and North Norfolk Coast SPA / SACs / Ramsar.

4.6 Increased pressure on water resources

4.6.1 The new homes would require a reliable source of drinking water. Proposed employment facilities would need a source of water for the domestic needs of the employees, and might also need water for manufacturing or other industrial processes such as washing.

4.6.2 The east and southeast of England have been identified by Environment Agency in 2013 as a region which is currently experiencing considerable pressure on water resources with the deficit situation within both the Essex and Suffolk Water and the Anglian Water areas being considered to be 'serious' at the present time due to limited water resources and high levels of demand. This situation is unchanged across 4 different future growth and climatic scenarios[37] and the study concluded that both the Anglian Water area and Essex and Suffolk Water areas are currently experiencing 'Serious Stress', this being the highest level.

4.6.3 The Environment Agency has advised the Secretary of State that the areas classified as under 'Serious Stress' should be designated as 'Areas of serious water stress' for the purposes of Regulation 4 of the Water Industry (Prescribed Condition) Regulation 1999 (as amended).

4.6.4 Anglian Water (AW), in its 2019 Water Resources Management Plan has identified the relevant Resource Zones (RZ) to this Greater Norwich Local Plan area as being Norwich and the Broads, Norfolk Rural, and the North Norfolk Coast. The AW assessment takes into account planned and predicted growth and climate change. All Resource Zones are forecast to be in deficit (i.e. not enough water being available) to 2045 prior to measures in the plan intended to prevent the deficit being implemented.

4.6.5 Pressure on water resources resulting in reduction in water levels or flow in groundwater-fed wetlands, and in streams, rivers and waterbodies would be a likely consequence of increased water demand requiring greater water abstraction from groundwater or surface water. Surface water abstraction could have a direct impact upon water levels and stream flow; groundwater abstraction would potentially lead to reduced flows in any watercourses which derive a significant proportion of their water from spring flow and also reduced surface and sub-surface flow through

[37] Environment Agency and Natural Resources Wales. 2013. Water Stressed Areas Final Classification https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressedclassification-2013.pdf

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fen and mire habitats. Wetland European sites which are dependent upon a groundwater source may become too dry to support special interest features.

4.6.6 Water resources in the region are already under considerable pressure. For example, Environment Agency's Review of Consents work in 2009 resulted in the closure of a Public Water supply borehole in the vicinity of Sheringham and Beeston Regis Commons SSSI (part of the Norfolk Valley Fens SAC). A Public Water Supply borehole at Ludham in the vicinity of Catfield Fen (part of the Broads SAC) was closed in March 2021 to prevent further negative impact upon the flora and fauna of this groundwater-fed site[38].

4.6.7 Abstraction at a future major water supply borehole, could potentially give rise to an impact upon designated groundwater dependant wetland sites more than 10km away, depending upon the depth of the borehole, the nature of the strata from which abstraction is taking place and its relationship with local wetland sites. It is assumed that any future borehole might be as much as 10km from any proposed development location.

4.6.8 Depleted riverine flows may also result in an increased number, and severity of, saline incursion events and will also increase the concentration of pollutants and nutrients possibly to above set targets. Ground water abstraction from near-surface aquifers can also lead to saline incursion into the aquifer resulting in damage to coastal wetland sites, which receive a proportion of their irrigating water from groundwater.

4.6.9 A new body, Water Resources East (WRE) has been set up to address water demand deficit. It brings together partners from a wide range of industries including: water, energy, retail, the environment, land management and agriculture, to work in collaboration to manage these challenges, building on the area's unique opportunities for sustainable future growth, and pioneering a new approach to managing water resources.

4.6.10 Anglian Water's 2019 Water Resource Management Plan outlines how Anglian Water will maintain a sustainable balance between water supplies and demand over the next 25 years. It describes how it proposes to maintain that balance by investing in demand management – metering and water efficiency for example – and developing new water resources. Anglian Water's 2019 Water Resources Management Plan indicates that it will manage water resources by 'managing demand' from existing and proposed customers (ie supplying less water per customer) and by transferring water from other areas, with no increase in abstraction and no new abstractions. No new boreholes or increase in abstraction from existing boreholes are explicitly proposed and so there would be no impact on the water resources available to European sites.

4.7 Pollution impacts: Waste water discharge

4.7.1 Reduction of water quality, from increased discharges of sewage and surface water drainage, or from pollution incidents, either during, or after, construction has potential to impact upon riparian and wetland European sites downstream of a settlement. The types of habitat which might be sensitive to that change would depend very much upon the nature and scale of the impact.

4.7.2 It is assumed that waste water discharge from developments, including foul water discharges, would be treated, however may give rise to elevated levels of nitrates, and, depending upon whether phosphate stripping equipment is in place, phosphate, downstream of the discharge point. There is also potential for chemical spillages, or STW failure, to lead to discharge of untreated effluent.

4.7.3 Anglian Water is currently in the process of finalising a Long Term Water Recycling Plan which will set out a long term strategy to identify the need for further investment by Anglian Water at existing water recycling centres or within foul sewerage catchments to accommodate the anticipated scale and timing of growth. Anglian Water has a statutory duty to prevent pollution from sewage, so whilst there is a theoretical risk from water recycling centres there is also a mechanism in place to prevent the risk. Permits issued by Environment Agency are set for each water recycling centre and are specific to ensure sufficient water quality at the discharge point.

[38] https://www.anglianwater.co.uk/news/anglian-water-completes-scheme-to-protect-unique-norfolk-environment/

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4.7.4 The impacts of water pollution would depend entirely on the nature of the effluent or chemicals being released and whether the release is slow or sudden, but may potentially result in consequences such as fish kill, extinction of invertebrate taxa, which are more sensitive to pollution or changes in Biological Oxygen Demand (BOD), loss of taxa of water plants which require low nutrient levels or eutrophication of floodplain fen habitats. These impacts could potentially affect Annex II European designated species such as white clawed crayfish, Desmoulins whorl snail, brook lamprey or bullhead, directly or indirectly and may also result in the loss of Annex I habitats such as *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation.

4.8 Pollution impacts: Additional traffic movements increasing emissions to air

4.8.1 The main airborne pollutants of concern in the context of their potential to give rise to adverse impacts upon European sites are oxides of nitrogen (NOx), ammonia (NH_3) and sulphur dioxide (SO_2).

4.8.2 The primary pollutants SO_2, NO and NO_2 are oxidised in the atmosphere to form SO_4^{2-} and NO_3^- respectively, while NH_3 reacts with these oxidised components to form NH_4^+ (ammonium). These pollutants know as aerosols can travel long distances, and together with primary pollutants can be deposited in the form of wet or dry deposition[39].

4.8.3 The Air Pollution Information System (APIS) provides a useful summary of the main pollutants, the effects they have on vegetation and other features for which European sites might be designated. Concentrations and deposition of air pollutants are assessed against a range on criteria to protect both human health and the environment. Environmental criteria include critical loads[40] for nitrogen deposition (kg Nitrogen ha^{-1} $year^{-1}$) and acid deposition and critical levels for ammonia (µg m^{-3}), sulphur dioxide (µg m^{-3}), nitrogen dioxide (µg m^{-3}), and ozone (ppb hours). There are some critical loads for heavy metals but these are not currently used to assess impacts. There are no critical levels or loads for other pollutants but in some cases there are other assessment criteria such as environmental quality standards (EQS) and environmental assessment levels (EAL) which are not relevant to the present study.

4.8.4 NOx can have a directly toxic effect upon vegetation, but in addition to this, higher concentrations of NOx or ammonia within the atmosphere will lead to greater rates of nitrogen deposition to soils, leading to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats. Most SAC sites are designated for the vegetation they support, and this is generally vegetation which would respond adversely to nutrient input, including increased input of Total Nitrogen. Both SO2 and NOx can lead to acid deposition and acidification of vegetation.

4.8.5 Housing development would be likely to give rise to increased levels of NOx arising from increased vehicle movements. Ammonia release is generally associated with increased numbers of agricultural livestock and certain industrial processes, including the production of energy from waste, and is unlikely to arise as a direct consequence of the Great Norwich Growth Plan.

4.8.6 The table below summarises the main airborne pollutants and discusses the mechanisms by which these might potentially impact upon European sites.

Pollutant	Source	Potential effects on European sites	Significance
Sulphur Dioxide SO_2	SO_2 emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil,	Both wet and dry deposition of SO_2 acidifies soils and freshwater, and consequently alters the species composition of vegetation and hence associated animal communities. Some habitats will be more at risk than	It is not anticipated that the development of the Growth Area would necessitate construction of new power-producing facilities and the demographic of local industry is unlikely to shift towards the types of

[39] http://www.apis.ac.uk/starters-guide-air-pollution-and-pollution-sources
[40] http://www.apis.ac.uk/overview/issues/overview_Cloadslevels.htm

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Pollutant	Source	Potential effects on European sites	Significance
	and to a lesser extent, motor vehicles.	others depending on soil type and buffering capacity. The significance of impacts depends on levels of deposition and the sensitivity of the habitat.	processes which would result in high levels of combustion. Total SO_2 emissions have decreased substantially in the UK since the 1980s and SO2 deposition is not considered to have potential to give rise to significant effects on vegetation and is not considered to be a significant factor in the context of this study
Ammonia (NH_3)	Ammonia is released following decomposition of animal wastes. Levels will increase with expansion in numbers of livestock and certain specific industrial processes, including the production of energy from waste	Ammonia can give rise to an adverse effect on vegetation through deposition and the consequent eutrophication of vegetation, leading to changes in the species composition of vegetation and hence associated animal communities. Some habitats will be more at risk than others depending on the ability of the vegetation type to 'absorb' nutrients without adverse change taking place.	The nature of the industries associated with employment allocations in the Greater Norwich Growth Area are as yet uncertain, do not provide a clear source of ammonia emissions. Significant release of NH3 is unlikely to arise as a direct consequence of the Great Norwich Growth Plan and is not considered to be a significant factor in the context of this study.
Nitrogen oxides (NOx)	Nitrogen oxides (nitrates (NO_3), nitrogen dioxide (NO_2) and nitric acid (HNO_3)) are produced through combustion processes. About one quarter of the UK's emissions are from power stations, one-half from motor vehicles, and the rest from other industrial and domestic combustion processes.	Deposition of nitrogen oxides can lead to both soil and freshwater acidification. Some habitats will be more at risk than others depending on soil type and buffering capacity. Mosses, liverworts and lichens, which received their nutrients directly from the atmosphere are particularly vulnerable to elevated NOx levels and grey dune and heathland ecosystems are perhaps the most sensitive. In addition, NOx can cause eutrophication of soils and water. This alters the species composition of plant communities and hence associated animal communities. Some habitats will be more at risk than others depending on ability of the vegetation type to 'absorb' nutrients without adverse change taking place.	It is not anticipated that the development of the Growth Area would necessitate construction of new power-producing facilities, but domestic and commercial heating and vehicle emissions could potentially be substantial given the number of proposed homes. The significance of impacts will depend on the background level, levels of deposition and the sensitivity of the habitat. NOx contributes to total N deposition – see below. Traffic-generated air pollution operates close to roads but falls off to almost nothing at a distance of 200m from the road[41].

[41] http://www.standardsforhighways.co.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf

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Pollutant	Source	Potential effects on European sites	Significance
Total Nitrogen (N)	The pollutants that contribute to nitrogen deposition derive mainly from NOX and NH3 emissions.	Species-rich plant communities with relatively high proportions of slow-growing perennial species, bryophytes and lichens are most at risk from N eutrophication, due to its promotion of competitive and invasive species which can respond readily to elevated levels of N at the expenses of slow-growing species. The eventual impacts include changes in species composition, reduction of plant diversity, loss of sensitive species and an increased rate of succession in wetland ecosystems.	The significance of impacts will depend on levels of deposition and the sensitivity of the habitat, however background levels of Total N deposition across east Norfolk and north Suffolk is typically already within the critical load range for many of the sensitive habitats in the area[42] and in some instances exceed the upper end of the range[43]. Total N is considered to be a potential significant factor in the context of this study for developments in close proximity to European sites with nutrient sensitive vegetation. Across the UK there has been a continued decline in Nitrogen Oxides since 1974, with emissions in 2017 being around half those in 2000[44].
Ozone (O_3)	A secondary pollutant generated by photochemical reactions from NOx and volatile organic compounds (VOCs). These are mainly released by the combustion of fossil fuels. Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	Concentrations of O3 above 40 ppb can be toxic to wildlife. Increased ozone concentrations may lead to a reduction in growth and altered species composition in seminatural plant communities.	Background levels in the region are typically below 30ppb[45]. Significant combustion of oil and coal is unlikely to arise as a direct consequence of the Great Norwich Growth Plan and O_3 is not considered to be a significant factor in the context of this study.

4.8.7 The distance over which additional traffic movements might give rise to emissions to air such as Nitrogen oxides NO_x which have the potential to result in adverse impact upon vegetation or water quality is closest to the road network and that, for NOx, levels have fallen to the background level within 200m of the road.

4.8.8 A Natural England literature search study[46] into the effects of specific road transport pollutants, found that, combining evidence from two fumigation experiments and a transect study suggests that NOx is the key phytotoxic component of exhaust emissions. While no new papers relating to

[42] http://www.pollutantdeposition.ceh.ac.uk/content/nitrogen-compounds

[43] http://www.apis.ac.uk/search-location

[44] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/778483/Emissions_of_air_pollutants_1990_2017.pdf

[45] https://uk-air.defra.gov.uk/assets/documents/reports/aqeg/aqeg-ozone-report.pdf

[46] https://publications.naturalengland.org.uk/file/5064684469223424

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roadside buffer zones were identified from recent literature, one group of researchers noted that based on their data and the literature, new road building and road expansion should avoid a buffer zone of up to 100–200m from sensitive sites, particularly those where bryophytes are an important component of habitats.

4.8.9 It is therefore surmised that the area affected by traffic emissions to air can be assumed to closely follow existing road corridors within the Growth Area and it is also assumed that any future road construction would be largely within the Growth Area.

4.8.10 The vegetation communities occurring within the study area and potentially at risk from atmospheric nitrogen deposition are as follows. It can be seen that dune systems are particularly vulnerable.

Habitat type (EUNIS code)	**Critical load (CL) range (kgN/ha/yr)**
Marine habitats	
Mid-upper saltmarshes (A2.53)	20-30
Pioneer & low-mid saltmarshes (A2.54 and A2.55)	20-30
Coastal habitats	
Shifting coastal dunes (B1.3)	10-20
Coastal stable dune grasslands (grey dunes) (B1.4)	8-15
Coastal dune heaths (B1.5)	10-20
Moist to wet dune slacks (B1.8)	10-20
Inland surface waters	
Dune slack pools (permanent oligotrophic waters) (C1.16)	10-20
Permanent dystrophic lakes, ponds and pools (C1.4)	3-10
Mire, bog and fen habitats	
Valley mires, poor fens and transition mires (D2)	10-15
Rich fens (D4.1)	15-30
Grasslands and tall forb habitats	
Non-Mediterranean dry acid and neutral closed grassland (E1.7)	10-15
Low and medium altitude hay meadows (E2.2) (includes floodplain grazing marsh)	20-30
Molinia caerulea meadows (E3.51)	15-25
Heathland, scrub & tundra	
Erica tetralix dominated wet heath (lowland)	10-20
Dry heaths (F4.2)	10-20

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Habitat type (EUNIS code)	Critical load (CL) range (kgN/ha/yr)
Forest habitats (general):	
Broadleaved woodland (G1)	10-20

4.8.11 Nitrogen oxide pollution could affect European sites within 200m of new roads, existing roads where daily traffic flows will change by 1,000 AADT or more; or Heavy Duty Vehicle (HDV) flows will change by 200 AADT or more; or daily average speed will change by 10 km/hr or more; or peak hour speed will change by 20 km/hr or more.

4.9 Increased urbanisation of the countryside

4.9.1 This class of impacts is closely related to recreational pressure in the sense that both types of impact arise from having an increased human population close to protected wildlife sites. The list of such impacts is extensive, but some of the more significant ones include the following:

Predation impacts from domestic pets

4.9.2 Predation by domestic cats can potentially affect small mammals, birds, amphibians and reptiles and results in injury, mortality and elevated levels of disturbance.

4.9.3 A survey undertaken in 1997 found that nine million British cats brought home 92 million prey items over a five-month period[47].

4.9.4 A large proportion of domestic cats are found in urban situations, and thus increasing urbanisation is likely to lead to increased cat predation. Domestic cats will potentially range up to 5km from home, although 60% of forays are over a distance of less than 400m[48] and the typical average distance for hunting excursions is around 375m[49] according to 20th century studies.

4.9.5 There have been two studies of cat ranging behaviour published in more recent years. These used GPS collars on cats in Berkshire/Hampshire villages[50] and in Reading[51]. Both studies found that cats within the village and in urban / suburban areas of Reading has smaller home ranges than expected, with most cats in the villages travelling a mean distance of 64.9m into natural habitats around the village, with some cats ranging over 300m into these areas. Cats living in properties adjacent to woodland or heathland caught no more birds than those with little access to natural habitats.

4.9.6 The Reading study found that cats in dense urban areas travelled up to 79m, in suburban areas up to 141m and in town edge areas up to 148m. The suppression of cat travelling distances in areas of higher housing density suggests that as urban development progresses into the countryside, the cats on the former development edge would reduce their range in response to expansion of development into the area of countryside they formerly visited.

4.9.7 The predation impact of cats is therefore not cumulative as the introduction of 'new' cats because new development generally results in a reduction of 'existing' cats' range. The recent research suggests that even a 400m buffer zone from European in relation to cat predation may be over-

[47] Woods, M. et al. 2003. Predation of wildlife by domestic cats Felis catus in Great Britain. *Mammal Review* 33, 2 174- 188

[48] Barratt, D.G. (1997). Home range size, habitat utilisation and movement patterns of suburban and farm cats Felis catus. *Ecography* 20 271-280

[49] Turner, D.C. & Meister, O. (1988). Hunting behaviour of the domestic cat. In: *The Domestic Cat: The Biology of Its Behaviour.* Ed. Turner, D.C. and Bateson, P. Cambridge University Press.

[50] Tara J Pirie, Rebecca L Thomas and Mark Fellowes (2022) Pet cats *Felis catus* from urban boundaries use different habitats, have larger home ranges and kill more prey than vats from the suburbs. Landscape and Urban Planning, 220, 1-10

[51] Hugh J. Hanmer, Rebecca L. Thomas and Mark Fellowes (2017) Urbanisation influences range size of the domestic cat (Felis catus): consequences for conservation. Journal of Urban Ecology, 2017, 1-11

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precautionary and the 1km separation from allocations is adequate to prevent cat predation on qualifying features of European sites.

Fly-tipping

4.9.8 Fly-tipping tends to take place only a short distance from development and affects land alongside or close to highways[52]; often the terminus of a minor dead-end road, or adjacent to laybys on busier routes. The distance travelled will vary, but is likely to be usually less than 10km from source. Material dumped in this way is typically either household waste, including 'white goods' and green waste, tyres, or small-scale commercial waste. Depending upon the locality and nature of tipping, there may be harm to watercourses through pollution, damage to sensitive vegetation and in the case of green waste tipping in a woodland or wetland near to home, the release of alien invasive plant species into the wild; the species being dumped often being the more vigorous and hence potentially more invasive garden plants.

4.9.9 A 2016 report by Yorkshire Wildlife Trust[53] found that the greatest amount of fly-tipping and anti-social behaviour on its nature reserves, and theft from their nature reserves, were greatest when there were settlements within 100m. Where there were nature reserves 1km+ distant from the nearest settlement, these activities were still recorded but much less often.

Lighting

4.9.10 Light pollution can affect the foraging and commuting activities of bat species, although there may be minor impacts upon bird behaviour.

- The slower flying broad winged species, which include Barbastelle (a European site designated feature of Paston Great Barn SAC) generally avoid street lights[54] and well-lit areas.
- It is thought that insects are attracted to lit areas from further afield and this may result in adjacent habitats supporting reduced numbers of insects. This is a further impact on the ability of the light avoiding bats to be able to feed.
- Artificial lighting is thought to increase the chances of bats being preyed upon[55]. Many avian predators will hunt bats which may be one reason why bats avoid flying in the day. Observations have been made of kestrels (diurnal raptors) hunting at night under the artificial light along motorways. Lighting can be particularly harmful if used along commuting corridors such as river corridors, tree lines and hedgerows used by bats.

4.9.11 These urbanisation impacts are most likely to occur when a European site is within 1km of a settlement and therefore an allocation within 1km of a European site might increase urbanisation effects.

4.10 Avoidance and mitigation for potential impacts of the proposed Gypsy and traveller sites

Locational mitigation

4.10.1 Proposed Gypsy and Traveller sites allocations are all over 1km from any European site. This avoids for any potential land-take impacts during construction, cat predation, air pollution (no polluting factories are allocated but in any case if they arise would be subject to project-level HRA), urbanisation of the countryside, and recreational impacts of people walking to a European site to start a greenspace walk.

4.10.2 With a median dog walk length of around 3km, it is considered that a Gypsy and Traveller allocation within 1km of a European site access point (i.e freely available for public entry / use) is likely to result in an increased visitor use of that European site, especially for regular dog walking, by people walking to the European site. Allocations greater than 1km distant are less

[52]https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/595773/Flytipping_201516_statistical_release.pdf

[53] Rylatt, Garside and Robin (2017) Human Impacts on Nature Reserves – The Influence of Nearby Settlements. Yorkshire Wildlife Trust.

[54] http://www.bats.org.uk/data/files/bats_and_lighting_in_the_uk__final_version_version_3_may_09.pdf

[55] http://www.bats.org.uk/data/files/bats_and_lighting_in_the_uk__final_version_version_3_may_09.pdf

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likely to generate increased visitor use from people walking to that site, and above 1.5km distance there is likely to be little or no increased visitor use by people walking to the entry point. The size of an allocation is also related to potential impact, with an allocation of, say, 100 dwellings likely to generate more visitor use of a European site than an allocation of 10 dwellings at the same distance.

4.10.3 The proposed Gypsy and Traveller sites are all over 1.5km from the nearest European sites, and most are significantly further. This avoids the likelihood of direct recreational impact arising from walks from the pitches to a European site.

Recreational impacts. Provision of green infrastructure

4.10.4 Natural England has advised all Local Planning Authorities in Norfolk (letter of 2019 within the GIRAMS report) that large developments (defined as fifty houses or more) include green space which is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the developed site. This advice applies across the whole of Norfolk because Natural England considers that development of this scale anywhere in the county could have a likely significant effect on a European site.

4.10.5 No evidence has been provided to support the threshold of 50 or more dwellings, and it is considered that each and every new home may have an identical impact. Greater Norwich Local Plan requires all residential development to provide green infrastructure, in Policy 3. The requirement is not restricted to 50 or more dwellings as advised by Natural England. If a development site is too small to provide green infrastructure on site, a contribution secured by S106 to green infrastructure elsewhere will be required.

4.10.6 Policy 3 applies to Gypsy and Traveller pitches in the same way as it does to standard dwellings.

Recreational impacts. In-combination effects of all housing developments

4.10.7 The Green Infrastructure and Recreational Impact Avoidance Strategy (GIRAMS) proposes a tariff based payment taken from residential, and other relevant accommodation e.g. tourist accommodation, that will be used to fund package of avoidance and mitigation measures to be delivered at Habitat Sites. This consists of a team of Rangers to influence visitor behaviour, signage, monitoring, a dog project, providing strategic mitigation projects, and various other tasks. A tariff payment of £185.93 per household is in place across Norfolk to provide enough money to pay for the mitigation works. The GIRAMS has been finalised for adoption by the local planning authorities and contributions are currently being collected by Norwich City Council[56], Broadland District Council[57] and South Norfolk Council[58]. This applies to Gypsy and Traveller pitches in the same way as it does to standard dwellings

4.10.8 It is considered that the GIRAMS measures described above would be sufficient that the assessment is able to ascertain no adverse effect upon the integrity of any European site, subject to the adoption of the GIRAMS and its implementation by the local planning authorities.

Provision of new Country Park

4.10.9 Broadland Country Park was created by Broadland District Council between Felthorpe and Horstead and opened in March 2021[59]. This location is close to the Norwich Growth Triangle, and the site is being designed and managed to attract a larger number of recreational visitors. The Country Park will reduce visitor pressure on European sites by providing an attractive alternative.

Air pollution

4.10.10 No new roads are proposed in the Plan within 200m of any European site, and the siting of proposed allocations further than 1km from any European site indicates that road traffic

[56] https://www.norwich.gov.uk/info/20017/planning_applications/1181/supporting_plans_and_documentation accessed on 7th May 2022
[57] https://www.southnorfolkandbroadland.gov.uk/planning-applications/apply/3 accessed on 7 May 2022
[58] https://www.southnorfolkandbroadland.gov.uk/planning-applications/apply/4 accessed on 7 May 2022
[59] https://www.southnorfolkandbroadland.gov.uk/broadlandcountrypark accessed on 7th May 2022

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associated with the developments would be sufficiently distant from European sites that there would be no pollution impacts.

Water resource use

4.10.11 A water cycle study by AECOM (March 2021) as evidence for the Greater Norwich Local Plan looked in detail into how new development can be supplied with water.

4.10.12 Anglian Water Services plans for the long term provision of water supplies through a five yearly planning cycle, through the production of statutory Water Resource Management Plans (WMRP). The WRMP sets out how changes in demand for water and changes in available water in the environment will be managed, including measures to manage how much water customers use (demand management) and measures to provide new sources of supply to current and future customers. The Anglian Water WRMP (2019) indicates that through the introduction of strategic demand management options and supply side schemes within the supply areas serving Greater Norwich Authorities, adequate water supplies will be available up to 2045 and will cater for the proposed levels of growth. No new abstraction from the environment is proposed

4.10.13 The Water Cycle Study confirms that Anglian Water's measures to improve efficiency of existing homes and businesses, reducing leakage by mending leaky watermains, and new homes being designed to be water-efficient, will mean that no new abstractions are required. Local Plan Policy 2 'Sustainable Communities' includes a requirement for housing development to meet the 'Building Regulations part G (amended 2016) water efficiency higher optional standard' which requires a calculated use of 110l per day.

4.10.14 Consequently it is clear that there would be no impact on European sites from water abstraction as there would be no additional abstraction to meet water needs.

Waste water discharge – 2021 GNLP HRA information, now superseded

4.10.15 The Water Cycle Study which forms part of the evidence base for the Local Plan (AECOM March 2021 Greater Norwich Water Cycle Study) looked in detail at discharge issues, including any risk of European sites having an increased nutrient loading. The report's summary states that

> *The WCS has identified that there are several WRCs within the study area that do not have sufficient capacity to treat all additional wastewater flows from the proposed level of growth within their catchments (Acle, Aylsham, Barnham Broom, Beccles, Ditchingham, Freethorpe, Long Stratton, Whitlingham Trowse, and Wymondham). The study also identified that some WRCs have capacity but using that capacity may impact significantly on the water quality and ecology of watercourses receiving the treated discharge (Cantley, Saxlingham and Woodton). Finally, future discharge volumes from Reepham and Foulsham WRC were also assessed, irrespective of capacity, due to their discharge within the River Wensum Special Area of Conservation (SAC). Water quality and ecological assessments have been undertaken for these future discharges focusing on demonstrating what is required to ensure no increase in pollution load as a result of growth.*
>
> *The assessment has shown that subject to the revision of discharge permits and the implementation of the necessary treatment process upgrades (using conventional treatment technologies), changes in water quality as a result of additional discharge can be managed to ensure there is no overall increase in pollutant load, and no adverse change in water quality or connected water dependent ecologically protected sites as a result of growth.*
>
> *However, the analysis has demonstrated that treatment upgrades required to deliver this outcome will be significant for several of the WRCs and this will require substantial investment from AWS over the longer term. This may affect phasing of development (up to 2025) in some locations of the study area, and longer term to 2030 in some cases. Key locations where this has been considered in the development of policy include Long Stratton, Wymondham and Whitlingham. It will be a requirement in these locations for development to demonstrate that there is sufficient capacity at WRC before that development can proceed.*

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Through their Water Recycling Long-term Plan, AWS have already identified a potential need for planned investment to upgrade WRC capacity at Aylsham, Long Stratton and Woodton in the plan period as well as increased drainage capacity at Whitlingham and Wymondham.

4.10.16 The July 2021 Habitats Regulations Assessment of the Greater Norwich Local Plan said that it was necessary to make improvements to Water Recycling Centres at Foulsham WRC and Reepham WRC to avoid an increase in nutrient discharge into River Wensum SAC, together with revised discharge permits from Environment Agency. This is not immediately necessary but would be required by 2025.

4.10.17 It is necessary to make improvements to Water Recycling Centres at Aylsham WRC (which are already programmed) and at Whitlingham Trowse WRC to avoid an increase in nutrient discharge into Broadland SAC/Ramsar, together with revised discharge permits from Environment Agency for those WRCs. This is not immediately necessary but would be required by 2025. Beyond 2025, if the improvements are not made, a moratorium on growth would be needed until the measures are in place.

4.10.18 Policy 4 of the Greater Norwich Local Plan committed the Greater Norwich planning authorities to working with utilities providers, to improve waste-water management including at Whitlingham Trowse WRC. This gave confidence in 2021 that the need for the improvements will be progressed.

Waste water discharge – 2022 update for Nutrient Neutrality

4.10.19 On 16th Match 2022, Natural England wrote to partner Councils within Greater Norwich Development Partnership to advise that River Wensum SAC and The Broads SAC were being harmed by excess nitrate and phosphate in the water. The origin of these plant nutrients is from agricultural run-off, urban run-off (e.g. from fertilised gardens and dog fouling), treated water from Water Recycling Centres, and others. New residential development would need to demonstrate that it would not exacerbate the existing problem by adding further nitrate and phosphate from its sewage and run-off. Natural England's advice is provided in Appendix 3 for The Broads SAC / Ramsar and in Appendix 4 for River Wensum SAC. A calculator spreadsheet was also provided by Natural England to facilitate calculation of nutrient change from the current land use. Subsequently a different calculator developed by Royal Haskoning has been made available by Councils in Norfolk which Natural England advises is less precautionary that its calculator (Appendix 5). The Royal Haskoning work therefore supersedes the Natural England calculator.

4.10.20 This advice applies to Gypsy and Traveller pitches as well as to standard dwellings. The proposed pitch allocations are therefore in the same situation as housing allocations with respect to Nutrient Neutrality; all pitch allocations except that at Lingwood drain to Water Recycling Centres within the catchments of either the River Wensum SAC or The Broads SAC / Ramsar. Site-specific assessments and solutions may be proposed, and a strategic solution is being sought by partner Councils within Greater Norwich Development Partnership. At the time of writing, it is anticipated that modification to the strategic policies of the GNLP will be made by March 2023, to be available for an Examination hearing[60]. Policy amendments are expected to tie the delivery of housing growth more tightly to nutrient levels impacting on internationally protected habitats, including as appropriate, a county-wide mitigation strategy. The availability of a mitigation strategy will affect the timing of the delivery of housing sites and Gypsy and Traveller pitches as opposed to the principle of their development.

4.11 Assessment of proposed allocations for Gypsy and traveller sites

4.11.1 Subject to satisfactory policy modification with respect to Nutrient Neutrality, it is ascertained that the proposed allocations for Gypsy and Traveller sites will have no adverse effect upon the integrity of any European site. This conclusion is made for the proposed allocations individually and collectively, including the contingency allocation in Costessey.

[60] https://www.gnlp.org.uk/local-plan-examination-local-plan-examination-document-library-d-post-submission-examination/d5 accessed on 7th May 2022

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5 Conclusions

5.1 The Greater Norwich Local Plan with the proposed Gypsy and Traveller site allocations, acting alone

5.1.1 It is ascertained that the published Greater Norwich Local Plan regulation 19 Proposed Submission Draft together with additional allocations for Gypsy and Traveller sites would have no adverse affect upon the integrity of any European site acting alone, subject to satisfactory policy modification with respect to Nutrient Neutrality.

5.2 The Greater Norwich Local Plan in combination with other plans or projects

5.2.1 It is ascertained that the published Greater Norwich Local Plan regulation 19 Proposed Submission Draft together with additional allocations for Gypsy and Traveller sites would have no adverse affect upon the integrity of any European site, subject to satisfactory policy modification with respect to Nutrient Neutrality, in combination with any other Local Plan or other projects.

5.3 Overall conclusion

5.3.1 It is concluded that **subject to policy modification with respect to Nutrient Neutrality** there would be no adverse affect upon the integrity of any European site.

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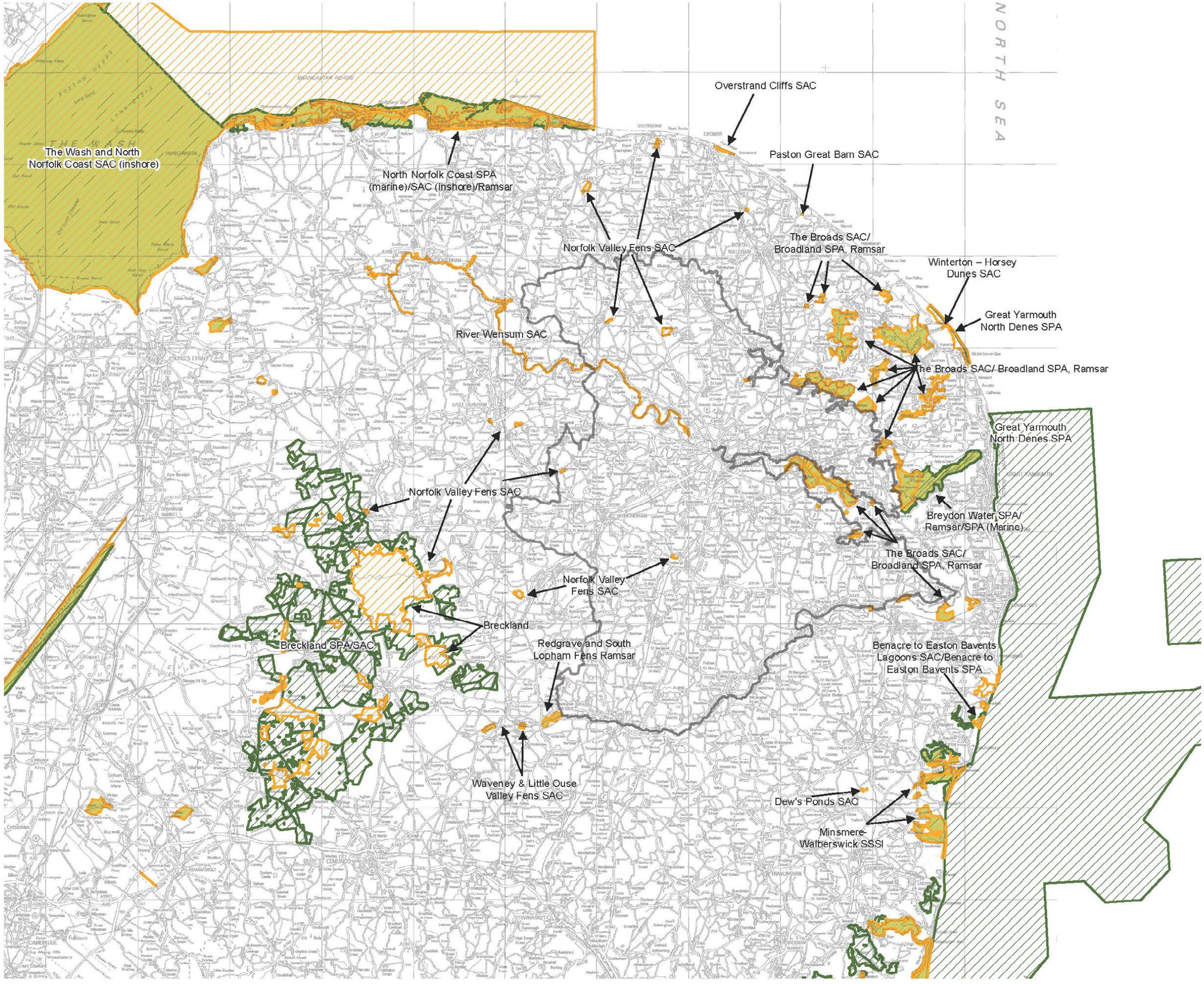
Figure 01



Key

- Greater Norwich Boundary
- Special Areas of Conservation
- Special Protection Areas
- RAMSAR

E16845 Greater Norwich Local Plan

European site locations

Figure 01

Scale 1:400,000 @ A3

August 2017

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Appendix 1

European sites

River Wensum SAC		
Site description summary	**Qualifying features**[61]	
A calcareous lowland river considered one of the best areas in the UK for Ranunculion fluitantis and Callitricho-Batrachion vegetation. Also significant for the presence of Brook Lamprey, Bullhead and Desmoulin's whorl snail. One of the best areas in the UK for the native White-clawed Crayfish. At the upper reaches, run-off from calcareous soils rich in plant nutrients feeds beds of submerged and emerged vegetation characteristic of chalk streams. Lower, the chalk is overlain by boulder clay, resulting in aquatic plant communities more characteristic of rivers with mixed substrates.	3260	Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation
	7210	Calcareous fens with Cladium mariscus and species of the Caricion davallianae
	91E0	Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)
	1092	Austropotamoblus pallipes (White-clawed (or Atlantic steam) Crayfish)
	1163	Cottus gobio (Bullhead)
	1096	Lampetra planeri (Brook Lamprey)
	1016	Vertigo moulinsiana (Desmoulin's whorl snail)
Component SSSI/s[62]		
River Wensum SSSI	Covers 385.96ha and contains 55 units. 11.05% of area in Favourable condition, 47.70% of area in Unfavourable-Recovering condition, 41.25% of area in Unfavourable-No change condition.	
Conservation Objectives[63]		
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;	• The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.	

Norfolk Valley Fens SAC		
Site description summary	**Qualifying features**[64]	
A series of valley-head spring-fed fens, typified by black-bog-rush - blunt-flowered	4010	North Atlantic wet heaths with Erica tetralix

[61] Taken from the Natura 2000 Standard data form for site UK0012647 River Wensum SAC dated 25-01-16.
[62] Condition status taken from Natural England data on 3 December 2019.
[63] Taken from Natural England's European Site Conservation Objectives for River Wensum SAC dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice.
[64] Taken from the Natura 2000 Standard data form for site UK0012892 Norfolk Valley Fens SAC dated 25-01-16.

rush *Schoenus nigricans - Juncus subnodulosus* mire. There are also transitions to reedswamp, other fen and wet grassland types, and gradations from calcareous fens into acidic flush communities. Plant species present include marsh helleborine *Epipactis palustris*, narrow-leaved marsh-orchid *Dactylorhiza traunsteineri*, and alder *Alnus glutinosa* which forms carr woodland in places by streams. Marginal fens associated with pingos-pools originating from the thawing of large blocks of ice at the end of the last Ice Age support several large populations of Desmoulin's whorl snail *Vertigo moulinsiana*.	4030	European dry heaths
	6210	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*important orchid sites)
	6410	Molinia meadows on calcareous, peaty, or clayey-silt-laden soils (Molinion caeruleae)
	7150	Depressions on peat substrates of the Rhynchosporion
	7210	Calcareous fens with Cladium mariscus and species of the Caricion davallianae
	7230	Alkaline fens
	91E0	Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)
	1355	Lutra Lutra (Eurasian Otter)
	1166	Triturus cristatus (Great Crested Newt)
	1014	Vertigo angustior (Narrow-mouthed whorl snail)
	1016	Vertigo moulinsiana (Desmoulin's whorl snail)
Component SSSI/s[65]		
Badley Moor SSSI	Covers 18.33ha and contains 4 units. 100% of area in Favourable condition	
Booton Common SSSI	Covers 8.19ha and contains 1 unit. 100% of area in Unfavourable-Recovering condition.	
Buxton Heath SSSI	Covers 67.32ha and contains 1 unit. 100% of area in Unfavourable-Recovering condition.	
Coston Fen, Runhall SSSI	Covers 7.11ha and contains 1 unit. 100% of area in Unfavourable-No change condition.	
East Walton and Adcock's Common SSSI	Covers 62.41ha and contains 3 units. 100% of area in Unfavourable-Recovering condition.	
Flordon Common SSSI	Covers 9.91ha and contains 2 units. 19.57% of area in Favourable condition, 80.43% of area in Unfavourable-Recovering condition.	
Foulden Common SSSI	Covers 139ha and contains 7 units. 24.74% of area in Favourable condition, 61.51% of area in Unfavourable-Recovering condition, 13.75% of area in Unfavourable-Declining condition.	
Great Cressingham Fen SSSI	Covers 14.33ha and contains 1 unit. 100% of area in Unfavourable-Recovering condition.	
Holt Lowes SSSI	Covers 49.91ha and contains 2 units. 30.07% of area in Favourable condition, 69.93% of area in Unfavourable-Recovering condition.	

[65] Condition status taken from Natural England data on 3rd December 2019.

Potter & Scarning Fens, East Dereham SSSI	Covers 6.20ha and contains 2 units. 100% of area in Unfavourable-Recovering condition.
Sheringham and Beeston Regis Commons SSSI	Covers 24.94ha and contains 2 units. 100% of area in Unfavourable-Recovering condition.
Southrepps Common SSSI	Covers 5.57ha and contains 1 unit. 100% of area in Unfavourable-Recovering condition.
Swangey Fen, Attleborough SSSI	Covers 48.39ha and contains 6 units. 44.44% of area in Favourable condition, 55.56% of area in Unfavourable-Recovering condition.
Thompson Water, Carr and Common SSSI	Covers 154.74ha and contains 11 units. 73.05% of area in Favourable condition, 22.72% of area in Unfavourable-Recovering condition, 4.24% of area in Unfavourable-Declining condition.
Conservation Objectives[66]	
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;	• The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.

The Broads SAC/ Broadland SPA, Ramsar		
Site description summary	**SAC qualifying features**[67]	
A low-lying wetland complex connecting the Bure, Yare, Thurne, and Waveney River systems. Wetland habitats form a mosaic of open water, reedbeds, carr woodland, grazing marsh, and fen meadow, with an extensive network of medieval peat excavations. The Site boasts a rich array of flora and fauna. The SPA is designated for supporting a number of rare or vulnerable (Article 4.1) Annex I bird species during the breeding season. In addition, the SPA is designated for supporting regularly occurring migratory (Article 4.2) species during the breeding season and over winter.	3140	Hard oligo-mesotrophic waters with benthic vegetation of Chara spp.
	3150	Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation
	6410	Molinia meadows on calcareous, peaty, or clayey-silt-laden soils (Molinion caeruleae)
	7140	Transition mires and quaking bogs
	7210	Calcareous fens with Cladium mariscus and species of the Caricion davallianae
	7230	Alkaline fens
	91E0	Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)

[66] Taken from Natural England's European Site Conservation Objectives for Norfolk Valley Fens SAC dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice.
[67] Taken from the Natura 2000 Standard data form for site UK0013577 The Broads SAC dated 25-01-16.

	4056	Anisus vorticulus (Little whorlpool ram's-horn snail)
	1903	Liparis loeselii (Fen Orchid)
	1355	Lutra Lutra (Eurasian Otter)
	1166	Triturus cristatus (Great Crested Newt)
	1016	Vertigo moulinsiana (Desmoulin's whorl snail)
	SPA qualifying features[68]	
	A056	Anas clypeata (Shoveler) (over winter)
	A050	Anas penelope (Wigeon) (over winter)
	A051	Anas strepera (Gadwall) (over winter)
	A021	Botaurus stellaris (Bittern) (breeding)
	A081	Circus aeruginosus (Marsh Harrier) (breeding)
	A082	Circus cyaneus (Hen Harrier) (over winter)
	A037	Cygnus columbianus bewickii (Bewick's Swan) (over winter)
	A038	Cygnus cygnus (Whooper Swan) (over winter)
	A151	Philomachus pugnax (Ruff) (over winter)
	Ramsar qualifying features[69]	
	H7210	Calcareous fens with Cladium mariscus and species of the Caricion davallianae Calcium-rich fen dominated by great fen sedge (saw sedge).
	H7230	Alkaline fens Calcium-rich springwater-fed fens.
	H91E0	Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) Alder woodland on floodplains, and the Annex II species
	S1016	Vertigo moulinsiana (Desmoulin`s whorl snail)
	S1355	Lutra lutra (Eurasian Otter)
	S1903	Liparis loeselii Fen Orchid
		Cygnus columbianus bewickii, NW Europe (Tundra (Bewick's) Swan)
		Anas penelope (Eurasian Wigeon)
		Anas strepera strepera (Gadwall)
		Anas clypeata (Shoveler)

[68] Taken from the Natura 2000 Standard data form for site UK9009253 Broadland SPA dated 25-01-16.
[69] Taken from the Ramsar Information Sheet for Broadland dated 21-09-94.

Component SSSI/s[70]	
Alderfen Broad SSSI	Covers 21.34ha and contains 3 units. 8.65% of area in Favourable condition, 91.35% of area in Unfavourable-Recovering condition.
Ant Broads and Marshes SSSI	Covers 745.27ha and contains 35 units. 54.39% of area in Favourable condition, 39.18% of area in Unfavourable-Recovering condition.
Barnby Broad & Marshes SSSI	Covers 192.69ha and contains 24 units. 59.93% of area in Favourable condition, 40.07% of area in Unfavourable-Recovering condition.
Broad Fen, Dilham SSSI	Covers 38.43ha and contains 1 unit. 100% of area in Unfavourable-Recovering condition.
Bure Broads and Marshes SSSI	Covers 741.15ha and contains 14 units. 43.08% in Favourable condition, 46.85% in Unfavourable-Recovering condition, 10.07% in Unfavourable-No change condition.
Burgh Common and Muckfleet Marshes SSSI	Covers 121.54ha and contains 9 units. 27.72% of area in Favourable condition, 68.76% of area in Unfavourable-Recovering condition, 3.52% of area in Unfavourable-No change condition.
Calthorpe Broad SSSI	Covers 43.54ha and contains 3 units. 97.68% of area in Favourable condition, 2.32% of area in Unfavourable-Recovering condition.
Cantley Marshes SSSI	Covers 272.11ha and contains 3 units. 100% of area in Favourable condition.
Crostwick Marsh SSSI	Covers 11.57ha and contains 1 unit. 100% of area in Unfavourable-No change condition.
Damgate Marshes, Acle SSSI	Covers 64.68ha and contains 10 units. 74.73% of area in Favourable condition, 25.27% of area in Unfavourable-Recovering condition.
Decoy Carr, Acle SSSI	Covers 56.01ha and contains 6 units. 70.21% of area in Favourable condition, 29.79% of area in Unfavourable-Recovering condition.
Ducan's Marsh, Claxton SSSI	Covers 3.58ha and contains 2 units. 100% of area in Unfavourable-Recovering condition.
Geldeston Meadows SSSI	Covers 13.98ha and contains 2 units. 97.18% of area in Unfavourable-No change condition, 2.82% of area in Unfavourable-Declining condition.
Hall Farm Fen, Hemsby SSSI	Covers 9.15ha and contains 1 unit. 100% of area in Favourable condition.
Halvergate Marshes SSSI	Covers 1432.72ha and contains 42 units. 72.75% of area in Favourable condition, 23.71% of area in Unfavourable-Declining condition, 3.54% of area in Unfavourable-No change condition.
Hardley Flood SSSI	Covers 49.79ha and contains 2 units. 100% of area in Favourable condition.
Limpenhoe Meadows SSSI	Covers 11.95ha and contains 1 unit. 100% of unit in Unfavourable-Recovering condition.

[70] Condition status taken from Natural England data on 17th June 2019.

Ludham – Potter Heigham Marshes SSSI	Covers 101.51ha and contains 6 units. 100% of area in Favourable condition.
Poplar Farm Meadows, Langley SSSI	Covers 7.55ha and contains 1 unit. 100% of area in Favourable condition.
Priory Meadows, Hickling SSSI	Covers 23.94ha and contains 2 units. 29.79% of area in Favourable condition, 70.21% of area in Unfavourable-Recovering condition.
Shallam Dyke Marshes, Thurne SSSI	Covers 69.80ha and contains 8 units. 4.44% of area in Favourable condition, 95.56% of area in Unfavourable-No change condition.
Smallburgh Fen SSSI	Covers 7.63ha and contains 1 unit. 100% of area in Favourable condition.
Sprat's Water and Marshes, Carlton Colville SSSI	Covers 57.14ha and contains 11 units. 80.48% of area in Favourable condition, 19.19% of area in Unfavourable-Recovering condition, 0.33% of area in Unfavourable-No change condition.
Stanley and Alder Carrs, Aldeby SSSI	Covers 42.68ha and contains 3 units. 100% of area in Unfavourable-Recovering condition.
Trinity Broads SSSI	Covers 316.83ha and contains 23 units. 45.48% of area in Favourable condition, 41.98% of area in Unfavourable-Recovering condition, 12.54% of area in Unfavourable-No change condition.
Upper Thurne Broads and Marshes SSSI	Covers 1185.93ha and contains 19 units. 63.97% of area in Favourable condition, 16.65% of area in Unfavourable-Recovering condition, 4.82% of area in Unfavourable-No change condition, 14.57% of area in Unfavourable-Declining condition.
Upton Broad & Marshes SSSI	Covers 195.44ha and contains 18 units. 7.43% of area in Favourable condition, 91.84% of Unfavourable-Recovering condition, 0.72% of area in Unfavourable-No change condition.
Yare Broads and Marshes SSSI	Covers 744.46ha and contains 28 units. 39.22% of area in Favourable condition, 11.30% of area in Unfavourable-Recovering condition, 47.27% of area in Unfavourable-No change condition, 2.20% of area in Unfavourable-Declining condition.
SAC Conservation Objectives[71]	
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;	• The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.

[71] Taken from Natural England's European Site Conservation Objectives for The Broads SAC dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice.

SPA Conservation Objectives[72]	
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;	• The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site.

Breydon Water SPA/Ramsar/SPA (Marine)		
Site description summary	**SPA qualifying features**[73]	
An inland tidal estuary at the mouth of the River Yare and its confluence with the Rivers Bure and Waveney. Extensive areas of mud-flats form the only tidal flats on the east Norfolk coast. The Site also features much floodplain grassland, which lies adjacent to the intertidal areas. It is internationally important for wintering waterbirds, some of which feed in the Broadland Ramsar that adjoins this site at Halvergate Marshes. This SPA is part of the Breydon Water European Marine Site.	A037	Cygnus columbianus bewickii (Bewick's (Tundra) Swan) (over winter)
	A151	Philomachus pugnax (Ruff) (concentration)
	A140	Pluvialis apricaria (Golden Plover) (over winter)
	A132	Recurvirostra avosetta (Avocet) (over winter)
	A193	Sterna hirundo (Common Tern) (breeding)
	A142	Vanellus vanellus (Northern Lapwing) (over winter)
		Waterbird assemblage
	Ramsar qualifying features[74]	
	Internationally important waterfowl assemblage (greater than 20000 birds)	
	Over winter the site regularly supports internationally important numbers of: Bewick's Swan Cygnus columbianus bewickii and Lapwing Vanellus vanellus	
Component SSSI/s[75]		
Breydon Water SSSI	Covers 514.40ha and contains 15 units. 100% of area in Favourable condition.	
Halvergate Marshes SSSI	Covers 1432.72ha and contains 42 units. 72.75% of area in Favourable condition, 23.71% of area in Unfavourable-Declining condition, 3.54% of area in Unfavourable-No change condition.	

[72] Taken from Natural England's European Site Conservation Objectives for Broadland SPA dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice.
[73] Taken from the Natura 2000 Standard data form for site UK9009181 Breydon Water SPA dated 25-01-16.
[74] Taken from the Ramsar Information Sheet for Breydon Water dated Feb 2000.
[75] Condition status taken from Natural England data on 17th June 2019.

Conservation Objectives[76]	
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;	• The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site.

Great Yarmouth North Denes SPA		
Site description summary	**Qualifying features**[77]	
Low dunes stabilised by marram grass *Ammophila arenaria* with extensive areas of grey hair-grass *Corynephorus canescens*. The Site supports important numbers of little tern *Sterna albifrons* that feed in waters close to the SPA. This SPA is part of the Great Yarmouth North Denes European Marine Site (EMS).	A195	Sterna albifrons (Little Tern) (breeding)
Component SSSI/s[78]		
Great Yarmouth North Denes SSSI	Covers 100.75ha and contains 2 units. 100% of area in Favourable condition.	
Winterton – Horsey Dunes SSSI	Covers 426.95ha and contains 12 units. 67.92% of area in Favourable condition, 9.88% of area in Unfavourable-Recovering condition, 22.20% of area in Unfavourable-No change condition.	
Conservation Objectives[79]		
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;	• The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site.	

Winterton – Horsey Dunes SAC

[76] Taken from Natural England's European Site Conservation Objectives for Breydon Water SPA dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice, and should be used in conjunction with the Regulation 35 Conservation Advice Package for the EMS.
[77] Taken from the Natura 2000 Standard data form for site UK9009271 Great Yarmouth North Denes SPA dated 25-01-16.
[78] Condition status taken from Natural England data on 17th June 2019.
[79] Taken from Natural England's European Site Conservation Objectives for Great Yarmouth North Denes SPA dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice, and should be used in conjunction with the Regulation 35 Conservation Advice Package for the EMS.

Site description summary	Qualifying features[80]	
The only significant area of dune heath on the east coast of England, which occur over an extremely base-poor dune system, and include areas of acidic dune grassland as an associated acidic habitat. These acidic soils support swamp and mire communities, in addition to common dune slack vegetation, including creeping willow *Salix repens* subsp. *argentea* and Yorkshire fog *Holcus lanatus*. The drought resistant grey hair-grass *Corynephorus canescens* is characteristic of open areas.	2110	Embryonic shifting dunes
	2120	Shifting dunes along the shoreline with Ammophila arenaria ("white dunes")
	2150	Atlantic decalcified fixed dunes (Calluno-Ulicetea)
	2160	Dunes with Hippophae rhamnoides
	2190	Humid dune slacks
	1166	Triturus cristatus (Great Crested Newt)
Component SSSI/s[81]		
Winterton – Horsey Dunes SSSI	Covers 426.95ha and contains 12 units. 67.92% of area in Favourable condition, 9.88% of area in Unfavourable-Recovering condition, 22.20% of area in Unfavourable-No change condition.	
Conservation Objectives[82]		
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;	• The extent and distribution of the qualifying natural habitats • The structure and function (including typical species) of the qualifying natural habitats, and, • The supporting processes on which the qualifying natural habitats rely.	

Paston Great Barn SAC		
Site description summary	**Qualifying features**[83]	
Nationally, this is an extremely rare example of a maternity roost of barbastelle bats *Barbastella barbastellus* in a building. A 16th century thatched barn with associated outbuildings. The maternity colony inhabits many crevices and cracks in the roof timbers.	1308	Barbastella barbastellus (Barbastelle bat) (permanent population)
Component SSSI/s[84]		
Paston Great Barn SSSI	Covers 0.96ha and contains 1 unit. 100% of area in Favourable condition.	

[80] Taken from the Natura 2000 Standard data form for site UK0013043 Winterton – Horsey Dunes SAC dated 25-01-16.
[81] Condition status taken from Natural England data via Magic Map on 7th March 2017.
[82] Taken from Natural England's European Site Conservation Objectives for Winterton-Horsey Dunes SAC dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice.
[83] Taken from the Natura 2000 Standard data form for site UK0030235 Paston Great Barn SAC dated December 2015.
[84] Condition status taken from Natural England data on 17th June 2019.

Conservation Objectives[85]	
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;	• The extent and distribution of the habitats of qualifying species • The structure and function of the habitats of qualifying species • The supporting processes on which the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.

Overstrand Cliffs SAC		
Site description summary	**Qualifying features**[86]	
Vegetated soft cliffs composed of Pleistocene clays and sands, subject to common cliff-falls and landslips. Vegetation undergoes cycles whereby ruderal-dominated communities develop on the newly exposed sands and mud, succeeded by more stable grassland and scrub vegetation. In areas where freshwater seepages occur there are fen communities and occasional perched reedbeds. The diverse range of habitats support a large number of invertebrate species.	1230	Vegetated sea cliffs of the Atlantic and Baltic Coasts
Component SSSI/s[87]		
Overstrand Cliffs SSSI	Covers 57.75ha and contains 2 units. 100% of area in Favourable condition.	
Conservation Objectives[88]		
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;	• The extent and distribution of the qualifying natural habitats • The structure and function (including typical species) of the qualifying natural habitats, and • The supporting processes on which the qualifying natural habitats rely.	

Waveney & Little Ouse Valley Fens SAC		
Site description summary	**Qualifying features**[89]	
Calcareous fen containing extensive beds of great fen-sedge *Cladium mariscus*. Purple moor-grass – meadow thistle *Molinia caerulea* – *Cirsium dissectum* fen-meadows, associated with the spring-fed valley fen systems, occur	6410	Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)

[85] Taken from Natural England's European Site Conservation Objectives for Paston Great Barn SAC dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice.
[86] Taken from the Natura 2000 Standard data form for site UK0030232 Overstrand Cliffs SAC dated December 2015.
[87] Condition status taken from Natural England data on 17th June 2019.
[88] Taken from Natural England's European Site Conservation Objectives for Overstrand Cliffs SAC dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice.
[89] Taken from the Natura 2000 Standard data form for site UK0012882 Waveney and Little Ouse Valley Fens SAC dated December 2015.

in conjunction with black bog-rush – blunt-flowered rush *Schoenus nigricans – Juncus subnodulosus* mire and calcareous fens with great fen-sedge. Grazed areas of fen-meadow are more species-rich, and frequently support southern marsh-orchid *Dactylorhiza praetermissa*.	7210	Calcareous fens with Cladium mariscus and species of the Caricion davallianae
	1016	Vertigo moulinsiana (Desmoulin's whorl snail)
Component SSSI/s[90]		
Blo' Norton and Thelnetham Fen SSSI	Covers 21.32ha and contains 6 units. 35.08% of area in Favourable condition, 64.92% of area in Unfavourable-Recovering condition.	
Redgrave and Lopham Fens SSSI	Covers 127.03ha and contains 4 units. 100% of area in Unfavourable-Recovering condition.	
Weston Fen SSSI	Covers 49.73ha and contains 10 units. 49.79% of area in Favourable condition, 33.02% of area in Unfavourable-Recovering condition, 17.19% of area in Unfavourable-No change condition.	
Conservation Objectives[91]		
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;	• The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.	

Redgrave and South Lopham Fens Ramsar	
Site description summary	**Qualifying features**[92]
An extensive area of spring-fed valley fen at the headwaters of the River Waveney which supports a variety of fen plant community types, including *Molinia*-based grasslands, mixed sedge-fen, and reed-dominated fen. Small areas of wet heath, sallow carr, and birch woodland also occur, and the Site is known to support the fen raft spider *Dolomedes plantarius*.	The site is an extensive example of spring-fed lowland base-rich valley, remarkable for its lack of fragmentation.
	The site supports many rare and scarce invertebrates, including a population of the fen raft spider *Dolomedes plantarius*. This spider is also considered vulnerable by the IUCN Red List.

[90] Condition status taken from Natural England data on 17th June 2019.
[91] Taken from Natural England's European Site Conservation Objectives for Waveney and Little Ouse Valley Fens SAC dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice.
[92] Taken from the Ramsar Information Sheet for Redgrave and South Lopham Fen Ramsar dated May 2005.

	The site supports many rare and scarce invertebrates, including a population of the fen raft spider *Dolomedes plantarius*. The diversity of the site is due to the lateral and longitudinal zonation of the vegetation types characteristic of valley mires.
Component SSSI/s[93]	
Redgrave and Lopham Fens SSSI	Covers 127.03ha and contains 4 units. 100% of area in Unfavourable-Recovering condition.
Conservation Objectives	
n/a	

Breckland SPA/SAC		
Site description summary	**SPA qualifying features**[94]	
A gently rolling plateau underlain by cretaceous chalk bedrock covered with thin deposits of sand and flint. The climate and free-draining soils has produced dry heath and grassland communities. Pingos with biological interest occur in some areas. The highly variable soils of Breckland, with underlying chalk being largely covered with wind-blown sands, have resulted in mosaics of heather-dominated heathland, acidic grassland and calcareous grassland that are unlike those of any other site. Breckland is the most extensive surviving area of the rare sheep's fescue – mouse-ear hawkweed – wild thyme *Festuca ovina – Hieracium pilosella – Thymus praecox* grassland type. A number of the water bodies within the site support populations of amphibians, including great crested newts *Triturus cristatus*.	A133	Burhinus oedicnemus (Stone Curlew) (breeding)
	A224	Caprimulgus europaeus (Nightjar) (breeding)
	A246	Lullula arborea (Woodlark) (breeding)
	SAC qualifying features[95]	
	2330	Inland dunes with open Corynephorus and Agrostis grasslands
	3150	Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation
	4030	European dry heaths
	6210	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)
	91E0	Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)
	1308	Barbastella barbastellus (Barbastelle bat)
	1166	Triturus cristatus (Great Crested Newt)

[93] Condition status taken from Natural England data on 17th June 2019.
[94] Taken from the Natura 2000 Standard data form for site UK9009201 Breckland SPA dated December 2015.
[95] Taken from the Natura 2000 Standard data form for site UK0019865 Breckland SAC dated December 2015.

Component SSSI/s[96] (within SPA, SAC or both)	
Barnham Heath SSSI	Covers 78.62ha and contains 2 units. 89.45% of area in Favourable condition, 10.55% of area in Unfavourable-Recovering condition.
Barnhamcross Common SSSI	Covers 69.08ha and contains 2 units. 100% of area in Unfavourable-Recovering condition.
Berner's Heath, Icklingham SSSI	Covers 235.86ha and contains 3 units. 97.09% of area in Favourable condition, 2.91% of area destroyed.
Breckland Farmland SSSI	Covers 13392.36ha and contains 70 units. 100% of area in Favourable condition.
Breckland Forest SSSI	Covers 18125.99ha and contains 7 units. 0.09% of area in Favourable condition, 99.91% of area in Unfavourable-Recovering condition.
Bridgham & Brettenham Heaths SSSI	Covers 439.91ha and contains 6 units. 12.75% of area in Favourable condition, 87.25% of area in Unfavourable-Recovering condition.
Cavenham – Icklingham Heaths SSSI	Covers 419.01ha and contains 27 units. 30.59% of area in Favourable condition, 65.03% of area in Unfavourable-Recovering condition, 1.78% of area in Unfavourable-No change condition. 2.59% destroyed.
Cranberry Rough, Hockham SSSI	Covers 81.13ha and contains 4 units. 21.62% of area in Favourable condition, 78.38% of area in Unfavourable-Recovering condition.
Cranwich Camp SSSI	Covers 13.10ha and contains 1 unit. 100% of area in Unfavourable-Recovering condition.
Deadman's Grave, Icklingham SSSI	Covers 127.33ha and contains 6 units. 14.17% of area I Favourable condition, 83.80% of area in Unfavourable-Recovering condition, 2.03% of area in Unfavourable-Declining condition.
East Wretham Heath SSSI	Covers 141.05ha and contains 6 units. 7% of area in Favourable condition, 89.08% of area in Unfavourable-Recovering condition, 3.92% of area in Unfavourable-Declining condition.
Eriswell Low Warren SSSI	Covers 7.42ha and contains 1 unit. 100% of area in Favourable condition.
Field Barn Heaths, Hilborough SSSI	Covers 17.86ha and contains 1 unit. 100% of area in Unfavourable-Recovering condition.
Foxhole Heath, Eriswell SSSI	Covers 85.17ha and contains 1 unit. 100% of area in Favourable condition.
Gooderstone Warren SSSI	Covers 21.63ha and contains 4 units. 100% of area in Unfavourable-Recovering condition.
Grime's Graves SSSI	Covers 66.12ha and contains 3 units. 26.79% of area in Favourable condition, 73.21% of area in Unfavourable-Recovering condition.
How Hill Track SSSI	Covers 3.11ha and contains 1 unit. 100% of area in Favourable condition.
Lakenheath Warren SSSI	Covers 588.33ha and contains 11 units. 1.62% of area in Favourable condition, 63.40% of area in

[96] Condition status taken from Natural England data via Magic Map on 3 December 2019.

	Unfavourable-Recovering condition, 34.99% of area in Unfavourable-No change condition.
RAF Lakenheath SSSI	Covers 111ha and contains 4 units. 100% of area in Favourable condition.
Little Heath, Barnham SSSI	Covers 46.25ha and contains 3 units. 13.52% of area in Favourable condition, 2.59% of area in Unfavourable-Recovering condition, 83.89% of area in Unfavourable-Declining condition.
Old Bodney Camp SSSI	Covers 32.76ha and contains 2 units. 100% of area in Favourable condition.
Rex Graham Reserve SSSI	Covers 2.76ha and contains 1 unit. 100% of area in Favourable condition.
Stanford Training Area SSSI	Covers 4677.96ha and contains 81 units. 42.12% of area in Favourable condition, 54.71% of area in Unfavourable-Recovering condition, 3.12% of area in Unfavourable-No change condition, 0.05% of area in Unfavourable-Declining condition.
Thetford Golf Course & Marsh SSSI	Covers 122.30ha and contains 8 units. 3.12% of area in Favourable condition, 67.83% of area in Unfavourable-Recovering condition, 29.05% of area in Unfavourable-No change condition.
Thetford Heaths SSSI	Covers 270.58ha and contains 4 units. 36.32% of area in Favourable condition, 57.06% of area in Unfavourable-Recovering condition, 6.62% of area in Unfavourable-No change condition.
Wangford Warren and Carr SSSI	Covers 67.79ha and contains 5 units. 22.65% of area in Favourable condition, 77.35% of area in Unfavourable-Recovering condition.
Weather and Horn Heaths, Eriswell SSSI	Covers 133.32ha and contains 3 units. 97.77% of area in Unfavourable-Declining condition, 2.23% of area Partially destroyed.
Weeting Heath SSSI	Covers 141.75ha and contains 6 units. 40.15% of area in Favourable condition, 38.97% of area in Unfavourable-Recovering condition, 20.88% of area in Unfavourable-No change condition.
West Stow Heath SSSI	Covers 44.30ha and contains 5 units. 14.51% of area in Favourable condition, 85.49% of area in Unfavourable-Recovering condition.
SPA Conservation Objectives[97]	
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;	• The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and,

[97] Taken from Natural England's European Site Conservation Objectives for Breckland SPA dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice.

	• The distribution of the qualifying features within the site
SAC Conservation Objectives[98]	
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;	• The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.

Benacre to Easton Bavents Lagoons SAC/Benacre to Easton Bavents SPA		
Site description summary	**SAC qualifying features**[99]	
Situated on the east coast of Suffolk, this site includes semi-natural broadleaved woodland, tall fen vegetation, shingle, dunes and grassland, saltmarsh and coastal lagoons. The habitats are important for breeding, wintering and passage birds. There are a series of percolating lagoons that have formed behind shingle barriers and are a feature of a geomorphologically dynamic system. The site supports a number of specialist lagoonal species. The SPA is part of the Benacre to Easton Bavents European Marine Site.	1150	Coastal lagoons
	91E0	Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)
	SPA qualifying features[100]	
	A021	Botaurus stellaris (Bittern) (breeding)
	A081	Circus aeruginosus (Marsh Harrier) (breeding)
	A195	Sterna albifrons (Little Tern) (breeding)
Component SSSI/s[101]		
Pakefield to Easton Bavents SSSI	Covers 735.45ha and contains 51 units. 48.73% of area in Favourable condition, 38.98% of area in Unfavourable-Recovering condition, 8.73% of area in Unfavourable-No change condition, 3.11% Unfavourable-Declining condition, 0.45% of area Partially destroyed.	
SAC Conservation Objectives[102]		
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its	• The extent and distribution of qualifying natural habitats • The structure and function (including typical species) of qualifying natural habitats, and	

[98] Taken from Natural England's European Site Conservation Objectives for Breckland SAC dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice.
[99] Taken from the Natura 2000 Standard data form for site UK0013104 Benacre to Easton Bavents Lagoons SAC dated December 2015.
[100] Taken from the Natura 2000 Standard data form for site UK9009291 Benacre to Easton Bavents SPA dated December 2015.
[101] Condition status taken from Natural England data on 17th June 2019.
[102] Taken from Natural England's European Site Conservation Objectives for Benacre to Easton Bavents Lagoons SAC dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice.

Qualifying Features, by maintaining or restoring;	• The supporting processes on which qualifying natural habitats rely.
SPA Conservation Objectives[103]	
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;	• The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site.

Dew's Ponds SAC		
Site description summary	**Qualifying features**[104]	
A series of 12 ponds located in rural East Suffolk, in formerly predominantly arable land. Great Crested Newt has been found in all ponds. Some of the arable land has been converted to grassland and there are also hedgerows and ditches.	1166	Triturus cristatus (Great Crested Newt)
Component SSSI/s[105]		
Dew's Ponds SSSI	Covers 6.72ha and contains 4 units. 100% of area in Favourable condition.	
Conservation Objectives[106]		
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;	• The extent and distribution of the habitats of qualifying species • The structure and function of the habitats of qualifying species • The supporting processes on which the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.	

The Wash and North Norfolk Coast SAC (inshore)		
Site description summary	**Qualifying features**[107]	
The Wash is the largest embayment in the UK and is connected to the North Norfolk Coast	1110	Sandbanks which are slightly covered by sea water all the time

[103] Taken from Natural England's European Site Conservation Objectives for Benacre to Easton Bavents SPA dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice, and should be used in conjunction with the Regulation 35 Conservation Advice Package for the EMS.
[104] Taken from the Natura 2000 Standard data form for site UK0030133 Dew's Ponds SAC dated December 2015.
[105] Condition status taken from Natural England data on 17th June 2019.
[106] Taken from Natural England's European Site Conservation Objectives for Dew's Ponds SAC dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice.
[107] Taken from the Natura 2000 Standard data form for site UK0017075 The Wash and North Norfolk Coast SAC dated December 2015.

via sediment transfer systems. Together The Wash and North Norfolk Coast form one of the most important marine areas in the UK and European North Sea coast, and include extensive areas of varying, but predominantly sandy, sediments subject to a range of conditions. Communities in the intertidal include those characterised by large numbers of polychaetes, bivalve and crustaceans. Subtidal communities cover a diverse range from the shallow to the deeper parts of the embayments and include dense brittlestar beds and areas of an abundant reef-building worm ('ross worm') Sabellaria spinulosa. The embayment supports a variety of mobile species, including a range of fish, otter Lutra lutra and common seal Phoca vitulina. The extensive intertidal flats provide ideal conditions for common seal breeding and hauling-out. This SAC is part of The Wash and North Norfolk Coast European Marine Site.	1140	Mudflats and sandflats not covered by seawater at low tide
	1150	Coastal lagoons
	1160	Large shallow inlets and bays
	1170	Reefs
	1310	Salicornia and other annuals colonizing mud and sand
	1320	Spartina swards (Spartinion maritimae)
	1330	Atlantic salt meadows (Glauco-Puccinellietalia maritimae)
	1420	Mediterranean and thermo-Atlantic halophilous scrubs (Sarcocornetea fruticosi)
	1364	Halichoerus grypus (Grey Seal)
	1355	Lutra lutra (Eurasian Otter)
	1365	Phoca vitulina (Harbour/Common Seal)
Component SSSI/s		
The Wash SSSI	62045.64ha of which 67.98 is favourable, and 31.61% is unfavourable recovering. 0.41% of the area is unfavourable declining.	
Conservation Objectives[108]		
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;	• The extent and distribution of the habitats of qualifying species • The structure and function of the habitats of qualifying species • The supporting processes on which the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.	

North Norfolk Coast SPA (marine)/SAC (inshore)/Ramsar		
Site description summary	**SAC qualifying features**[109]	
Important within Europe as one of the largest areas of undeveloped coastal habitat of its type, supporting intertidal mudflats and sandflats, coastal waters, saltmarshes, shingle, sand dunes, freshwater grazing marshes, and reedbeds. Large numbers of waterbirds use the Site throughout the year. In Summer, the Site and surrounding area are important for breeding populations of four species of tern, waders, bittern *Botaurus stellaris*, and wetland raptors including marsh harrier *Circus aeruginosus*. In Winter, the Site	1150	Coastal lagoons
	1220	Perennial vegetation of stony banks
	1420	Mediterranean and thermo-Atlantic halophilous scrubs (Sarcocornetea fruticosi)
	2110	Embryonic shifting dunes
	2120	Shifting dunes along the shoreline with Ammophila arenaria ("white dunes")

[108] Taken from Natural England's European Site Conservation Objectives for The Wash and North Norfolk SAC dated 30th June 2014- version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice, and should be used in conjunction with the Regulation 35 Conservation Advice Package for the EMS.
[109] Taken from the Natura 2000 Standard data form for site UK0019838 North Norfolk Coast SAC dated December 2015.

supports large numbers of geese, sea ducks, other ducks and waders using the Site for roosting and feeding. The Site is also important for migratory species during the Spring and Autumn. This SAC is part of the North Norfolk Coast European Marine Site. The SPA is designated for supporting a number of rare or vulnerable (Article 4.1) Annex I bird species during the breeding season. In addition, the SPA is designated for supporting regularly occurring migratory (Article 4.2) species during the breeding season and over winter. This SPA is part of The Wash and North Norfolk Coast European Marine Site (EMS).	2130	Fixed coastal dunes with herbaceous vegetation ("grey dunes")
	2160	Dunes with Hippophae rhamnoides
	2190	Humid dune slacks
	1355	Lutra Lutra (Eurasian Otter)
	1395	Petallophyllum ralfsii (Petalwort)
	1166	Triturus cristatus (Great Crested Newt)
	SPA qualifying features[110]	
	A040	Anser brachyrhynchus (Pink-footed Goose) (over winter)
	A050	Anas penelope (Wigeon) (over winter)
	A021	Botaurus stellaris (Bittern) (breeding)
	A675	Branta bernicla bernicla (Dark-bellied Brent Goose) (over winter)
	A143	Callidris canutus (Red Knot) (over winter)
	A081	Circus aeruginosus (Marsh Harrier) (breeding)
	A132	Recurvirostra avosetta (Avocet) (breeding and over winter)
	A195	Sterna albifrons (Little Tern) (breeding)
	A193	Sterna hirundo (Common tern) (breeding)
	A191	Sterna sandvicensis (Sandwich Tern) (breeding)
	WATR	Waterfowl assemblage
	Ramsar qualifying features[111]	
	The site is one of the largest expanses of undeveloped coastal habitat of its type in Europe. It is a particularly good example of a marshland coast with intertidal sand and mud, saltmarshes, shingle banks and sand dunes. There are a series of brackish-water lagoons and extensive areas of freshwater grazing marsh and reed beds.	
	Supports at least three British Red Data Book and nine nationally scarce vascular plants, one British Red Data Book lichen and 38 British Red Data Book invertebrates.	
	98462 waterfowl peak count in winter (assemblages of international importance)	
	Sterna sandvicensis (Sandwich Tern) (breeding)	
	Sterna hirundo (Common Tern) (breeding)	
	Sterna albifrons (Little Tern) (breeding)	

[110] Taken from the Natura 2000 Standard data form for site UK9009031 North Norfolk Coast SPA dated December 2015.
[111] Taken from the Ramsar Information Sheet for North Norfolk Coast dated 13-06-08.

	Calidris canutus (Red Knot) (over winter)
	Anser brachyrhynchus (Pink-footed Goose) (over winter)
	Branta bernicla bernicla (Dark-bellied Brent goose) (over winter)
	Anas penelope (Wigeon) (over winter)
	Anas acuta (Pintail) (over winter)
Component SSSI/s[112]	
North Norfolk Coast SSSI	Covers 7862.29ha and contains 70 units. 97.82% of area in Favourable condition, 2.18% of area in Unfavourable-Recovering condition.
SAC Conservation Objectives[113]	
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;	• The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.
SPA Conservation Objectives[114]	
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;	• The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site.

Southern North Sea cSAC (offshore and inshore)		
Site description summary	**Qualifying features**[115]	
The Southern North Sea site has been recognised as 'an area of predicted persistent high densities of harbour porpoise'. Therefore, the Southern North Sea site has been submitted to the EU and is a candidate for designation as an Inshore and	1351	Phocoena phocoena (Harbour Porpoise)

[112] Condition status taken from Natural England data on 17th June 2019.
[113] Taken from Natural England's European Site Conservation Objectives for North Norfolk Coast SAC dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice, and should be used in conjunction with the Regulation 35 Conservation Advice Package for the EMS.
[114] Taken from Natural England's European Site Conservation Objectives for North Norfolk Coast SPA dated 30th June 2014-version 2. Should be read in conjunction with the accompanying Supplementary Advice document which provides more detailed advice, and should be used in conjunction with the Regulation 35 Conservation Advice Package for the EMS.
[115] Taken from the Natura 2000 Standard Data Form for Site UK0030395 Southern North Sea SCI dated January 2017.

Offshore SAC for the Annex II species, Harbour Porpoise. The Southern North Sea site extends down the North Sea from the River Tyne, south to the River Thames. The aim of the SAC is to support the maintenance of harbour porpoise populations throughout UK waters (the Southern North Sea supports higher number of porpoises compared to many other parts of their UK range). Seasonal differences in the use of the site by harbour porpoises which show the elevated densities of the species in some parts of the site compared to others during the summer and winter, have been identified. The main threats to harbour porpoise are from incidental catch, pollution and noise/physical disturbance.		
Component SSSI/s		
n/a		
Conservation Objectives[116]		
The focus of the Conservation Objectives for harbour porpoise sites is on addressing pressures that affect site integrity and would include:	• killing or injuring significant numbers of harbour porpoise (directly or indirectly); • preventing their use of significant parts of the site (disturbance / displacement); • significantly damaging relevant habitats; or • significantly reducing the prey base.	
The Conservation Objectives document also contains the following guidance:	The seasonality in porpoise distribution should be considered in the assessment of impacts and proposed management.	

Outer Thames Estuary SPA (marine)/Outer Thames Estuary Extension pSAC (marine)		
Site description summary	**Qualifying features**[117]	
This SPA is entirely marine and is designated because its habitats support 38% of the Great British population of over-wintering Red-throated Diver *Gavia stellata*, a qualifying species under Article 4.1 of the Birds Directive. The Outer Thames Estuary SPA covers vast areas of marine habitat off the east coast between Caister-on-Sea, Norfolk in the north, down to Margate, Kent in the south. The habitats covered by the SPA include marine areas and sea inlets where Red-throated Diver is particularly susceptible to noise and visual disturbance e.g. from wind farms and coastal recreation activities. Threats from effluent discharge, oil spillages and entanglement/drowning in fishing nets are significant.	A001	Gavia stellata (Red-throated Diver) (over winter)

[116] Taken from Natural England's Harbour Porpoise (*Phocoena phocoena*) possible Special Area of Conservation: Southern North Sea Draft Conservation Objectives and Advice on Activities dated January 2016.
[117] Taken from the Natura 2000 Standard Data Form for Site UK9020309 Outer Thames Estuary SPA dated December 2015.

The addition of two new protected features and associated boundary amendments was consulted on in January to July 2016. The proposed extension would afford protection for Little tern and Common tern foraging areas, enhancing protection already afforded to their feeding and nesting areas in the adjacent coastal SPAs (Foulness SPA, Breydon Water SPA and Minsmere to Walberswick SPA).	
Component SSSI/s	
n/a	
Conservation Objectives[118]	
Subject to natural change, maintain or enhance the red-throated diver population and its supporting habitats in favourable condition.	

Haisborough, Hammond and Winterton SAC		
Site description summary	**Qualifying features**[119]	
The site lies off the north east coast of Norfolk and contains a series of sandbanks as well as Sabellaria spinulosa reefs. Small numbers of Harbour Porpoise are regularly observed within the site boundary and a large colony of breeding Grey Seal is known adjacent to the site.	1110	Sandbanks which are slightly covered by sea water all the time
	1170	Reefs
	1364	Halichoerus grypus (Grey Seal)
	1351	Phocoena phocoena (Harbour Porpoise)
Component SSSI/s		
n/a		
Conservation Objectives[120]		
For Annex 1 sandbanks which are slightly covered by seawater all the time:	Subject to natural change maintain the sandbanks in favourable condition, in particular the sub-features: • Low diversity dynamic sand communities • Gravelly muddy sand communities	
For Annex 1 Sabellaria spinulosa reefs:	Subject to natural change maintain or restore the reefs in favourable condition	

[118] Taken from Natural England's Draft advice under Regulation 35(3) of The Conservation of Habitats and Species Regulations 2010 (as amended) and Regulation 18 of The Offshore Marine Conservation (Natural Habitats, & c.) Regulations 2007 (as amended) for Outer Thames Estuary SPA Version 3.7 March 2013.

[119] Taken from the Natura 2000 Standard data form for site UK0030369 Haisborough, Hammond and Winterton SAC dated December 2015.

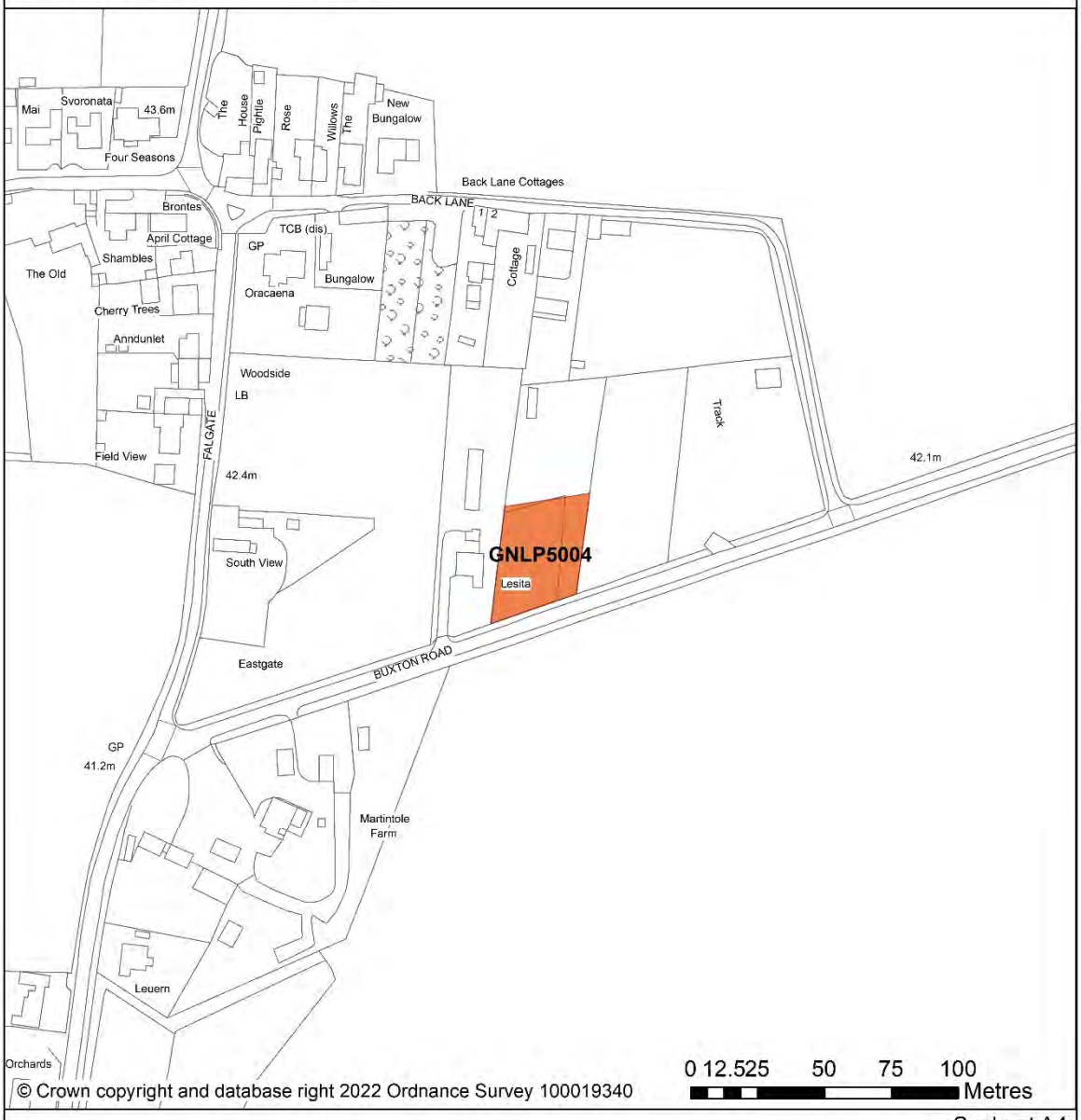
[120] Taken from JNCC and Natural England's Haisborough, Hammond and Winterton candidate Special Area of Conservation Formal advice under Regulation 35(3) of The Conservation of Natural Habitats and Species Regulations 2010 (as amended), and Regulation 18 of The Offshore Marine Conservation Regulations (Natural Habitats,&c.) Regulations 2007 (as amended). Version 6.0 (March 2013).

Appendix 2

CAWSTON

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

SITE REFERENCE: GNLP5004
LOCATION: Land off Buxton Road, Eastgate
DESCRIPTION: 4 residential pitches for Gypsies and Travellers
SITE AREA: 0.12 ha



Proposed Gypsy and Traveller Site

Scale at A4: 1:2,000

N

Date: 20/06/2022

WYMONDHAM

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

SITE REFERENCE: GNLP5005
LOCATION: Wymondham Recycling Centre - off Strayground Lane
DESCRIPTION: 2 Residential pitches for Gypsies and Travellers
SITE AREA: 0.07 ha

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Proposed Gypsy and Traveller Site

Settlement Boundary

Scale at A4: 1:2,000

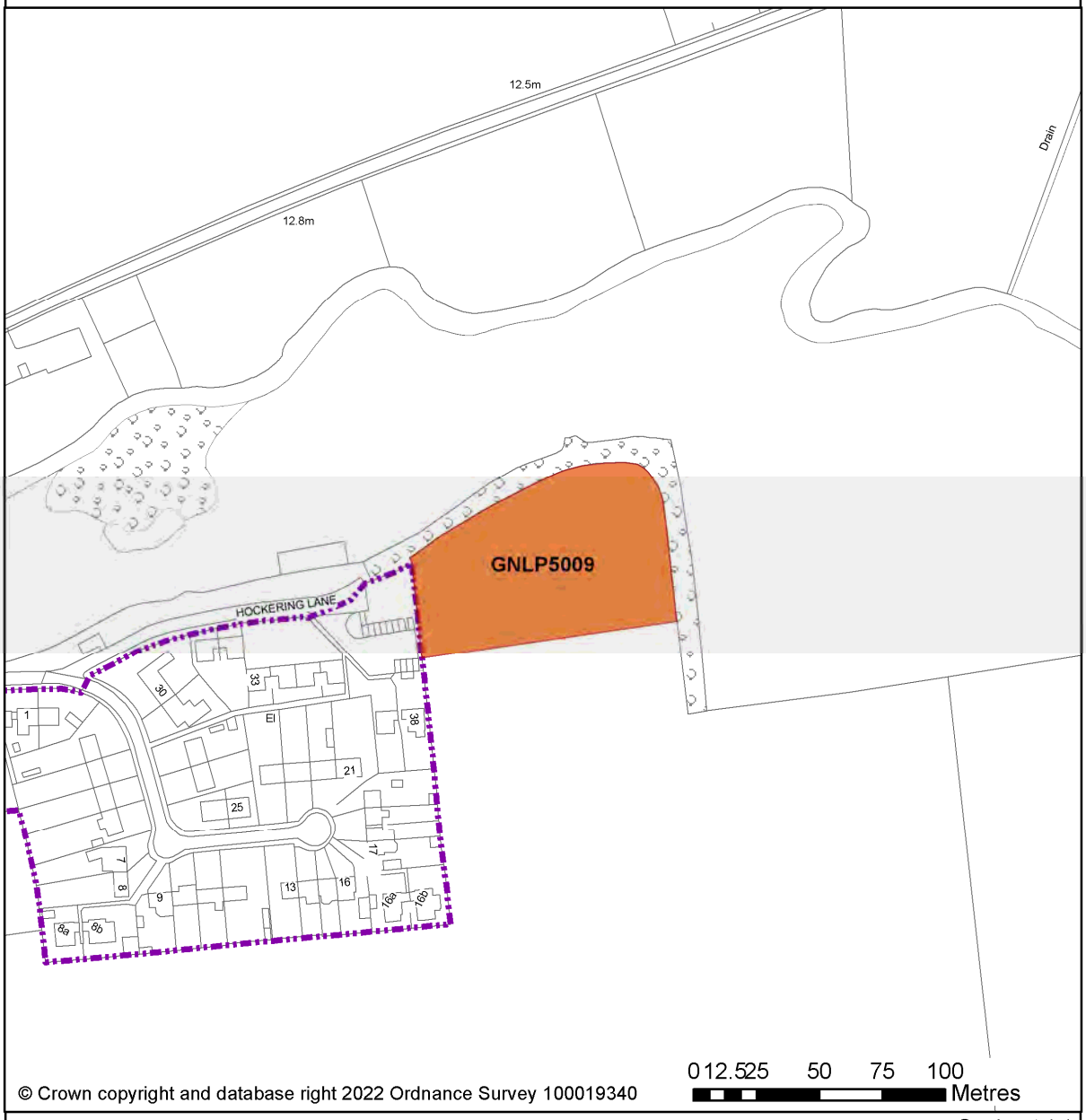
N

Date: 09/06/2022

BAWBURGH

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

SITE REFERENCE: GNLP5009
LOCATION: Land at Hockering Lane, Bawburgh
DESCRIPTION: 6 residential pitches for Gypsies and Travellers
SITE AREA: 0.59 ha



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0 12.5 25 50 75 100 Metres

Key

Proposed Gypsy and Traveller Site

Settlement Boundary

Scale at A4: 1:2,131

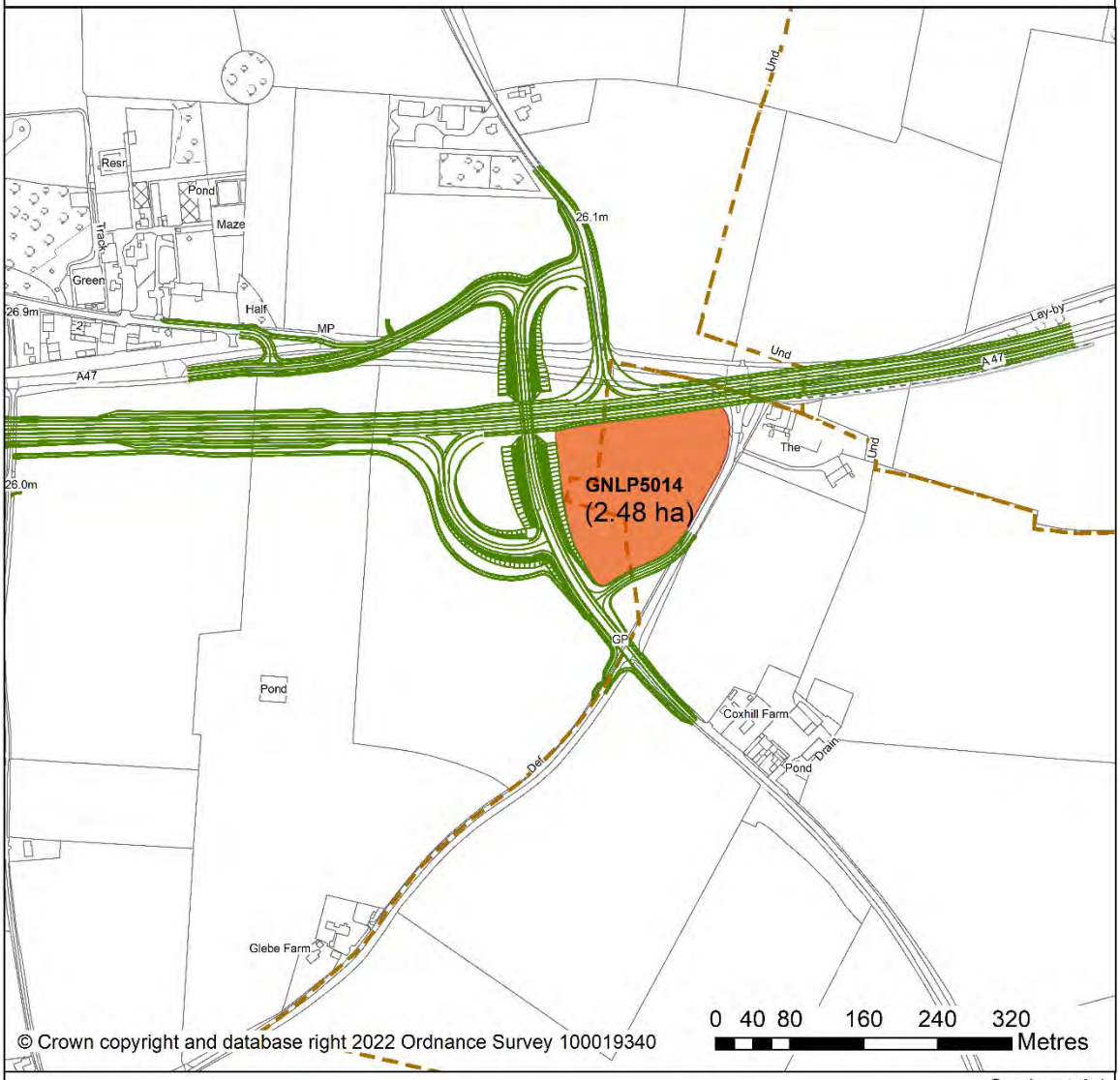
N

Date: 24/03/2022

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

A47 NORTH BURLINGHAM GYPSY AND TRAVELLER SITE BROAD LOCATION

Site Reference: GNLP5014
Location: Broad location south of A47 proposed route



A47 Proposed Route

Parish Boundary

Gypsy and Traveller Broad Location

Scale at A4: 1:6,000

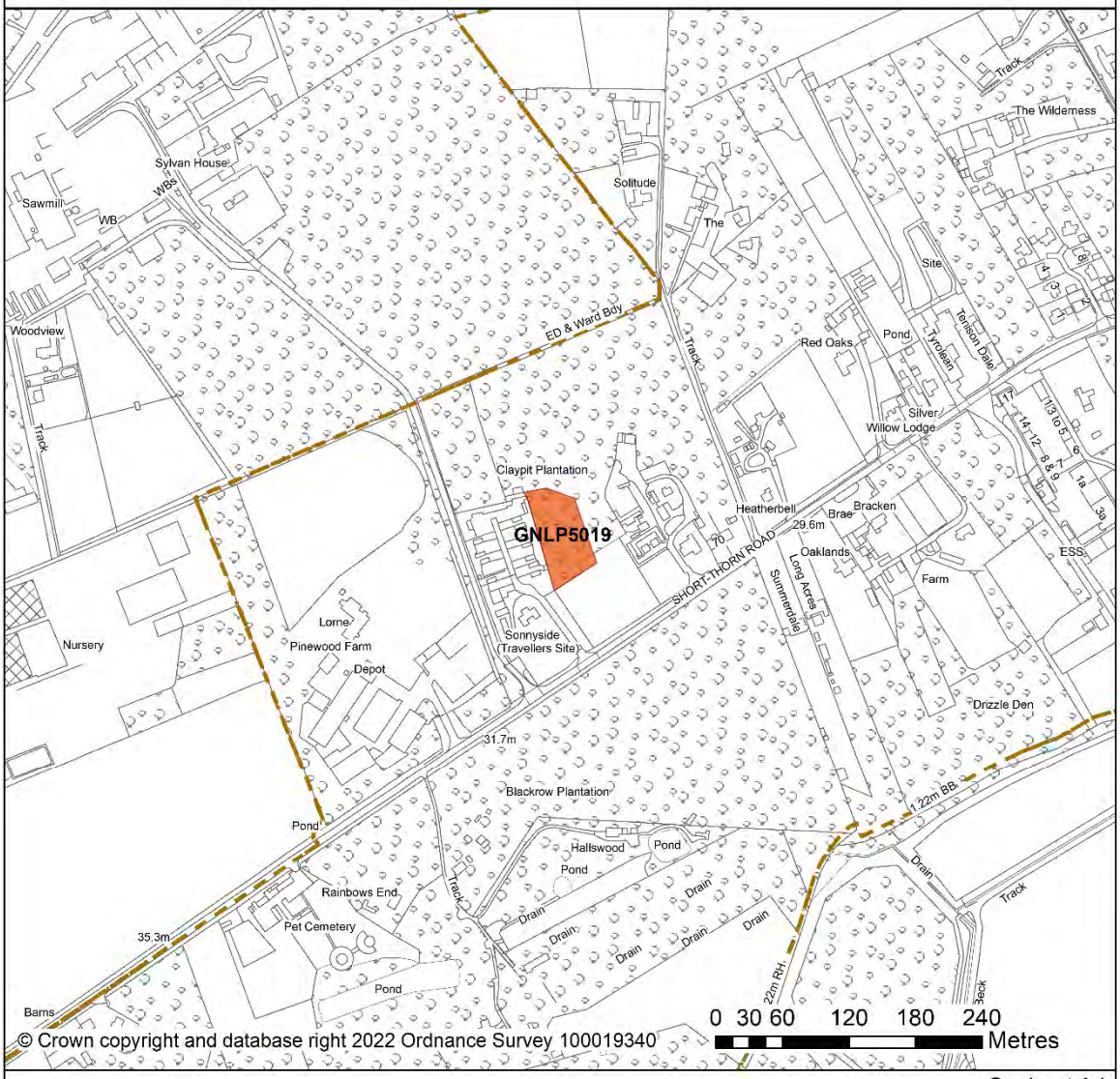
N

Date: 16/11/2022

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

STRATTON STRAWLESS

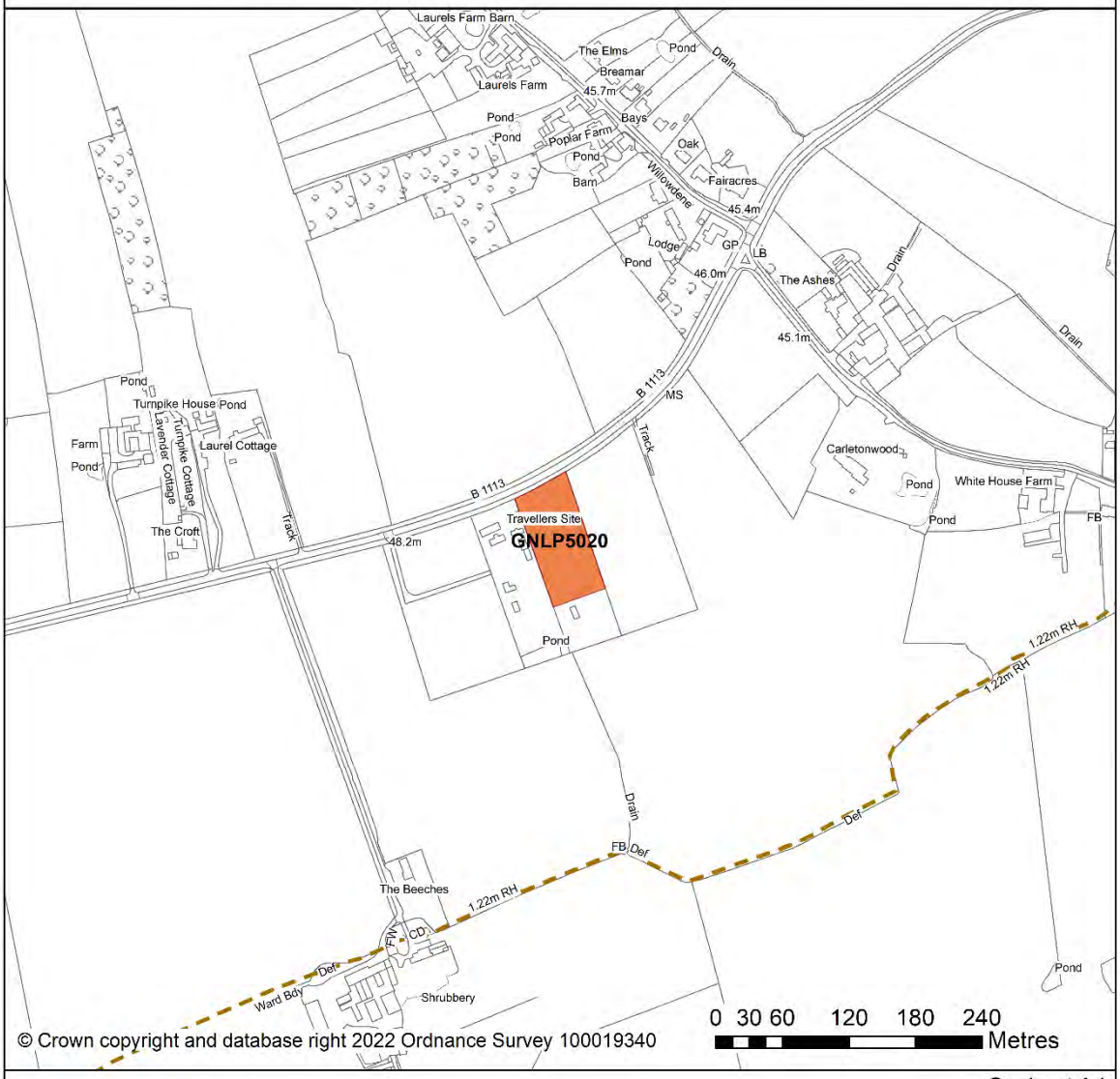
Site Reference: GNLP5019
Location: Land at Woodland Stable, Shortthorn Road, Stratton Strawless
Description: 8 additional residential pitches for Gypsies and Travellers
Area: 0.33 ha



GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

CARLETON RODE

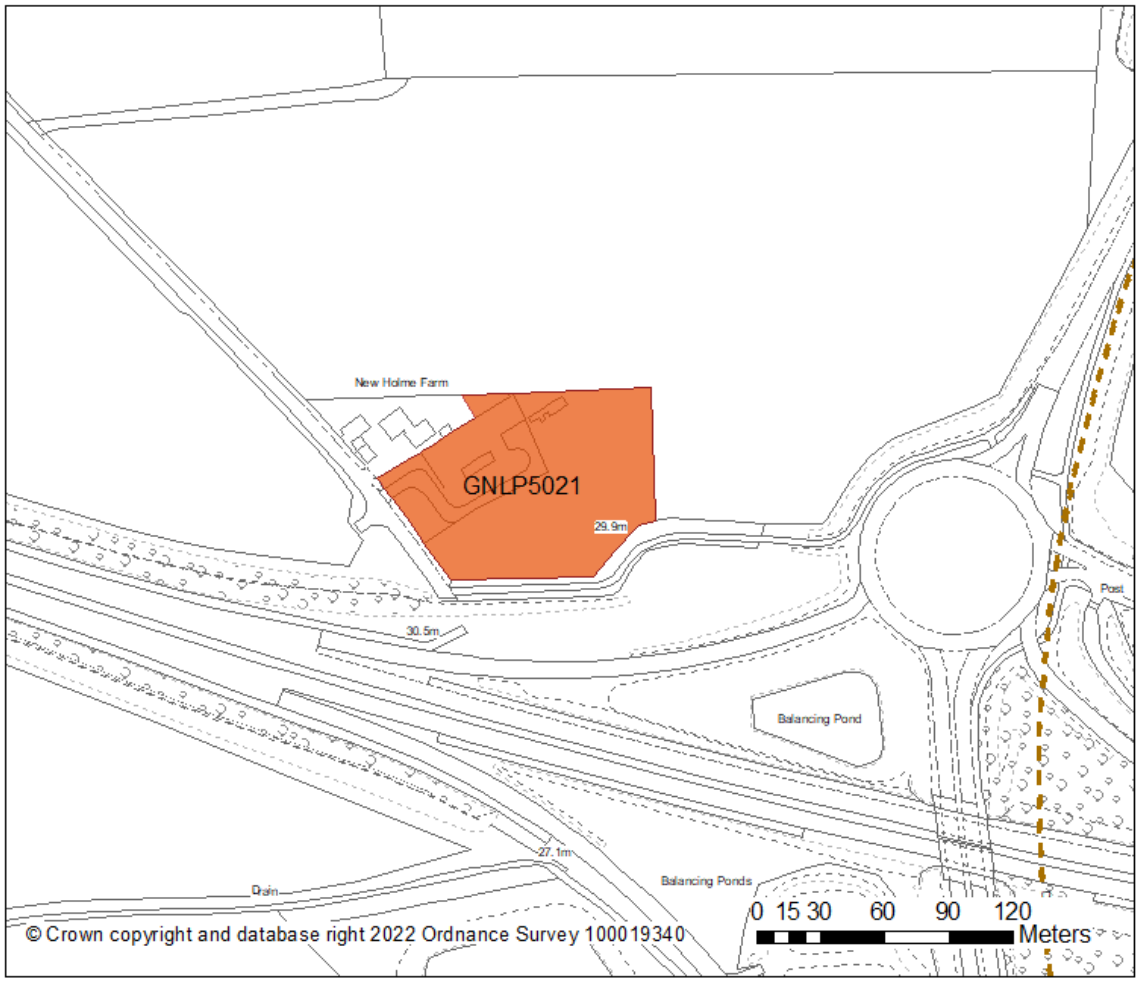
Site Reference: GNLP5020
Location: Land at Romany Meadow, The Turnpike, Carleton Rode
Description: Approximately 6 residential pitches for Gypsies and Travellers
Area: 0.54 ha



GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

LAND AT THE OLD PRODUCE, HOLT ROAD, HORSFORD

Site Reference:	GNLP5021
Location:	Land at the Old Produce Shop, Holt Road, Horsford
Description:	6 additional residential pitches for Gypsies and Travellers
Site Area:	0.9 ha



Scale at A4: 1:2,694

Legend

- Proposed Gypsy and Traveller Site
- Parish Boundary
- Settlement Boundary

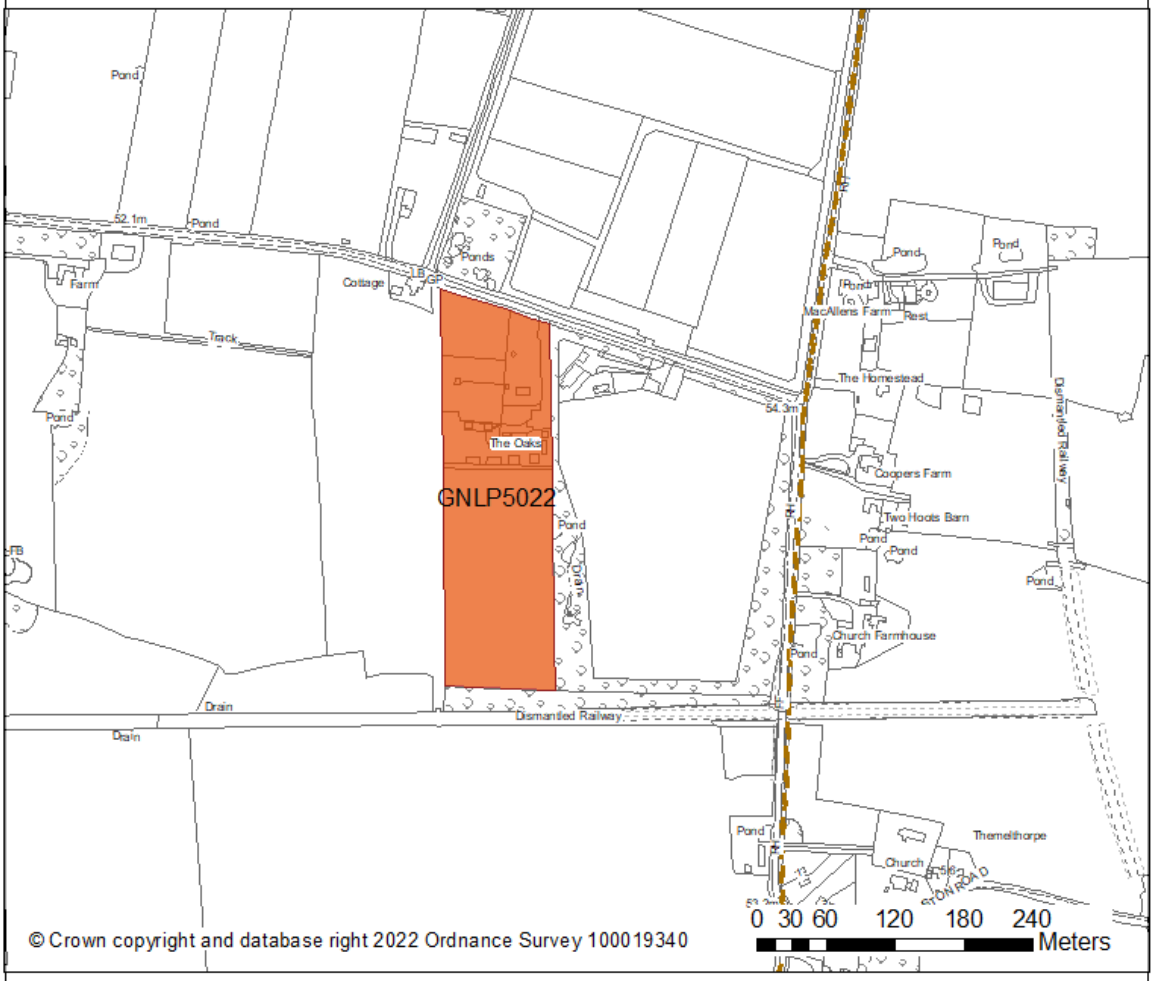
N

Date: 25/11/2022

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

LAND AT THE OAKS, FOULSHAM

Site Reference:	GNLP5022
Location:	Land at the Oaks, Foulsham
Description:	5 additional residential pitches for Gypsies and Travellers
Site Area:	3.1 ha



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Legend

- Proposed Gypsy and Traveller Site
- Parish Boundary
- Settlement Boundary

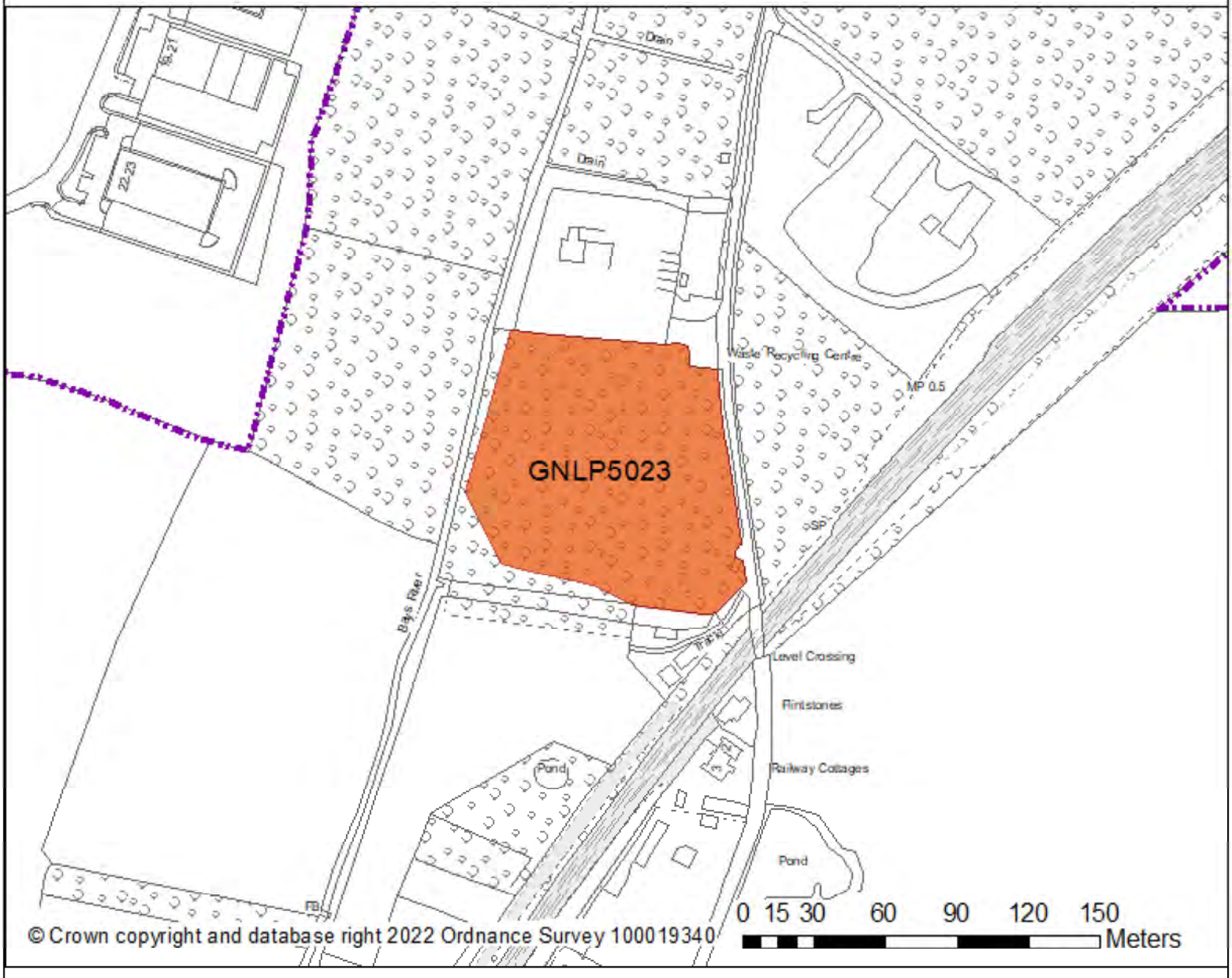
Scale at A4: 1:5,000

N

Date: 28/11/2022

LAND AT STRAYGROUND LANE, WYMONDHAM

Site Reference:	GNLP5023
Location:	Land at Strayground Lane, Wymondham
Description:	Approximately 10 residential pitches for Gypsies and Travellers
Site Area:	1.1 ha



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Legend

- Gypsy_and_Traveller_Broad_Location
- Parish Boundary
- Settlement Boundary

Scale at A4: 1:2,500

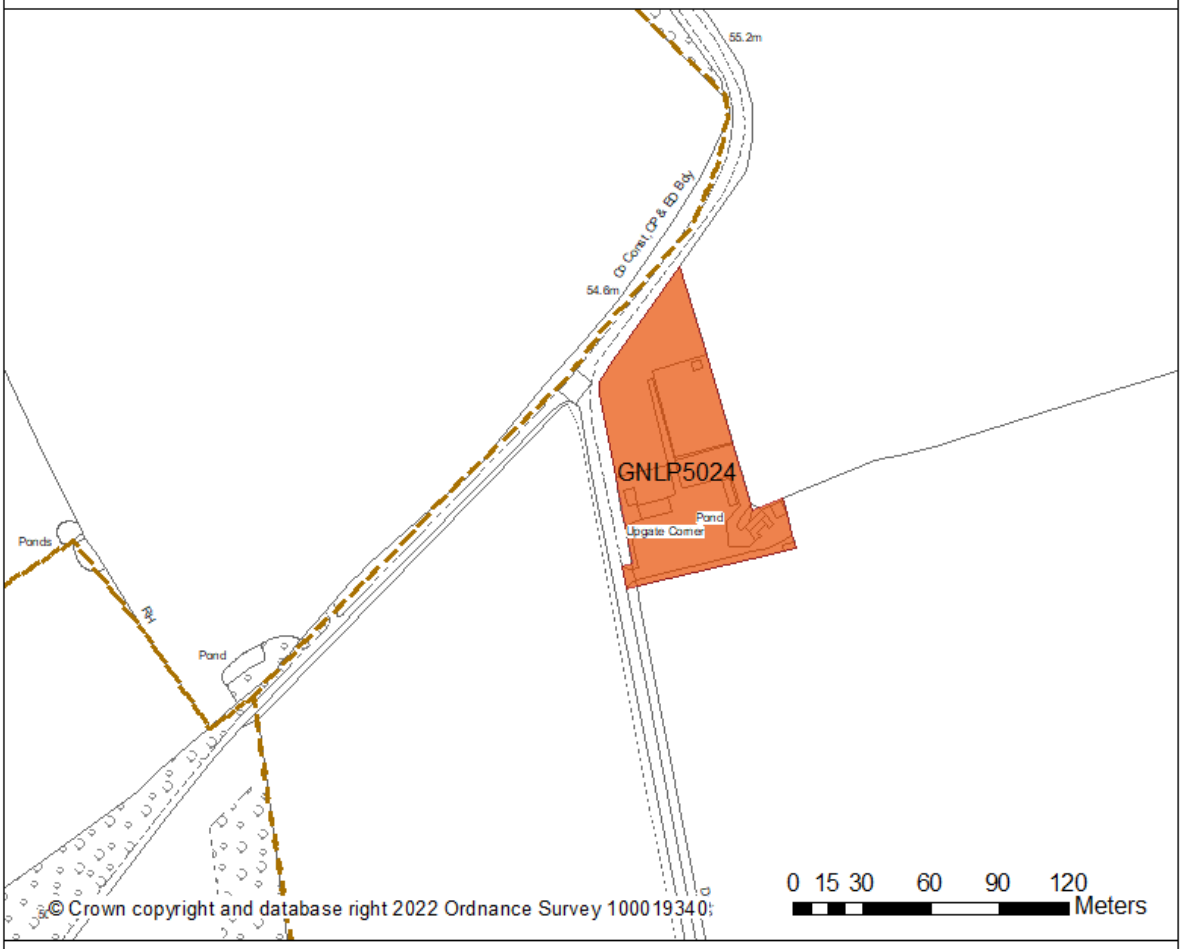
N

Date: 06/12/2022

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

LAND AT UPGATE STREET, CARLETON RODE

Site Reference:	GNLP5024
Location:	Land at Upgate Street, Carleton Rode
Description:	4 additional residential pitches for Gypsies and Travellers
Site Area:	0.62 ha



Legend

- Gypsy and Traveller Broad Location
- Parish Boundary
- Settlement Boundary

Scale at A4: 1:2,500

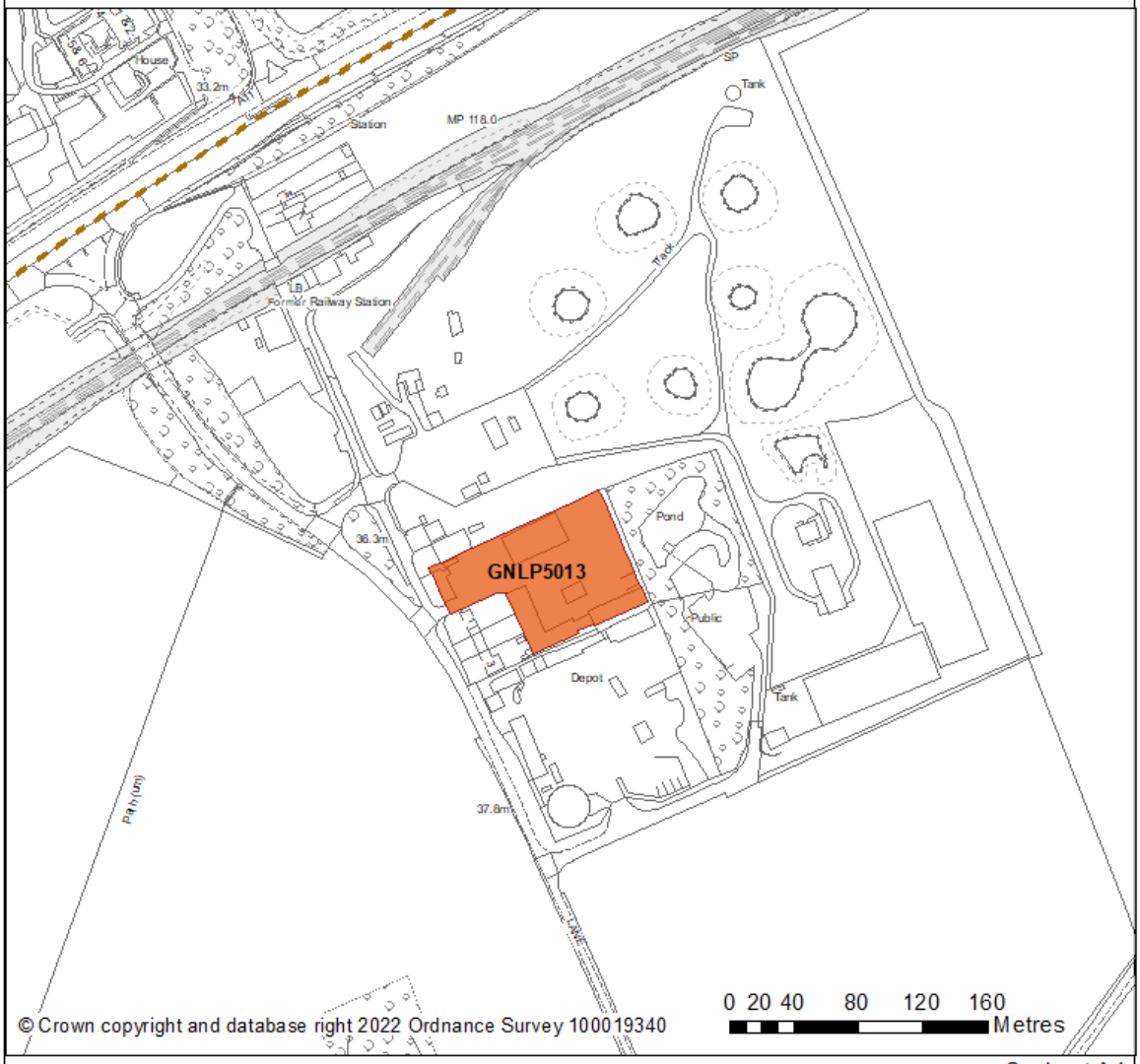
N

Date: 28/11/2022

GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

KETTERINGHAM

Site Reference: GNLP5013
Location: Land at Ketteringham Depot
Description: Reasonable Alternative for approximately 10 residential pitches for Gypsies and Travellers
Area: 0.7 ha



Gypsy and Traveller Site

Parish Boundary

Scale at A4: 1:3,500

N

Date: 30/11/2022

COSTESSEY

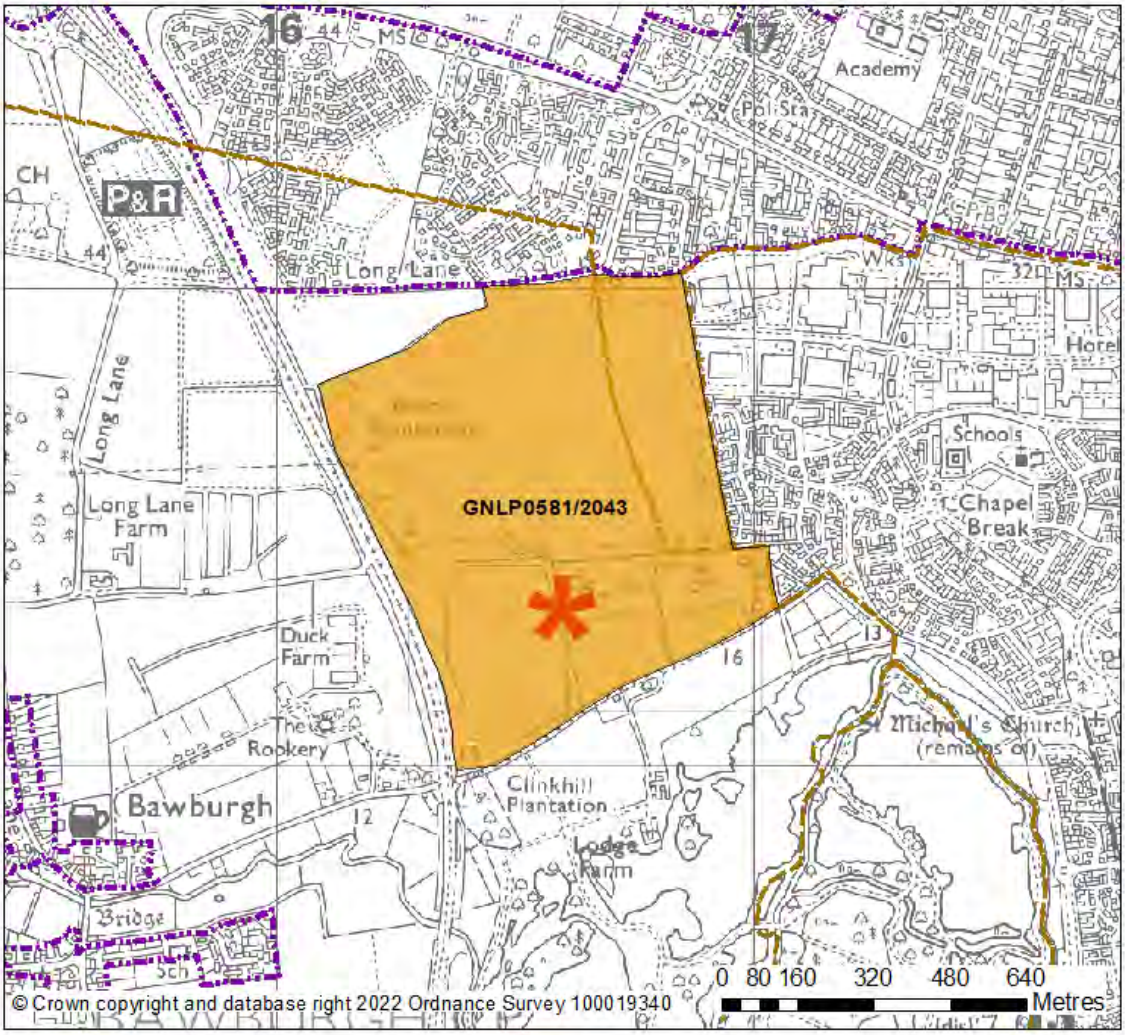
GREATER NORWICH LOCAL PLAN
GYPSY AND TRAVELLER FOCUSED CONSULTATION

Site Reference: GNLP0581/2043

Location: Land off Bawburgh Lane, north of New Road and east of the A47

Description: Should the need for the contingency site be triggered then the option would exist to provide a Gypsy and Traveller site as part of this urban extension of approximately 800 homes. The southern part of the site is the broad location for the Gypsy and Traveller site with vehicular access from New Road.

Site Area: Approximately 1 ha will be located within entire 62 ha site



Contingency Site

Parish Boundary

Settlement Boundary

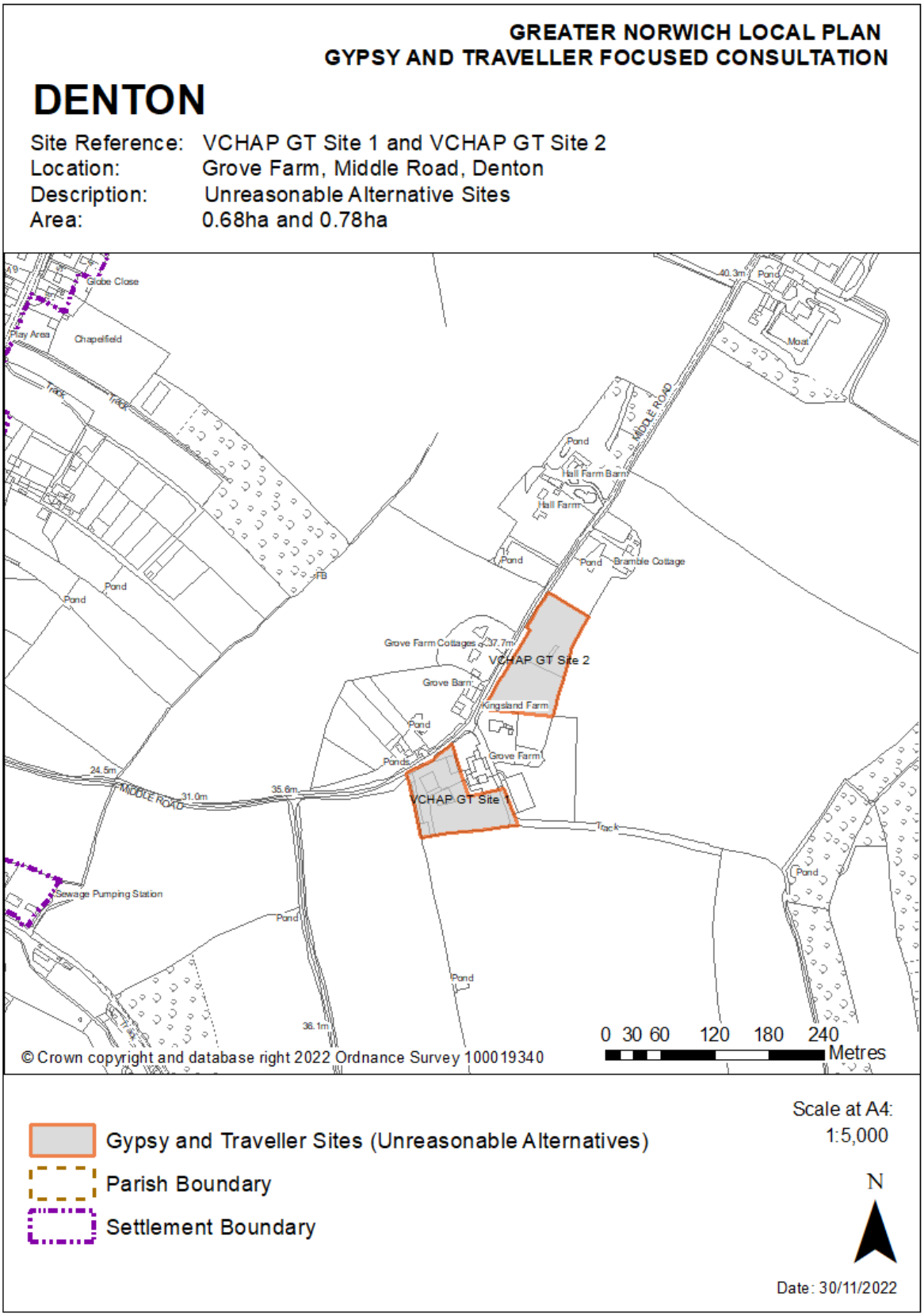
Broad Location of Gypsy and Traveller Site

Scale at A4: 1:12,000

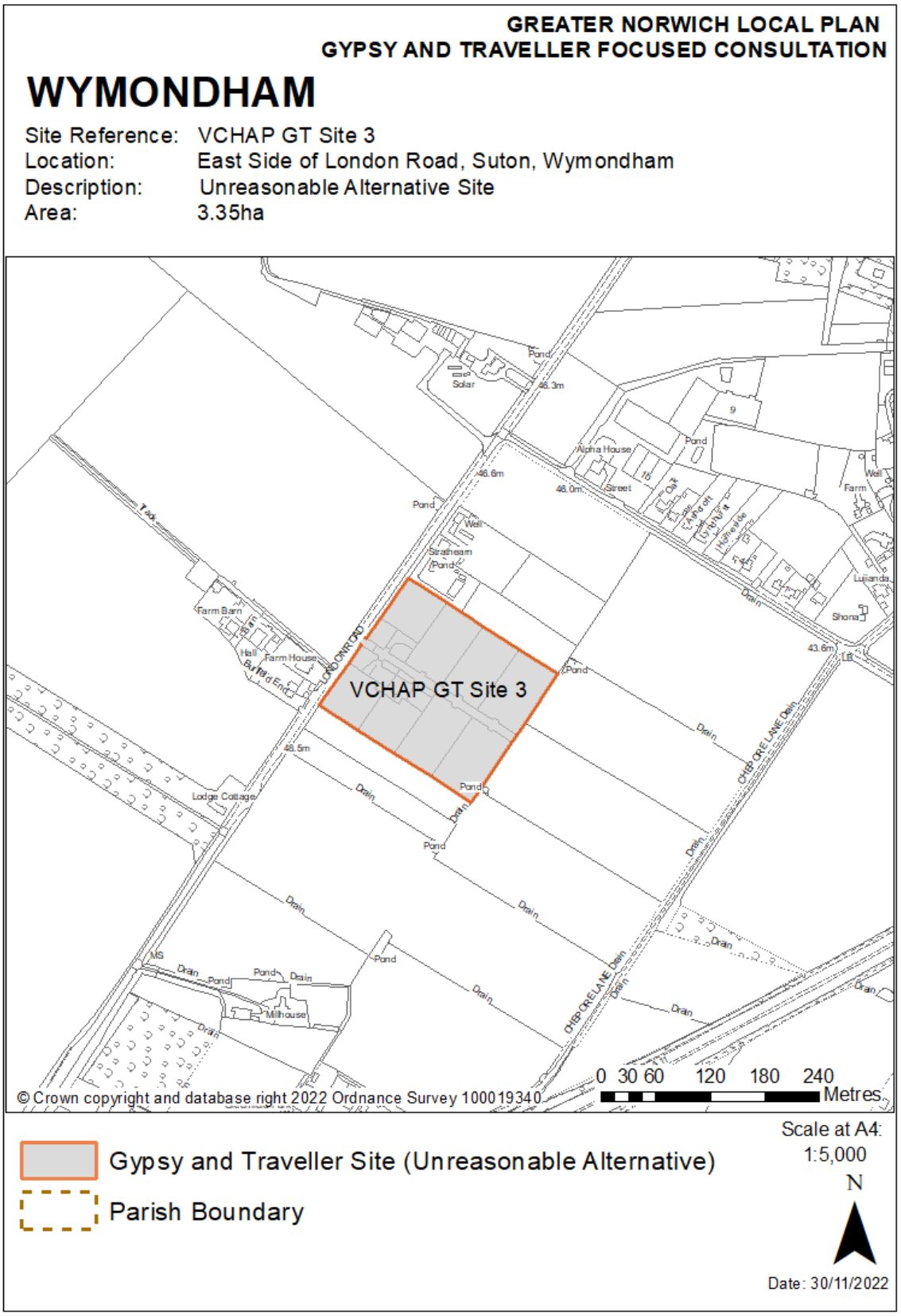
N

Date: 30/11/2022

VCHAP Site 1 and Site 2, Middle Road, Denton



VCHAP Site 3, Land off London Road, Suton, Wymondham



Appendix 3

European protected sites requiring nutrient neutrality strategic solutions

Scale: 1:330,000

Component SSSIs of The Broads SAC

Local Authorities

SSSI subject to nutrient neutrality strategy

Nutrient neutrality SSSI catchment

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NATURAL ENGLAND

Nutrient Budget Calculator Guidance Document

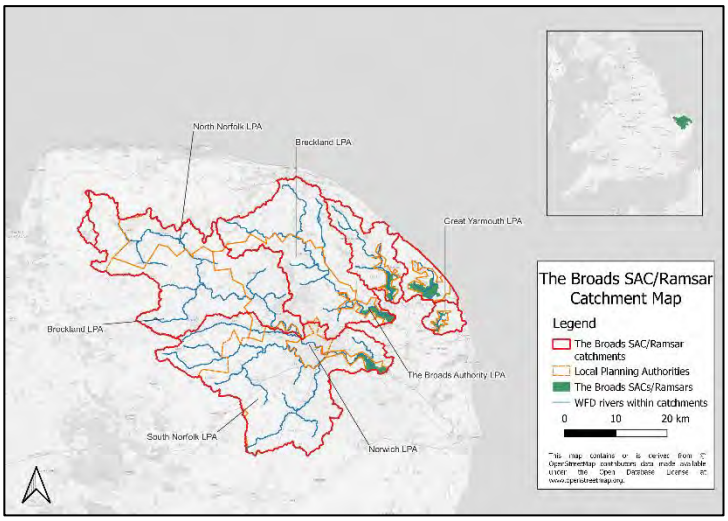
Guidance for completion of a nutrient budget using the nutrient budget calculator tool

Prepared by Ricardo Energy and Environment on behalf of Natural England

Issue 1

The Broads Special Area of Conservation (SAC) and Broadland Ramsar

The Broads SAC and Broadland Ramsar site are Habitats sites with water pollution and eutrophication considered a threat to its condition.



The fens of the Broads, located in East Anglia, contain several examples of naturally nutrient-rich lakes. Although artificial, having been created by peat digging in medieval times, these lakes and the ditches in areas of fen and drained marshlands support relict vegetation of the original Fenland flora, and collectively this site contains one of the richest assemblages of rare and local aquatic species in the UK.

The SAC and Ramsar are designated for several different significant habitats, including habitats made up of a range of important aquatic plant species from groups including stoneworts, pondweeds, water-milfoils and water-lillys. The sites are also a stronghold of little whirlpool ram's-horn snail and Desmoulin's whorl snail in East Anglia. The range of wetlands and associated habitats also provides suitable conditions for otters.

Increased levels of nitrogen and phosphorus entering aquatic environments via surface water and groundwater can severely threaten these sensitive habitats and species within the sites. The elevated levels of nutrients can cause eutrophication, leading to algal blooms which disrupt normal ecosystem function and cause major changes in the aquatic community. These algal blooms can result in reduced levels of oxygen within the water, which in turn can lead to the death of many aquatic organisms including invertebrates and fish.

The habitats and species within the site that result in designation as a SAC and Ramsar site are referred to as 'qualifying features.' Not all of these qualifying features will be sensitive to changes in nutrients within the sites. When completing an HRA involving nutrient neutrality, the Competent Authority (normally Local Planning Authority for developments) must identify and screen out qualifying features that are not sensitive to nutrients via a Habitats Regulations Assessment. Developers will be asked to submit information to support this process.

More detailed information on the qualifying features of the SAC and Ramsar and details of water quality data highlighting the current nutrient problems in the site are available in the Natural England The Broads SAC and Broadland Ramsar site evidence summary.

The requirement for Nutrient Neutrality

Special Areas of Conservation (SAC), Special Protection Areas (SPA), and Ramsar sites are some of the most important areas for wildlife in the United Kingdom. They are internationally important for their habitats and wildlife and are protected under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations). At some of these sites, there are high levels of nitrogen and phosphorus input to the protected water environment with sound evidence that these nutrients are causing eutrophication at these designated sites. These nutrient inputs currently mostly come either from agricultural sources or from wastewater from existing housing and other development. The resulting effects on ecology from an excessive presence of nutrients are impacting on protected habitats and species.

There is uncertainty as to whether new growth will further deteriorate designated sites, and/or make them appreciably more difficult to restore. The potential for future housing developments to exacerbate these impacts creates a risk to their potential future conservation status.

One way to address this uncertainty is for new development to achieve nutrient neutrality. Nutrient neutrality is a means of ensuring that development does not add to existing nutrient burdens and this provides certainty that the whole of the scheme is deliverable in line with the requirements of the Habitats Regulations.

Key Principles

The principles underpinning Habitats Regulations Assessments are well established[1]. At the screening stage, plans and projects should only be granted consent where it is possible to exclude, on the basis of objective information, that the plan or project will have significant effects on the sites concerned[2]. Where it is not possible to rule out likely significant effects, plans and projects should be subject to an appropriate assessment. That appropriate assessment must contain complete, precise and definitive findings which are capable of removing all reasonable scientific doubt as to the absence of adverse effects on the integrity of the site[3].

Natural England has been reviewing the available evidence on Habitats sites which are in unfavourable condition due to elevated nutrient levels. Where plans or projects will contribute additional nutrients to Habitats sites which are close to or already in unfavourable condition for nutrients, then a robust approach to the Habitats Regulations Assessment (HRA) of the effects of plans and projects is required.

Where sites are close to or already in unfavourable condition for nutrients, it may be difficult to grant consent for new plans and projects that will increase nutrient levels at the Habitats site. Nutrient neutrality provides a means of effectively mitigating the adverse effects associated with increased nutrients from new plans and projects, by counter-balancing any additional nutrient inputs to ensure that there is no net change in the amount of nutrients reaching the features which led to a Habitats site being designated.

Where new residential development is proposed, the additional nutrient load from the increase in wastewater and/or the change in the land use of the development land created by a new residential development can create an impact pathway for potential adverse effects on Habitats sites that are already suffering from problems related to nutrient loading. This impact pathway is shown diagrammatically in Figure 1. HRAs of new residential developments therefore need to consider whether nutrient loading will result in 'Likely Significant Effects' (LSE) on a Habitats site. If an HRA cannot exclude a LSE due to nutrient loading, the Appropriate Assessment (AA) will need to consider whether this nutrient load needs to be mitigated in order to remove adverse effects on the Habitats site.

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[1] See, amongst others Case C-127/02 *Waddenvereniging and Vogelsbeschermingvereniging* (Waddenzee); *R (Champion) v North Norfolk DC* [2015] EKSC 52 (Champion); C-323/17 *People Over Wind, Peter Sweetman v Coillte Teoranta* (People Over Wind); C-461/17 *Brian Holohan and Others v An Bord Pleanála* (Holohan); Joined Cases C-293/17 and C-294/17 *Coöperatie Mobilisation for the Environment UA and Others v College van gedeputeerde staten van Limburg and Other* (the Dutch Nitrogen cases);

[2] Case C-127/02 Waddenvereniging and Vogelsbeschermingvereniging (Waddenzee)

[3] Case 164/17 Grace & Sweetman v An Bord Pleanála (Grace & Sweetman)

For those developments that wish to pursue neutrality, Natural England advises that a nutrient budget is calculated for new developments that have the potential to result in increases of nitrogen/phosphorus entering the international sites. A nutrient budget calculated according to this methodology and demonstrating nutrient neutrality is, in our view, able to provide sufficient and reasonable certainty that the development does not adversely affect the integrity, by means of impacts from nutrients, on the relevant internationally designated sites. This approach must be tested through the AA stage of the HRA. The information provided by the applicant on the nutrient budget and any mitigation proposed will be used by the local planning authority, as competent authority, to make an AA of the implications of the plan or project on the Habitats sites in question.

The nutrient neutrality calculation includes key inputs and assumptions that are based on the best available scientific evidence and research. It has been developed as a pragmatic tool. However, for each input there is a degree of uncertainty. For example, there is uncertainty associated with predicting occupancy levels and water use for each household in perpetuity. Also, identifying current land / farm types and the associated nutrient inputs is based on best available evidence, research and professional judgement and is again subject to a degree of uncertainty.

It is our advice to local planning authorities to take a precautionary approach in line with existing legislation and case law when addressing uncertainty and calculating nutrient budgets. This should be achieved by ensuring nutrient budget calculations apply precautionary rates to variables and adding a buffer to the Total Nitrogen/Total Phosphorus figure calculated for developments. A precautionary approach to the calculations and solutions helps the local planning authority and applicants to demonstrate the certainty needed for their assessments.

By applying the nutrient neutrality methodology, with the buffer, to new development, the competent authority may be satisfied that, while margins of error will inevitably vary for each development, this approach will ensure that new development in combination will avoid significant increases of nitrogen load from entering the internationally designated sites.[4]

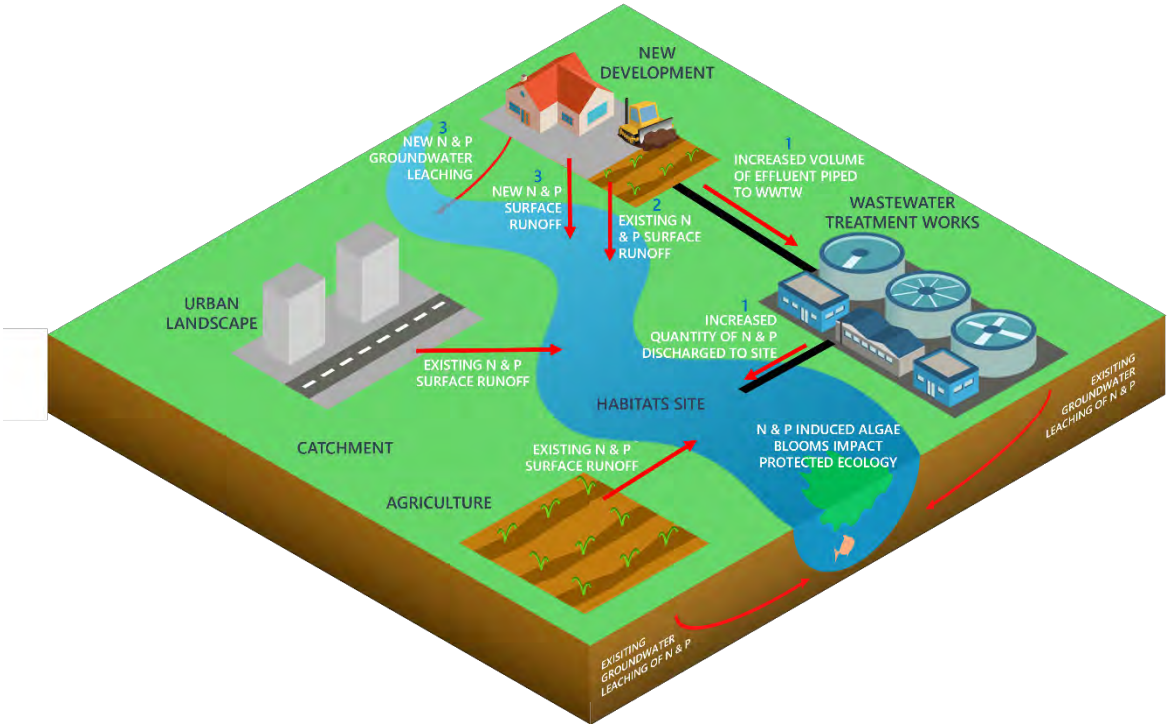
A HRA must be capable of removing all reasonable scientific doubt as to the absence of adverse effects on a Habitats site. Absolute certainty is not required, but the methodology used to evaluate potential adverse effects (and the measures intended to mitigate them) must effectively address any reasonable scientific doubt to achieve the required degree of certainty.

The first step in an AA that is applying nutrient neutrality is to understand whether a development will cause additional nutrient inputs to the Broads SAC and Broadland Ramsar site. This requires calculation of the amount of nutrients a new residential development will create, otherwise known as a nutrient budget.

If a nutrient budget shows that a new development will increase the nutrient input to the Broads SAC and Broadland Ramsar site and it is not possible to conclude no adverse effect on site integrity alone or in combination, then this is the amount of nutrients that require mitigating on an annual basis to achieve nutrient neutrality and therefore enable a conclusion of no adverse effect on site integrity to be reached.

[4] This approach was expressly endorsed in *R (Wyatt) v Fareham BC* [2021] EWHC 1434 (Admin)

Figure 1: Diagram demonstrating the potential nutrient impact pathways from a new development to a Habitats site. An increase in nitrogen and phosphorus availability in aquatic ecosystems can lead to various problems, such as algae blooms, which can have detrimental impacts on the ecology of a Habitats site.



What is this guidance for?

This guidance document accompanies the Broads SAC and Broadland Ramsar site nutrient budget calculator. The nutrient budget calculator is used to calculate the change in nutrient input from a new residential development to the Broads SAC and Broadland Ramsar site. The calculator can be used to inform an AA which is looking to apply nutrient neutrality to show whether a new development will require nutrient mitigation and if so, the amount of nitrogen and phosphorus loading that requires counterbalancing through mitigation measures to enable a conclusion of no adverse effect on site integrity, alone or in combination.

The guidance document contains the following:

- Step-by-step instructions on how to collect the specific data required as inputs to the tool.
- Instructions on how to use the tool.

Who is the guidance for?

This guidance is for anyone who needs to complete a nutrient budget calculation to support an AA of residential development in the Broads SAC and Broadland Ramsar site catchment. The tool is primarily aimed at developers who need to complete a nutrient budget calculation to support a planning application and Local Planning Authorities who need to understand the mitigation requirements for future development or assess planning applications. It could also be used by communities or environmental groups wanting to understand the impacts of a local development on the nutrient inputs to the Broads SAC and Broadland Ramsar site.

Summary of how the calculator works.

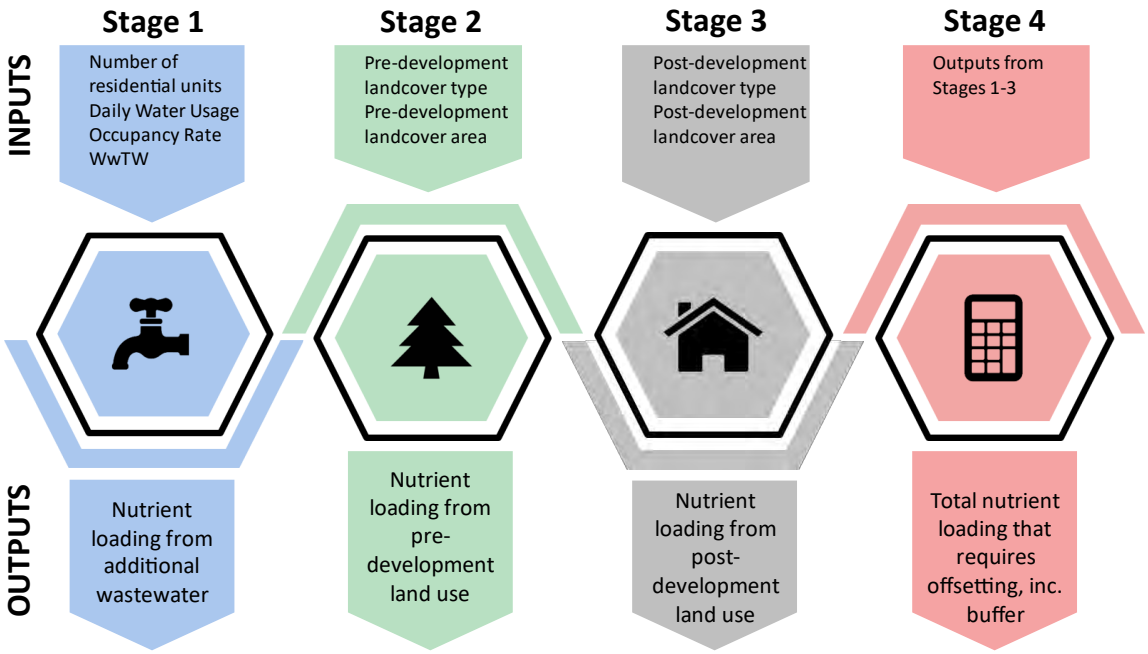
Overview

The nutrient budget calculator requires a set of inputs in order to calculate a new development's nutrient budget. The calculations are completed in four stages:

1. Calculate the increase in nutrient loading that comes from a development's wastewater.
2. Calculate the pre-existing nutrient load from current land use on the development site.
3. Calculate the future nutrient load from land use on the development site post-development.
4. Calculate the net change in nutrient loading from the development to the Broads SAC and Broadland Ramsar site with the addition of a buffer. The net change in nutrient loading + the buffer is the nutrient budget.

These key inputs and outputs for each stage can are shown schematically in Figure 2.

Figure 2: Schematic showing the key inputs and outputs associated with each stage of the nutrient budget calculation methodology



Note: the values that come pre-entered in this tool have been chosen based on research to select inputs that meet the HRA tests of beyond reasonable scientific doubt, best available evidence, in perpetuity and were chosen in accordance with the precautionary principle. It is highly unadvisable to edit the values in this tool without a sufficient evidence base to justify any changes.

Data Collection and preparation

The nutrient budget calculator requires a set of inputs as shown in Figure 2. This section does not provide instructions on how to gather development specific information, such as the number of properties being constructed, as this should be known by the developer and should be detailed in the planning application. The subsections below provide guidance on how to identify certain inputs that are needed to complete the calculations for each stage of the nutrient budget calculations. The information required is available from free to access data sources[5]. Most of the required inputs are for factors that are specific to the location of a development site or the hydrological catchment of the Broads SAC and Broadland Ramsar site.

The instructions below are divided by the stage where the data will be required. We advise that you collect and note down this data before starting to input information into each stage of the nutrient budget calculator.

Stage 2 & 3: Instructions for finding the Operational Catchment that the development is located within

- Go to this link: http://environment.data.gov.uk/catchment-planning/
- Search the location by place name, postcode etc. This will give a high-level view of the area. Use the zoom feature to find the exact location of the development.
- Click on the light blue area on the map in which the development is located. This will bring the user to the Operational Catchment page
- Make a note of the name of the Operational Catchment and select it from the dropdown list in the 'Catchment' cell when you get to this part of the calculator tool.

Stage 2: Instructions for finding the soil drainage type associated with the predominant soil type within the development site

- Go to this link: http://www.landis.org.uk/soilscapes/#
- Find your development site location on the map by using the search bar on the right side of the map in the 'Search' tab. Searching a location should generate a pop-up window in which you can view the soil information by clicking 'View soil information'. If this is not an option then click on the relevant soil type on the map and click on the 'Soil information' tab on the right-hand side of the map, below the 'Search' tab.
- The 'Soil drainage type' value can be found in the 'Soil information' under the title 'Drainage:'
- Make a note of this soil type and select the relevant soil drainage type from the drop-down list in the 'Soil drainage type' cell when you get to this part of the calculator tool.

Stage 2: Instructions for finding the annual average rainfall that the development site will receive

- Go to this link: https://nrfa.ceh.ac.uk/data/station/spatial/34002
- This link will bring the user to the Tas at Shotesham flow gauge catchment information page.
- Click on the dropdown list next to the title 'Select spatial data type to view:' on the left of the map and select 'Rainfall'.
- Select the Legend tab.
- Zoom in on the map to find the location of the development and find the corresponding rainfall range from the Legend. Note that you cannot search this map using location information and will need to 'surf' around the map to find your development site location.
- Make a note of the relevant rainfall band for your site and use it to select this rainfall band from the drop-down list in the 'Average annual rainfall' cell when you get to this part of the calculator tool.

[5] Correct at the time of writing. These data sources are available from websites that currently have government funding but it should be noted that these datasets may become unavailable if funding is removed.

Stage 2: Instructions for finding out whether the development is in a Nitrate Vulnerable Zone (NVZ)

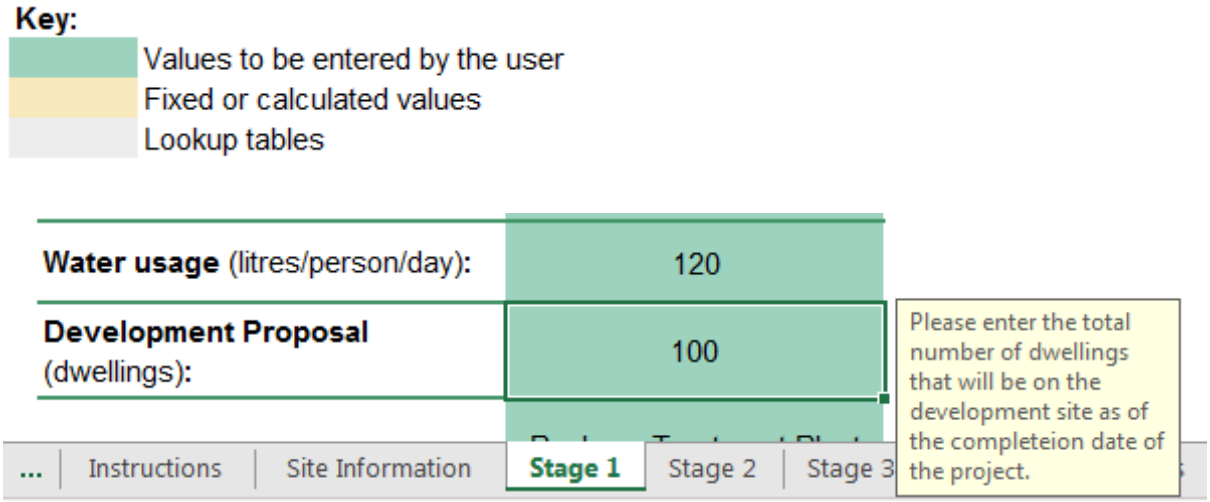
- Go to this link http://mapapps2.bgs.ac.uk/ukso/home.html?layers=NVZEng
- Enter the location of the development site in the search bar.
- Once the area has been located, click on the map where the development is located to find out if it is within an NVZ.
- Make a note of this information. It will be needed to select 'Yes' or 'No' from the 'Within Nitrate Vulnerable Zone (NVZ)' cell when you get to this part of the calculator tool.

Note: some of the values you select above will also be used in the Stage 3 calculations, however you only need to add the above details to the table in Stage 2 of the calculator and the required values for stage 3 will be carried through automatically.

How to use the calculator:

General tips

- The key below shows the colour coding used to highlight which cells need to be completed.
- When a cell is selected, instructions on how to fill out the cell that is selected are shown.
- Some cells will have values pre-populated, like the 'Water usage' input. The instructions for each cell will detail if an alternative value can be used.
- It is advisable to retain a default copy of this calculator tool workbook which has not had any development details added. "Save as" a new copy each time you calculate a budget for a new development in case any of the default values in the in the workbook get overwritten and are needed again.



Stage 1: calculate the new nutrient load associated with the additional wastewater

In this section the user will need to enter:

- The date of first occupancy. *This is because some wastewater treatment works may be due an upgrade in 2025 that will change the nitrogen or phosphorus output from this works, which will in turn change the output from this stage of the calculations. If this is the case, it will be apparent in the calculated values if there is an upgrade to a treatment works that affects the nutrient budget.*

- The average occupancy rate of the development will need to be entered in people per dwelling for residential dwellings or units for other types of overnight accommodation which would result in an increase in overnight accommodation. The default setting for residential dwellings is the national occupancy rate of 2.4 people per dwelling. **Only change this value if there is sufficient evidence that a different occupancy rate is appropriate** (see Occupancy Rate Guidance section below for when a local or regional occupancy rate is acceptable).

- The number of dwellings / units[6] that will be within the development at the time of completion.

- The wastewater treatment works that the development will connect to. If required this information can be obtained from the sewerage undertaker for the development site. If it is not feasible to connect to mains sewerage and a septic tank (ST) or package treatment plant (PTP) is being used, please select this option. Please be aware that if the total nitrogen (TN) or total phosphorus (TP) final effluent concentrations (in mg/l) are specified by the manufacturer, please select 'Septic Tank user defined' or 'Package Treatment Plant user defined' and enter the specified value in the cell where prompted. If you do not have a TP or TN value provided by the manufacturer, select the 'Septic Tank default' or 'Package Treatment Plant default' option and a value will be provided automatically.

Occupancy Rate Guidance:

As set out in the guidance below, the Local Planning Authority/Competent Authority will need to ensure that the occupancy rate is appropriate to development within their Authority area. **It is therefore recommended that the occupancy rate is agreed with the Local Planning Authority before completing the nutrient budget calculation.**

Competent authorities must satisfy themselves that the residents per dwelling/unit value used in this step of the calculation reflects local conditions in their area. The residents per dwelling value can be derived from national data providing it reflects local conditions. However, if national data does not yield a residents per dwelling/unit value that reflects local occupancy levels then locally relevant data should be used instead. Whichever figure is used, it is important to ensure it is sufficiently robust and appropriate for the project being assessed. **It is therefore recommended that project level Appropriate Assessments specifically include justification for why the competent authority has decided upon the occupancy rate that has been used.**

Further guidance is provided below.

National occupancy data

When using national occupancy data, the Office of National Statistics (ONS) national average value for the number of residents per dwelling of 2.4 is recommended. This value is derived from 2011 census data and is subject to change when the 2021 Census becomes available. This value can be used if the Local Planning Authority is satisfied that:

- It is appropriate for the level and type of housing development that is expected to come forward in the Local Planning Authority's area (a strategic assessment should be made of the development anticipated to come forward over the Local Plan period to ensure the use of average figures will not under/overestimate the level of impact)

- It corresponds to the local average in the area (it is not likely to overestimate or underestimate occupancy)

[6] The term 'dwellings' has a specific legal meaning derived from the use classes order. To ensure that all relevant forms of development which would result in an increase in overnight accommodation such as hotel rooms, short term holiday lets etc are considered in the HRA process the term units is used

- It is based on data that is robust and doesn't underestimate the level of impact over time.

It may not be appropriate to use the national average occupancy rate for development types which are not included in the ONS data, such as student accommodation or houses in multiple occupation. For such developments, the Local Planning Authority should specify an appropriate occupancy rate in the project level Appropriate Assessment and explain how this figure was derived.

Locally relevant occupancy data

If the national average occupancy rate does not correspond with local conditions, then a locally relevant average residents per dwelling value may be more appropriate. If a Local Planning Authority decides to use a locally relevant value, that value needs to be supported by robust and sufficient evidence which should be included in the project level Appropriate Assessment. Key sources of evidence include:

- The average occupancy rate from the census for the relevant local administrative area, e.g. the county.

- The average occupation figures used by the Local Planning Authority to calculate population growth due to Local Plan development.

- The average occupation figures used by the local water company to plan for population growth and the impact on water resources and sewage treatment.

A local / regional average occupancy rate can be used provided that it is from a robust source which can show trends over a protracted period of time– such as from ONS derived data or from the annual English Housing Survey. Figures derived from data collected over short periods of time will not be acceptable as short-term data is unlikely to provide the required degree of certainty. The Local Planning Authority should ensure that any trend in occupancy rates or estimates of the average number of persons per household used will continue for perpetuity and would not underestimate the level of impact over time. A local / regional average occupancy rate would therefore need to be based on figures over at least a 5-year period[7].

Local Planning Authorities will also need to satisfy themselves that a locally derived occupancy figure is appropriate for the level and type of housing development that is expected (a strategic assessment should be made of the development anticipated to come forward over the Local Plan period to ensure the use of average figures will not under/overestimate the level of impact).

Occupancy rates based on dwelling type

Should the nature or scale of development associated with a particular project proposal suggest that the use of an average occupancy rate is not appropriate, then the Local Planning Authority may decide to adopt an occupancy rate based on the dwelling types proposed for that particular project, provided it meets the criteria outlined above. This may be appropriate where a project proposer seeks consent for a development comprising certain dwelling types (e.g. flats and small 1 and 2 bed dwellings). If the Local Planning Authority decides to adopt a local approach based on determining occupancy rate by dwelling type, that approach should be used for all planning applications, rather than reverting back to the use of an average occupancy rate. This will ensure that the Local Planning Authority doesn't inadvertently underestimate total occupancy levels (and consequently water quality impacts) across its area by applying a lower residents per dwelling/unit value for developments comprising smaller units but failing to adopt a higher residents per dwelling/unit value for developments comprising larger units or a mix of units.

[7] The figure of 5 years has been chosen as the minimum period of time over which occupancy rates can be calculated from as local plans and WRMPs are reviewed every 5 years, so represents a long enough period of time to capture any trends or changes.

Consistency in applying occupancy rates

The same occupancy rate should be used where there are several different impacts on Habitat sites which require strategic mitigation. The strategic approaches developed with local planning authorities to deal with in combination impacts on international sites elsewhere typically calculate mitigation requirements and contribution requirements based on current national average occupancy rates. Local Planning Authorities may decide to use a locally derived average occupancy rate instead, but this local occupancy rate must be used consistently across each type of impact and each Habitats site affected. Local Planning Authorities should not use different occupancy rates in their HRAs for the same dwelling types / size of units. Whilst the impacts will be different, occupancy rates will have been used to estimate the scale of impact and subsequently the scale of mitigation required on the protected sites. The types of impact will typically last in perpetuity. Care is therefore needed to ensure the adoption of an alternative occupancy rate based on an assessment of net population additions to a locality for nutrient budgeting does not undermine other existing strategic approaches, particularly where there are overlapping impacts within the locality.

Note: When 2021 Census data is available, the 2.4 value will be updated.

Note: if an ST or PTP is being used then a comprehensive maintenance regime is required as part of the application process. Please consult your Local Planning Authority for further advice on how to specify this maintenance regime and demonstrate that it is appropriately secured. If the ST or PTP which is being used has phosphate stripping capabilities, chemical dosing may be required. If chemical dosing is required, a robust management plan that details how chemicals are stored, the dilution rates, dosing frequencies, that any chemicals used will not have an environmental impact etc. must also accompany the planning application. PTPs with chemical dosing may not be appropriate in all cases.

Stage 2 - calculate the annual nutrient load from existing (pre-development) land use on the development site

In this section some environmental information about the development will need to be entered as well as the type and area of landcover that is being developed. The environmental information required is described above.

Only the types and areas of land that are being altered by the development should be entered. For example, if two hectares of agricultural land within a ten-hectare development site are being retained in the same agricultural use, this area should not be included in the calculations.

In the 'Existing land use type(s)' column of the main table in Stage 2 of the calculator, each cell has drop-down list of land use types. This list contains seven agricultural land cover types to choose from and eight different non-agricultural land cover types that may be present on a pre-development site. Please find out what land use types are within the development before completing this tool. If there is a land use within the development area that is not in the list, please select the most similar land use type. Table 1 provides a description of the different land use types available within the calculator tool.

Table 1: Table of land use types included within the tool and their descriptions.

Land use types used in the calculator tool	Description
Cereals	Agricultural areas on which cereals, combinable crops and set aside are farmed.
General	Agricultural areas on which arable crops (including field scale vegetables) are farmed.
Horticulture	Agricultural areas on which fruit (including vineyards), hardy nursery stock, glasshouse flowers and vegetables, market garden scale vegetables, outdoor bulbs and flowers, and mushrooms are farmed.
Pig	Agricultural areas on which pigs farmed.
Poultry	Agricultural areas on which poultry are farmed.
Dairy	Agricultural areas on which dairy cows are farmed.
LFA	Agricultural areas on which cattle, sheep and other grazing livestock are farmed in locations where agricultural production is difficult. An area is classified as a Less Favoured Area (LFA) holding if 50 per cent or more of its total area is classed as LFA.
Lowland	Agricultural areas on which cattle, sheep and other grazing livestock are farmed. A holding is classified as lowland if less than 50 per cent of its total area is classed as a lowland grazing area.
Mixed	Agricultural areas in which none of the above categories are farmed or where it is too difficult to select a single category to describe the farm type.
Greenspace	Natural and semi-natural outdoor spaces provided for recreational use where fertilisers will not be applied and dog waste is managed, e.g. semi-natural parks. This does not include green infrastructure within the built urban environment, such as sports fields, gardens, or grass verges, as these are included in the residential urban land category.
Woodland	Natural and semi-natural outdoor wooded areas.
Shrub	Natural and semi-natural outdoor shrubland area.
Water	Areas of surface water, including rivers, ponds and lakes.
Residential urban land	Areas of houses and associated infrastructure. This is inclusive of roads, driveways, grass verges and gardens.
Commercial/industrial urban land	Areas that are used for industry. These are businesses that typically manufacture, process or otherwise generate products. Included in the definition of industrial land are factories and storage facilities as well as mining and shipping operations.
Open urban land	Area of land in urban areas used for various purposes, e.g. leisure and recreation - may include open land, e.g. sports fields, playgrounds, public squares or built facilities such as sports centres.
Community food growing	Areas that are used for local food production, such as allotments.

Stage 3: calculate the annual nutrient load from new (post-development) land use on the development site

In this section the user will need to select the type and area of the landcover present on the development site after the development has been completed.

In the ‘New land use type(s)’ column of the main table in Stage 3 of the calculator, each cell has a drop-down list of land use types containing eight non-agricultural land use types that may be present on the post-development site. Please find out what land use types are within the development before completing this part of the tool. If there is a land use within the development area that is not in the list (see Table 1 for land use type descriptions), please select the most similar land use type.

Stage 4: calculate the net change in nutrient loading for the site and the final annual nutrient budget for the development site:

This final stage automatically uses the results from Stages 1-3 and calculates the nutrient budget using the equation shown in Figure 3.

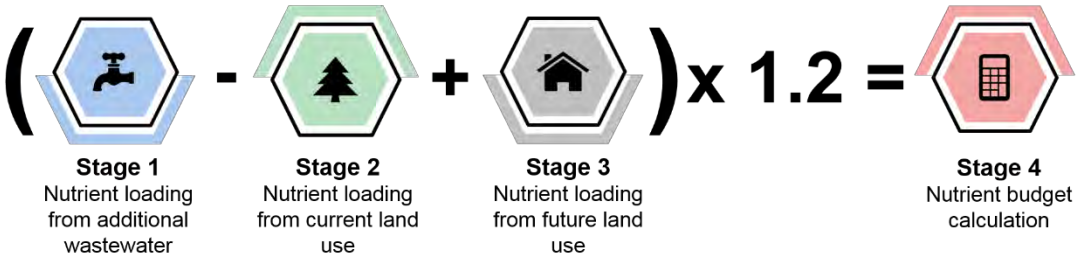
As Figure 3 shows, the output from Stage 4 of nutrient budget calculations is the balance of new sources of nitrogen and phosphorus from a development minus the existing sources of nitrogen and phosphorus from the pre-development site. To ensure the final figure is robust and suitably precautionary this balance is multiplied by 1.2, i.e. increased by a 20%, buffer'.

The 20% buffer is applied to account for the uncertainties that underlie the inputs to Stages 1-3 of the nutrient budget calculations, as well as accounting for some potential nutrient sources associated with new development that cannot be readily quantified. To cover all possible inputs to a nutrient budget with a high enough certainty to remove the need for the buffer would require extensive site-specific investigations. The 20% buffer is a means of accounting for the uncertainties within the nutrient budget calculations and providing confidence that mitigation of the nutrient budget will remove the risk of adverse effects on site integrity in the Broads SAC and Broadland Ramsar site.

The output in Stage 4 shows how much nutrient mitigation is required in kilograms per year to achieve nutrient neutrality.

If there are two values due to an upgrade occurring at the wastewater treatment works the development is connecting to, the calculator will show the total amount of nutrient mitigation that is needed before and after the upgrade.

Figure 3: The equation used to calculate the nutrient budget.



Designated Site Name:	The Broads SAC / Broadland Ramsar

Site Details:

From The Broads SAC citation:

The Broads in East Anglia contain several examples of naturally nutrient-rich lakes. Although artificial, having been created by peat digging in medieval times, these lakes and the ditches in areas of fen and drained marshlands support relict vegetation of the original Fenland flora, and collectively this site contains one of the richest assemblages of rare and local aquatic species in the UK.

The stonewort – pondweed – water-milfoil – water-lily (*Characeae –Potamogeton – Myriophyllum – Nuphar*) associations are well-represented, as are club-rush – common reed *Scirpo – Phragmitetum* associations. The dyke (ditch) systems support vegetation characterised by water-soldier *Stratiotes aloides*, whorled water-milfoil *Myriophyllum verticillatum* and broad-leaved pondweed *Potamogeton natans* as well as being a stronghold of little whirlpool ram's-horn snail *Anisus vorticulus* and Desmoulin's whorl snail *Vertigo moulinsiana* in East Anglia. The range of wetlands and associated habitats also provides suitable conditions for otters *Lutra lutra*.

The Broads is the richest area for stoneworts (charophytes) in Britain. The core of this interest is the Thurne Broads and particularly Hickling Broad, a large shallow brackish lake. Within the Broads examples of Chara vegetation are also found within fen pools (turf ponds) and fen and marsh ditch systems. The Broads supports a number of rare and local charophyte species, including *Chara aspera, C. baltica, C. connivens, C. contraria, C. curta, C. intermedia, C. pedunculata, Nitella mucronata, Nitellopsis obtusa, Tolypella glomerata* and *T. intricata*.

The complex of sites contains the largest blocks of alder *Alnus glutinosa* wood in England. Within the complex complete successional sequences occur from open water through reedswamp to alder woodland, which has developed on fen peat. There is a correspondingly wide range of flora, including uncommon species such as marsh fern *Thelypteris palustris*.

This site contains the largest example of calcareous fens in the UK. The great fen-sedge *Cladium mariscus* habitat occurs in a diverse set of conditions that maintain its species richness, including small sedge mires, and areas where great fen-sedge occurs at the limits of its ecological range. The habitat type forms large-scale mosaics with other fen types, fen meadows (with purple moor-grass *Moilinia caerulea*), open water and woodland, and contains important associated plants such as fen orchid *Liparis loeselii*, marsh helleborine *Epipactis palustris*, lesser tussock-sedge *Carex diandra*, slender sedge *C. lasiocarpa* and fibrous tussock-sedge *C. appropinquata*.

There are also areas of short sedge fen (both black bog-rush – blunt-flowered rush *Schoenus nigricans – Juncus subnodulosus* mire and bottle sedge – moss *Carex rostrata – Calliergon cuspidatum/giganteum mire*), which in places form a mosaic with common reed – milk-parsley *Phragmites australis – Peucedanum palustris* fen. The Broads also contain examples of transition mire, that are relatively small, having developed in re-vegetated peat-cuttings as part of the complex habitat mosaic of fen, carr and open water.

Reason for European Site Designation:

The Broads Special Area of Conservation is designated for the following features :

- H3140 Hard oligo-mesotrophic waters with benthic veg of *Chara* spp.
- H3150 Natural eutrophic lakes with *Magnopotamion* or *Hydrocharition*
- H6410 Molinia meadows on calcareous, peat or clay-silt soil
- H7140 Transition mires and quaking bogs
- H7210 Calcareous fens with *C. mariscus* and species of *C. davallianae*
- H7230 Alkaline fens
- H91E0 Alluvial woods with *A. glutinosa, F. excelsior*
- S1016 Desmoulin's whorl snail, *Vertigo moulinsiana*
- S1355 Otter, *Lutra lutra*
- S1903 Fen orchid, *Liparis loeselii*
- S4056 Little ram's-horn whirlpool snail, *Anisus vorticulus*

The Broadland Ramsar is designated for the following features:

- Bewick's swan, *Cygnus columbianus bewickii* - Wintering
- Floodplain alder woodland
- Floodplain fen
- Gadwall, *Anas strepera* - Wintering
- Shoveler, *Anas clypeata* - Wintering
- Wetland invertebrate assemblage
- Wetland plant assemblage
- Wigeon, *Mareca penelope* – Wintering

Links to Conservation Advice:
Conservation Objectives
Conservation Objectives Supplementary Advice
JNCC Ramsar Information Sheet

Nutrient Pressure(s) for which the site is unfavourable:

Nitrogen
Phosphorus

Water Quality Evidence:

In the Conservation Objectives Supporting Advice for the Broads SAC it states for phosphorus to 'maintain and, where necessary, restore stable nutrient levels appropriate for lake type' and for nitrogen it states to 'maintain and restore a stable nitrogen concentration'.

Water Quality data is reported against the relevant SSSI units within the SAC for the five SSSIs within the Broads SAC where there is currently good evidence that they are unfavourable due to nutrients.

Ant Broads and Marshes

Unit name	SSSI Unit	Monitoring point ID	WQ Target		WQ Monitoring Data[1]		Compliance with target – Pass/Fail and % reduction needed to achieve the WQ Target	
			TP (ug/l)	TN (mg/l)	TP (ug/l)	TN (mg/l)	TP	TN
Barton Broad	33	BARTON BROAD (R.ANT) AN-ANT160	30	1.07	64	1.9	FAIL 53% reduction needed	FAIL 44% reduction needed
Instead Holmes	34	No monitoring	30	1.07			Unknown	Unknown
Catfield broad	35	No monitoring	30	1.07			Unknown	Unknown
Cromes Broad	36	CROMES BROAD EDGE SAMPLE FROM SHORE AN-ANT170E	30	1.07	44	1.7	FAIL 30% reduction needed	FAIL 58% reduction needed
Reedham Water	37	No monitoring	30	1.07			Unknown	Unknown

[1] Water Quality Monitoring data from EA WIMS database. Nutrient concentrations reported are the 2019 annual mean for Total Phosphorus (TP) and Total Nitrogen (TN).

Bure Broads and Marshes

Unit name	SSSI Unit	Monitoring point ID	WQ Target		WQ Monitoring Data[2]		Compliance with target – Pass/Fail and % reduction needed to achieve the WQ Target	
			TP (ug/l)	TN (mg/l)	TP (ug/l)	TN (mg/l)	TP	TN
Decoy Broad	4	DECOY BROAD R.BURE AN-BUR158	30	1.07	74	3.04	FAIL 60% reduction needed	FAIL 65% reduction needed
Hoveton Great Broad	10	HOVETON GREAT BROAD AN-BUR158	30	1.07	70	2.5	FAIL 57% reduction needed	FAIL 57% reduction needed
Hudson's Bay	11	HUDSON'S BAY, HOVETON GREAT BROAD, R.BURE AN-BUR158HB	30	1.07	104	1.79	FAIL 72% reduction needed	FAIL 40% reduction needed
Ranworth Broad	12	RANWORTH BROAD AN-BUR170A	30	1.07	94	2.99	FAIL 68% reduction needed	FAIL 64% reduction needed
Cockshoot Broad	13	COCKSHOOT BROAD AN-BUR160A	30	1.46	49	1.37	FAIL 39% reduction needed	PASS
Ranworth Flood	14	Ranworth Flood AN-BUR170RF	30	1.07	1017*	3.16*	FAIL 97% reduction needed	FAIL 68% reduction needed

[2] Water Quality Monitoring data from EA WIMS database. Nutrient concentrations reported are the 2019 annual mean for Total Phosphorus (TP) and Total Nitrogen (TN).

*TP Data for Ranworth Flood is a mean of 7 samples for TP and 4 samples for TN taken in 2017

Trinity Broads SSSI

Unit name	SSSI Unit	Monitoring point ID	WQ Target		WQ Monitoring Data[3]		Compliance with target – Pass/Fail and % reduction needed to achieve the WQ Target	
			TP (ug/l)	TN (mg/l)	TP (ug/l)	TN (mg/l)	TP	TN
Filby Broad	20	FILBY BROAD AN-FIL010	30	1.07	42	0.89	FAIL 29% reduction needed	PASS
Lily Broad	21	Lily Broad AN-LIL010	30	1.07	78**	1.19**	FAIL 62% reduction needed	FAIL 10% reduction needed
Ormesby Broad	22	ORMESBY BROAD AN-ORM010	30	1.07	52	1.24	FAIL 42% reduction needed	FAIL 14% reduction needed
Ormesby Little Broad	23	ORMESBY LITTLE BROAD AN-ROL020	30	1.07	50	0.94	FAIL 40% reduction needed	PASS
Rollesby Broad Sailing Club	24	ROLLESBY BROAD SAILING CLUB AN-ROL010	30	1.07	39	1.01	FAIL 23% reduction needed	PASS

[3] Water Quality Monitoring data from EA WIMS database. Nutrient concentrations reported are the 2019 annual mean for Total Phosphorus (TP) and Total Nitrogen (TN).
** Data for Lily Broad is the mean of 5 (TN) and 8 (TP) samples from 2017.

Upper Thurne Broads and Marshes

Unit name	SSSI Unit	Monitoring point ID	WQ Target		WQ Monitoring Data[4]		Compliance with target – Pass/Fail and % reduction needed to achieve the WQ Target	
			TP (ug/l)	TN (mg/l)	TP (ug/l)	TN (mg/l)	TP	TN
Heigham Sound	15	HEIGHAM SOUND (R.THURNE) AN-THR040	30	1.07	54	1.97***	FAIL 44% reduction needed	FAIL 45% reduction needed
Hickling Broad	16	HICKLING BROAD (R.THURNE) AN-THR030A	30	1.07	52	1.6	FAIL 42% reduction needed	FAIL 33% reduction needed

Horsey Mere	17	HORSEY MERE (R.THURNE) AN-THR020	30	1.46	51	2.22	FAIL 41% reduction needed	FAIL 34% reduction needed
R. Thurne Martham Broad	18	R.THURNE MARTHAM BROAD AN-THR060	30	1.07	33	No data	FAIL 9% reduction needed	Unknown
Martham South Broad	19	MARTHAM SOUTH BROAD (R.THURNE) AN-THR061	30	1.07	33	1.11***	FAIL 9% reduction needed	FAIL 4% reduction needed

[4]Water Quality Monitoring data from EA WIMS database. Nutrient concentrations reported are the 2019 annual mean for Total Phosphorus (TP) and Total Nitrogen (TN).
*** TN data is the mean for May 2019- Mar 2020.

Yare Broads and Marshes

Unit name	SSSI Unit	Monitoring point ID	WQ Target		WQ Monitoring Data[5]		Compliance with target – Pass/Fail and % reduction needed to achieve the WQ Target	
			TP (ug/l)	TN (mg/l)	TP (ug/l)	TN (mg/l)	TP	TN
Surlingham Broad	11	No monitoring point					Unknown	Unknown
Rockland Broad	15	ROCKLAND BROAD OUTFLOW (SHORT DIKE) AN-YAR31010	30	1.07	217 (Jan – Dec 2019)	7.65 (Jan – Dec 2019)	FAIL 86% reduction needed	FAIL 86% reduction needed
Bargate broad	24	No monitoring point					Unknown	Unknown
Wheatfen Broad	25	WHEATFEN BROAD AN-YAR305	30	1.07	326 Feb – Dec 2017)	2.68 May – Dec 2017)	FAIL 91% reduction needed	FAIL 60% reduction needed
Strumpshaw Broad	26	STRUMPSHAW BROAD AN-YAR225	30	1.07	353 Feb – Dec 2017)	2.47 May – Dec 2017)	FAIL 92% reduction needed	FAIL 57% reduction needed
Buckingham Broad	27	No monitoring point					Unknown	Unknown
Hassingham Broad	28	No monitoring point					Unknown	Unknown

[5]Water Quality Monitoring data from EA WIMS database.

The condition of the waterbody and the habitats which support the designated features is in part dependent on the water quality within them.

The condition of the waterbody and the habitats which support the designated features is in part dependent on the water quality within them. Where excessive nutrients are present in a system this can lead to the occurrence of eutrophication, impacting on aquatic macrophyte flora and changes in water chemistry.

Recent Water Quality data shows Ant Broads and Marshes, Bure Broads and Marshes, Trinity Broads SSSI, Upper Thurne Broads and Marshes and Yare Broads and Marshes are exceeding (overall) the targets for Total Phosphorus and Total Nitrogen. Within these areas four units are achieving the target for TN: Cockshoot Broad, Filby Broad, Ormesby Little Broad and Rollesby Broad Sailing Club.

The water quality targets for the water bodies are also required for the water input into the wetland habitats and dyke features to avoid changes in species composition and the loss of characteristic and sensitive species.

Additional Information:

Habitat type impacted by nutrients – Standing Water

The Broads SAC and Broadland Ramsar are underpinned by multiple SSSIs. The component SSSIs being considered here include;

- Ant Broads and Marshes
- Bure Broads and Marshes
- Trinity Broads
- Upper Thurne
- Yare Broads and Marshes

SSSI interest features include:

<u>Ant Broads and Marshes SSSI</u>

- Assemblages of breeding birds - Lowland open waters and their margins
- Ditches
- Eutrophic lakes
- Floodplain fen (lowland)
- Invert. assemblage W211 open water on disturbed sediments
- Invert. assemblage W313 moss & tussock fen
- Invert. assemblage W314 reed-fen & pools
- Lowland mire grassland and rush pasture
- Ponds
- Population of Schedule 8 plant - *Liparis loeselii*, Fen Orchid
- Vascular plant assemblage
- Wet woodland

<u>Bure Broads and Marshes SSSI</u>

- Assemblages of breeding birds - Lowland fen without open water
- Eutrophic lakes
- Floodplain fen (lowland)
- Invert. assemblage W126 seepage
- Invert. assemblage W211 open water on disturbed sediments
- Invert. assemblage W313 moss & tussock fen
- Invert. assemblage W314 reed-fen & pools
- Lowland mire grassland and rush pasture
- Vascular plant assemblage
- Wet woodland

Trinity Broads SSSI

- Aggregations of breeding birds - Marsh harrier, *Circus aeruginosus*
- Aggregations of breeding birds - Pochard, *Aythya ferina*
- Aggregations of breeding birds - Shoveler, *Anas clypeata*
- Aggregations of breeding birds - Tufted duck, *Aythya fuligula*
- Aggregations of non-breeding birds - Bittern, *Botaurus stellaris*
- Aggregations of non-breeding birds - Pochard, *Aythya ferina*
- Aggregations of non-breeding birds - Shoveler, *Anas clypeata*
- Aggregations of non-breeding birds - Tufted duck, *Aythya fuligula*
- Assemblages of breeding birds - Lowland open waters and their margins
- Floodplain fen (lowland)
- Lowland wetland including basin fen, valley fen, floodplain fen, waterfringe fen, spring/flush fen and raised bog lagg
- Mesotrophic lakes
- Otter, *Lutra lutra*
- Vascular plant assemblage
- Wet woodland

Upper Thurne Broads and Marshes SSSI

- Aggregations of breeding birds - Avocet, *Recurvirostra avosetta*
- Aggregations of breeding birds - Bearded tit, *Panurus biarmicus*
- Aggregations of breeding birds - Bittern, *Botaurus stellaris*
- Aggregations of breeding birds - Marsh harrier, *Circus aeruginosus*
- Aggregations of breeding birds - Pochard, *Aythya ferina*
- Aggregations of non-breeding birds - Bewick's swan, *Cygnus columbianus bewickii*
- Aggregations of non-breeding birds - Gadwall, *Anas strepera*
- Aggregations of non-breeding birds - Shoveler, *Anas clypeata*
- Aggregations of non-breeding birds - Teal, *Anas crecca*
- Assemblages of breeding birds - variety of species
- Charophyte assemblage
- Ditches
- Floodplain fen (lowland)
- Invert. assemblage W314 reed-fen & pools
- Lowland mire grassland and rush pasture
- Mesotrophic lakes
- Nationally scarce plant - *Potamogeton coloratus*, Fen Pondweed
- Nationally scarce plant - *Thelypteris palustris*, Marsh Fern
- Nationally scarce plant - *Thyselium palustre*, Milk-parsley
- Vascular plant assemblage
- Wet woodland

Yare Broads and Marshes SSSI

- Aggregations of breeding birds - Cetti's warbler, *Cettia cetti*
- Aggregations of breeding birds - Gadwall, *Anas strepera*
- Aggregations of breeding birds - Marsh harrier, *Circus aeruginosus*
- Aggregations of non-breeding birds - Bean goose, *Anser fabalis*
- Aggregations of non-breeding birds - Hen harrier, *Circus cyaneus*
- Aggregations of non-breeding birds - Wigeon, *Anas penelope*
- Assemblages of breeding birds - Lowland open waters and their margins
- Ditches
- Eutrophic lakes
- Floodplain fen (lowland)
- Invert. assemblage W313 moss & tussock fen
- Invert. assemblage W314 reed-fen & pools

- Lowland mire grassland and rush pasture
- Vascular plant assemblage
- Wet woodland

Appendix 4

European protected sites requiring nutrient neutrality strategic solutions

Scale: 1:190,000

Component SSSIs of River Wensum SAC

- Local Authorities
- SSSI subject to nutrient neutrality strategy
- Nutrient neutrality SSSI catchment
- National Parks

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NATURAL ENGLAND

Nutrient Budget Calculator Guidance Document

Guidance for completion of a nutrient budget using the nutrient budget calculator tool

Prepared by Ricardo Energy and Environment on behalf of Natural England

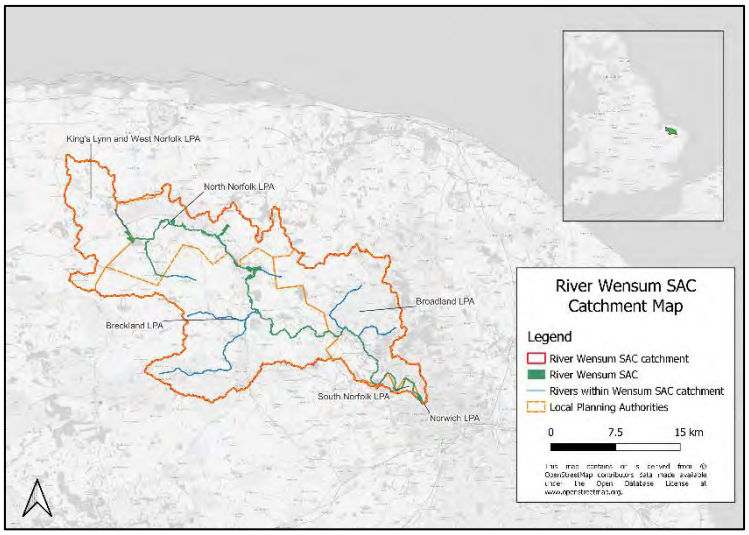
Issue 1

River Wensum Special Area of Conservation (SAC)

The River Wensum SAC is a Habitats site with water pollution and eutrophication considered a threat to its condition.

The Wensum is a low gradient, groundwater dominated river originating in northwest Norfolk, flowing southeast to Norwich where it joins the River Yare.

Intensive arable land-use dominates the landscape on the higher plateaus and valley sides, and grazing marsh, fen, reedbed, scrub and scattered woodland characterise the floodplain.



The current river channel is the product of a long history of modification and management. Anthropogenic influences have had a dramatic effect on the ecology and hydrology of the River Wensum, in particular at sites up and downstream of mill structures, sites affected by excessive silt deposition, sites that are heavily maintained and sites that lack natural riparian vegetation.

Regardless of this, the river supports over 100 species of plants, including three species of water-crowfoot. The river also supports white-clawed crayfish and populations of Desmoulin's whorl snail, Brook lamprey and Bullhead.

Increased levels of nitrogen and phosphorus entering aquatic environments via surface water and groundwater can severely threaten these sensitive habitats and species within the SAC. The elevated levels of nutrients can cause eutrophication, leading to algal blooms which disrupt normal ecosystem function and cause major changes in the aquatic community. These algal blooms can result in reduced levels of oxygen within the water, which in turn can lead to the death of many aquatic organisms including invertebrates and fish.

The habitats and species within the Wensum that result in designation as a SAC are referred to a 'qualifying features.' Not all of these qualifying features will be sensitive to changes in nutrients within the River Wensum. When completing an HRA involving nutrient neutrality, the Competent Authority (normally Local Planning Authority for developments) must identify and screen out qualifying features that are not sensitive to nutrients via a Habitats Regulations Assessment. Developers will be asked to submit information to support this process.

More detailed information on the qualifying features of the SAC and details of water quality data highlighting the current nutrient problems in the river are available in the Natural England River Wensum SAC evidence summary.

The requirement for Nutrient Neutrality

Special Areas of Conservation (SAC), Special Protection Areas (SPA), and Ramsar sites are some of the most important areas for wildlife in the United Kingdom. They are internationally important for their habitats and wildlife and are protected under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations). At some of these sites, there are high levels of nitrogen and phosphorus input to the protected water environment with sound evidence that these nutrients are causing eutrophication at these designated sites. These nutrient inputs currently mostly come either from agricultural sources or from wastewater from existing housing and other development. The resulting effects on ecology from an excessive presence of nutrients are impacting on protected habitats and species.

There is uncertainty as to whether new growth will further deteriorate designated sites, and/or make them appreciably more difficult to restore. The potential for future housing developments to exacerbate these impacts creates a risk to their potential future conservation status.

One way to address this uncertainty is for new development to achieve nutrient neutrality. Nutrient neutrality is a means of ensuring that development does not add to existing nutrient burdens and this provides certainty that the whole of the scheme is deliverable in line with the requirements of the Habitats Regulations.

Key Principles

The principles underpinning Habitats Regulations Assessments are well established[1]. At the screening stage, plans and projects should only be granted consent where it is possible to exclude, on the basis of objective information, that the plan or project will have significant effects on the sites concerned[2]. Where it is not possible to rule out likely significant effects, plans and projects should be subject to an appropriate assessment. That appropriate assessment must contain complete, precise and definitive findings which are capable of removing all reasonable scientific doubt as to the absence of adverse effects on the integrity of the site[3].

Natural England has been reviewing the available evidence on Habitats sites which are in unfavourable condition due to elevated nutrient levels. Where plans or projects will contribute additional nutrients to Habitats sites which are close to or already in unfavourable condition for nutrients, then a robust approach to the Habitats Regulations Assessment (HRA) of the effects of plans and projects is required.

Where sites are close to or already in unfavourable condition for nutrients, it may be difficult to grant consent for new plans and projects that will increase nutrient levels at the Habitats site. Nutrient neutrality provides a means of effectively mitigating the adverse effects associated with increased nutrients from new plans and projects, by counter-balancing any additional nutrient inputs to ensure that there is no net change in the amount of nutrients reaching the features which led to a Habitats site being designated.

Where new residential development is proposed, the additional nutrient load from the increase in wastewater and/or the change in the land use of the development land created by a new residential development can create an impact pathway for potential adverse effects on Habitats sites that are already suffering from problems related to nutrient loading. This impact pathway is shown diagrammatically in Figure 1. HRAs of new residential developments therefore need to consider whether nutrient loading will result in 'Likely Significant Effects' (LSE) on a Habitats site. If an HRA cannot exclude a LSE due to nutrient loading, the Appropriate Assessment (AA) will need to consider whether this nutrient load needs to be mitigated in order to remove adverse effects on the Habitats site.

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[1] See, amongst others Case C-127/02 *Waddenvereniging and Vogelsbeschermingvereniging* (Waddenzee); *R (Champion) v North Norfolk DC* [2015] EKSC 52 (Champion); C-323/17 *People Over Wind, Peter Sweetman v Coillte Teoranta* (People Over Wind); C-461/17 *Brian Holohan and Others v An Bord Pleanála* (Holohan); Joined Cases C-293/17 and C-294/17 *Coöperatie Mobilisation for the Environment UA and Others v College van gedeputeerde staten van Limburg and Other* (the Dutch Nitrogen cases);

[2] Case C-127/02 Waddenvereniging and Vogelsbeschermingvereniging (Waddenzee)

[3] Case 164/17 Grace & Sweetman v An Bord Pleanála (Grace & Sweetman)

For those developments that wish to pursue neutrality, Natural England advises that a nutrient budget is calculated for new developments that have the potential to result in increases of nitrogen/phosphorus entering the international sites. A nutrient budget calculated according to this methodology and demonstrating nutrient neutrality is, in our view, able to provide sufficient and reasonable certainty that the development does not adversely affect the integrity, by means of impacts from nutrients, on the relevant internationally designated sites. This approach must be tested through the AA stage of the HRA. The information provided by the applicant on the nutrient budget and any mitigation proposed will be used by the local planning authority, as competent authority, to make an AA of the implications of the plan or project on the Habitats sites in question.

The nutrient neutrality calculation includes key inputs and assumptions that are based on the best available scientific evidence and research. It has been developed as a pragmatic tool. However, for each input there is a degree of uncertainty. For example, there is uncertainty associated with predicting occupancy levels and water use for each household in perpetuity. Also, identifying current land / farm types and the associated nutrient inputs is based on best available evidence, research and professional judgement and is again subject to a degree of uncertainty.

It is our advice to local planning authorities to take a precautionary approach in line with existing legislation and case law when addressing uncertainty and calculating nutrient budgets. This should be achieved by ensuring nutrient budget calculations apply precautionary rates to variables and adding a buffer to the Total Nitrogen/Total Phosphorus figure calculated for developments. A precautionary approach to the calculations and solutions helps the local planning authority and applicants to demonstrate the certainty needed for their assessments.

By applying the nutrient neutrality methodology, with the buffer, to new development, the competent authority may be satisfied that, while margins of error will inevitably vary for each development, this approach will ensure that new development in combination will avoid significant increases of nitrogen load from entering the internationally designated sites.[4]

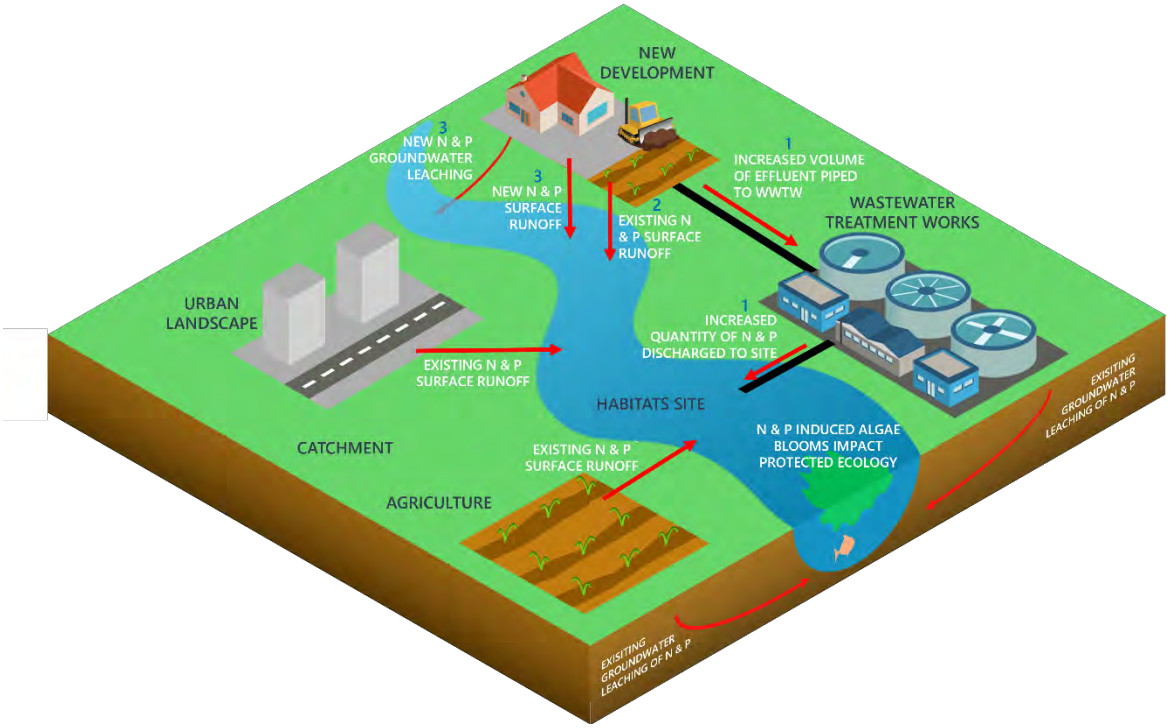
A HRA must be capable of removing all reasonable scientific doubt as to the absence of adverse effects on a Habitats site. Absolute certainty is not required, but the methodology used to evaluate potential adverse effects (and the measures intended to mitigate them) must effectively address any reasonable scientific doubt to achieve the required degree of certainty.

The first step in an AA that is applying nutrient neutrality is to understand whether a development will cause additional nutrient inputs to the River Wensum SAC. This requires calculation of the amount of nutrients a new residential development will create, otherwise known as a nutrient budget.

If a nutrient budget shows that a new development will increase the nutrient input to the River Wensum SAC and it is not possible to conclude no adverse effect on site integrity alone or in combination, then this is the amount of nutrients that require mitigating on an annual basis to achieve nutrient neutrality and therefore enable a conclusion of no adverse effect on site integrity to be reached.

[4] This approach was expressly endorsed in *R (Wyatt) v Fareham BC* [2021] EWHC 1434 (Admin)

Figure 1: Diagram demonstrating the potential nutrient impact pathways from a new development to a Habitats site. An increase in nitrogen and phosphorus availability in aquatic ecosystems can lead to various problems, such as algae blooms, which can have detrimental impacts on the ecology of a Habitats site.



What is this guidance for?

This guidance document accompanies the River Wensum SAC nutrient budget calculator. The nutrient budget calculator is used to calculate the change in nutrient input from a new residential development to the River Wensum SAC. The calculator can be used to inform an AA which is looking to apply nutrient neutrality to show whether a new development will require nutrient mitigation and if so, the amount of phosphorus loading that requires counterbalancing through mitigation measures to enable a conclusion of no adverse effect on site integrity, alone or in combination.

The guidance document contains the following:

- Step-by-step instructions on how to collect the specific data required as inputs to the tool.
- Instructions on how to use the tool.

Who is the guidance for?

This guidance is for anyone who needs to complete a nutrient budget calculation to support an AA of residential development in the River Wensum SAC catchment. The tool is primarily aimed at developers who need to complete a nutrient budget calculation to support a planning application and Local Planning Authorities who need to understand the mitigation requirements for future development or assess planning applications. It could also be used by communities or environmental groups wanting to understand the impacts of a local development on the nutrient inputs to the River Wensum SAC.

Summary of how the calculator works.

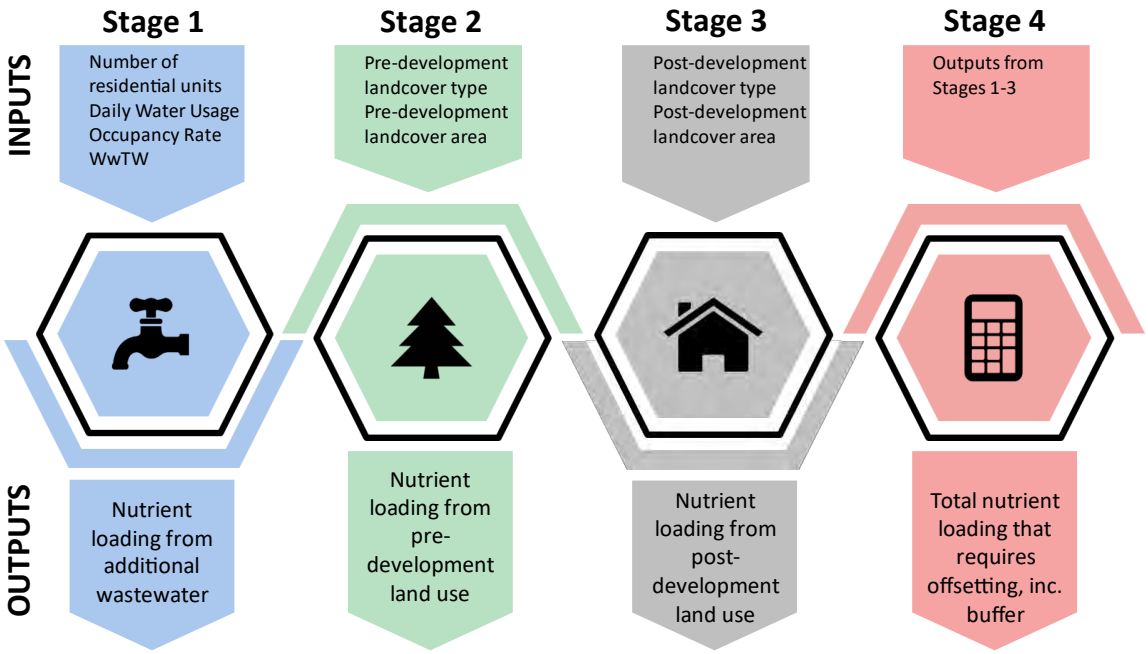
Overview

The nutrient budget calculator requires a set of inputs in order to calculate a new development's nutrient budget. The calculations are completed in four stages:

1. Calculate the increase in nutrient loading that comes from a development's wastewater.
2. Calculate the pre-existing nutrient load from current land use on the development site.
3. Calculate the future nutrient load from land use on the development site post-development.
4. Calculate the net change in nutrient loading from the development to the River Wensum SAC with the addition of a buffer. The net change in nutrient loading + the buffer is the nutrient budget.

These key inputs and outputs for each stage can are shown schematically in Figure 2.

Figure 2: Schematic showing the key inputs and outputs associated with each stage of the nutrient budget calculation methodology



Note: the values that come pre-entered in this tool have been chosen based on research to select inputs that meet the HRA tests of beyond reasonable scientific doubt, best available evidence, in perpetuity and were chosen in accordance with the precautionary principle. It is highly unadvisable to edit the values in this tool without a sufficient evidence base to justify any changes.

Data Collection and preparation

The nutrient budget calculator requires a set of inputs as shown in Figure 2. This section does not provide instructions on how to gather development specific information, such as the number of properties being constructed, as this should be known by the developer and should be detailed in the planning application. The subsections below provide guidance on how to identify certain inputs that are needed to complete the calculations for each stage of the nutrient budget calculations. The information required is available from free to access data sources[5]. Most of the required inputs are for factors that are specific to the location of a development site or the hydrological catchment of the River Wensum SAC.

The instructions below are divided by the stage where the data will be required. We advise that you collect and note down this data before starting to input information into each stage of the nutrient budget calculator.

Stage 2 & 3: Instructions for finding the Operational Catchment that the development is located within

- Go to this link: http://environment.data.gov.uk/catchment-planning/
- Search the location by place name, postcode etc. This will give a high-level view of the area. Use the zoom feature to find the exact location of the development.
- Click on the light blue area on the map in which the development is located. This will bring the user to the Operational Catchment page
- Make a note of the name of the Operational Catchment and select it from the dropdown list in the 'Catchment' cell when you get to this part of the calculator tool.

Note: the River Wensum SAC catchment is within a single Operational Catchment and so there is only one option that is pre-selected in the 'Catchment' cell of the calculator.

Stage 2: Instructions for finding the soil drainage type associated with the predominant soil type within the development site

- Go to this link: http://www.landis.org.uk/soilscapes/#
- Find your development site location on the map by using the search bar on the right side of the map in the 'Search' tab. Searching a location should generate a pop-up window in which you can view the soil information by clicking 'View soil information'. If this is not an option then click on the relevant soil type on the map and click on the 'Soil information' tab on the right-hand side of the map, below the 'Search' tab.
- The 'Soil drainage type' value can be found in the 'Soil information' under the title 'Drainage:'
- Make a note of this soil type and select the relevant soil drainage type from the drop-down list in the 'Soil drainage type' cell when you get to this part of the calculator tool.

Stage 2: Instructions for finding the annual average rainfall that the development site will receive

- Go to this link: https://nrfa.ceh.ac.uk/data/station/spatial/34004
- This link will bring the user to the Wensum at Costessey Mill flow gauge catchment information page.
- Click on the dropdown list next to the title 'Select spatial data type to view:' on the left of the map and select 'Rainfall'.
- Select the Legend tab.
- Zoom in on the map to find the location of the development and find the corresponding rainfall range from the Legend. Note that you cannot search this map using location information and will need to 'surf' around the map to find your development site location.

[5] Correct at the time of writing. These data sources are available from websites that currently have government funding but it should be noted that these datasets may become unavailable if funding is removed.

- Make a note of the relevant rainfall band for your site and use it to select this rainfall band from the drop-down list in the 'Average annual rainfall' cell when you get to this part of the calculator tool.

Stage 2: Instructions for finding out whether the development is in a Nitrate Vulnerable Zone (NVZ)

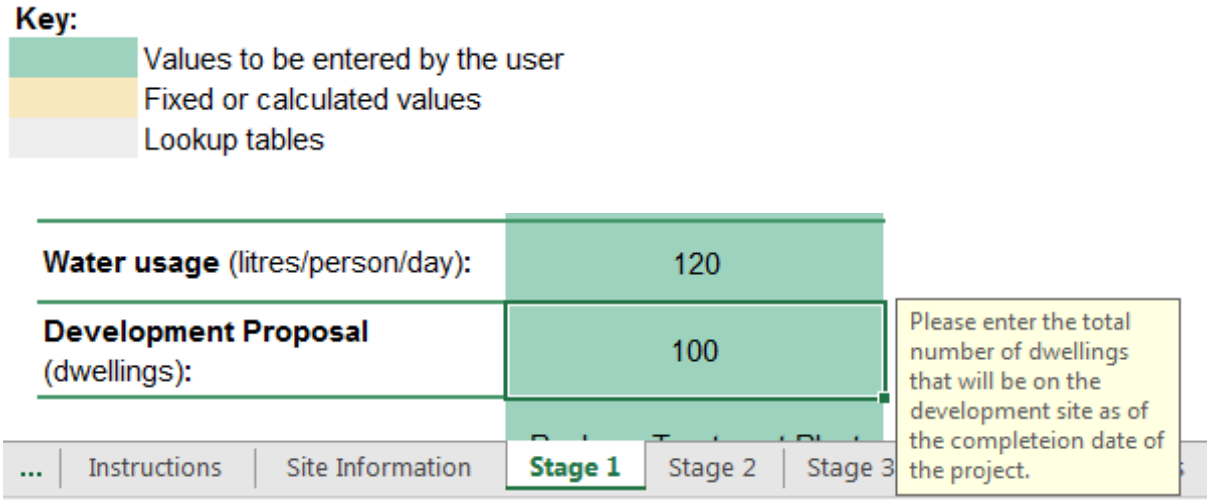
- Go to this link http://mapapps2.bgs.ac.uk/ukso/home.html?layers=NVZEng
- Enter the location of the development site in the search bar.
- Once the area has been located, click on the map where the development is located to find out if it is within an NVZ.
- Make a note of this information. It will be needed to select 'Yes' or 'No' from the 'Within Nitrate Vulnerable Zone (NVZ)' cell when you get to this part of the calculator tool.

Note: some of the values you select above will also be used in the Stage 3 calculations, however you only need to add the above details to the table in Stage 2 of the calculator and the required values for stage 3 will be carried through automatically.

How to use the calculator:

General tips

- The key below shows the colour coding used to highlight which cells need to be completed.
- When a cell is selected, instructions on how to fill out the cell that is selected are shown.
- Some cells will have values pre-populated, like the 'Water usage' input. The instructions for each cell will detail if an alternative value can be used.
- It is advisable to retain a default copy of this calculator tool workbook which has not had any development details added. "Save as" a new copy each time you calculate a budget for a new development in case any of the default values in the in the workbook get overwritten and are needed again.



Stage 1: calculate the new nutrient load associated with the additional wastewater

In this section the user will need to enter:

- The date of first occupancy. *This is because some wastewater treatment works may be due an upgrade in 2025 that will change the nitrogen or phosphorus output from this works, which will in turn change the output from this stage of the calculations. If this is the case, it will be apparent*

in the calculated values if there is an upgrade to a treatment works that affects the nutrient budget.

- The average occupancy rate of the development will need to be entered in people per dwelling for residential dwellings or units for other types of overnight accommodation which would result in an increase in overnight accommodation. The default setting for residential dwellings is the national occupancy rate of 2.4 people per dwelling. **Only change this value if there is sufficient evidence that a different occupancy rate is appropriate** (see Occupancy Rate Guidance section below for when a local or regional occupancy rate is acceptable).

- The number of dwellings / units[6] that will be within the development at the time of completion.

- The wastewater treatment works that the development will connect to. If required this information can be obtained from the sewerage undertaker for the development site. If it is not feasible to connect to mains sewerage and a septic tank (ST) or package treatment plant (PTP) is being used, please select this option. Please be aware that if the total nitrogen (TN) or total phosphorus (TP) final effluent concentrations (in mg/l) are specified by the manufacturer, please select 'Septic Tank user defined' or 'Package Treatment Plant user defined' and enter the specified value in the cell where prompted. If you do not have a TP or TN value provided by the manufacturer, select the 'Septic Tank default' or 'Package Treatment Plant default' option and a value will be provided automatically.

Occupancy Rate Guidance:

As set out in the guidance below, the Local Planning Authority/Competent Authority will need to ensure that the occupancy rate is appropriate to development within their Authority area. **It is therefore recommended that the occupancy rate is agreed with the Local Planning Authority before completing the nutrient budget calculation.**

Competent authorities must satisfy themselves that the residents per dwelling/unit value used in this step of the calculation reflects local conditions in their area. The residents per dwelling value can be derived from national data providing it reflects local conditions. However, if national data does not yield a residents per dwelling/unit value that reflects local occupancy levels then locally relevant data should be used instead. Whichever figure is used, it is important to ensure it is sufficiently robust and appropriate for the project being assessed. **It is therefore recommended that project level Appropriate Assessments specifically include justification for why the competent authority has decided upon the occupancy rate that has been used.**

Further guidance is provided below.

National occupancy data

When using national occupancy data, the Office of National Statistics (ONS) national average value for the number of residents per dwelling of 2.4 is recommended. This value is derived from 2011 census data and is subject to change when the 2021 Census becomes available. This value can be used if the Local Planning Authority is satisfied that:

- It is appropriate for the level and type of housing development that is expected to come forward in the Local Planning Authority's area (a strategic assessment should be made of the development anticipated to come forward over the Local Plan period to ensure the use of average figures will not under/overestimate the level of impact)

[6] The term 'dwellings' has a specific legal meaning derived from the use classes order. To ensure that all relevant forms of development which would result in an increase in overnight accommodation such as hotel rooms, short term holiday lets etc are considered in the HRA process the term units is used

- It corresponds to the local average in the area (it is not likely to overestimate or underestimate occupancy)
- It is based on data that is robust and doesn't underestimate the level of impact over time.

It may not be appropriate to use the national average occupancy rate for development types which are not included in the ONS data, such as student accommodation or houses in multiple occupation. For such developments, the Local Planning Authority should specify an appropriate occupancy rate in the project level Appropriate Assessment and explain how this figure was derived.

Locally relevant occupancy data

If the national average occupancy rate does not correspond with local conditions, then a locally relevant average residents per dwelling value may be more appropriate. If a Local Planning Authority decides to use a locally relevant value, that value needs to be supported by robust and sufficient evidence which should be included in the project level Appropriate Assessment. Key sources of evidence include:

- The average occupancy rate from the census for the relevant local administrative area, e.g. the county.
- The average occupation figures used by the Local Planning Authority to calculate population growth due to Local Plan development.
- The average occupation figures used by the local water company to plan for population growth and the impact on water resources and sewage treatment.

A local / regional average occupancy rate can be used provided that it is from a robust source which can show trends over a protracted period of time– such as from ONS derived data or from the annual English Housing Survey. Figures derived from data collected over short periods of time will not be acceptable as short-term data is unlikely to provide the required degree of certainty. The Local Planning Authority should ensure that any trend in occupancy rates or estimates of the average number of persons per household used will continue for perpetuity and would not underestimate the level of impact over time. A local / regional average occupancy rate would therefore need to be based on figures over at least a 5-year period[7].

Local Planning Authorities will also need to satisfy themselves that a locally derived occupancy figure is appropriate for the level and type of housing development that is expected (a strategic assessment should be made of the development anticipated to come forward over the Local Plan period to ensure the use of average figures will not under/overestimate the level of impact).

Occupancy rates based on dwelling type

Should the nature or scale of development associated with a particular project proposal suggest that the use of an average occupancy rate is not appropriate, then the Local Planning Authority may decide to adopt an occupancy rate based on the dwelling types proposed for that particular project, provided it meets the criteria outlined above. This may be appropriate where a project proposer seeks consent for a development comprising certain dwelling types (e.g. flats and small 1 and 2 bed dwellings). If the Local Planning Authority decides to adopt a local approach based on determining occupancy rate by dwelling type, that approach should be used for all planning applications, rather than reverting back to the use of an average occupancy rate. This will ensure that the Local Planning Authority doesn't inadvertently underestimate total occupancy levels (and consequently water quality impacts) across its area by applying a lower residents per dwelling/unit value for developments comprising smaller units but failing to adopt a higher residents per dwelling/unit value for developments comprising larger units or a mix of units.

[7] The figure of 5 years has been chosen as the minimum period of time over which occupancy rates can be calculated from as local plans and WRMPs are reviewed every 5 years, so represents a long enough period of time to capture any trends or changes.

Consistency in applying occupancy rates

The same occupancy rate should be used where there are several different impacts on Habitat sites which require strategic mitigation. The strategic approaches developed with local planning authorities to deal with in combination impacts on international sites elsewhere typically calculate mitigation requirements and contribution requirements based on current national average occupancy rates. Local Planning Authorities may decide to use a locally derived average occupancy rate instead, but this local occupancy rate must be used consistently across each type of impact and each Habitats site affected. Local Planning Authorities should not use different occupancy rates in their HRAs for the same dwelling types / size of units. Whilst the impacts will be different, occupancy rates will have been used to estimate the scale of impact and subsequently the scale of mitigation required on the protected sites. The types of impact will typically last in perpetuity. Care is therefore needed to ensure the adoption of an alternative occupancy rate based on an assessment of net population additions to a locality for nutrient budgeting does not undermine other existing strategic approaches, particularly where there are overlapping impacts within the locality.

Note: When 2021 Census data is available, the 2.4 value will be updated.

Note: if an ST or PTP is being used then a comprehensive maintenance regime is required as part of the application process. Please consult your Local Planning Authority for further advice on how to specify this maintenance regime and demonstrate that it is appropriately secured. If the ST or PTP which is being used has phosphate stripping capabilities, chemical dosing may be required. If chemical dosing is required, a robust management plan that details how chemicals are stored, the dilution rates, dosing frequencies, that any chemicals used will not have an environmental impact etc. must also accompany the planning application. PTPs with chemical dosing may not be appropriate in all cases.

Stage 2 - calculate the annual nutrient load from existing (pre-development) land use on the development site

In this section some environmental information about the development will need to be entered as well as the type and area of landcover that is being developed. The environmental information required is described above.

Only the types and areas of land that are being altered by the development should be entered. For example, if two hectares of agricultural land within a ten-hectare development site are being retained in the same agricultural use, this area should not be included in the calculations.

In the 'Existing land use type(s)' column of the main table in Stage 2 of the calculator, each cell has drop-down list of land use types. This list contains seven agricultural land cover types to choose from and eight different non-agricultural land cover types that may be present on a pre-development site. Please find out what land use types are within the development before completing this tool. If there is a land use within the development area that is not in the list, please select the most similar land use type. Table 1 provides a description of the different land use types available within the calculator tool.

Table 1: Table of land use types included within the tool and their descriptions.

Land use types used in the calculator tool	Description
Cereals	Agricultural areas on which cereals, combinable crops and set aside are farmed.
General	Agricultural areas on which arable crops (including field scale vegetables) are farmed.
Horticulture	Agricultural areas on which fruit (including vineyards), hardy nursery stock, glasshouse flowers and vegetables, market garden scale vegetables, outdoor bulbs and flowers, and mushrooms are farmed.
Pig	Agricultural areas on which pigs farmed.
Poultry	Agricultural areas on which poultry are farmed.
Dairy	Agricultural areas on which dairy cows are farmed.
LFA	Agricultural areas on which cattle, sheep and other grazing livestock are farmed in locations where agricultural production is difficult. An area is classified as a Less Favoured Area (LFA) holding if 50 per cent or more of its total area is classed as LFA.
Lowland	Agricultural areas on which cattle, sheep and other grazing livestock are farmed. A holding is classified as lowland if less than 50 per cent of its total area is classed as a lowland grazing area.
Mixed	Agricultural areas in which none of the above categories are farmed or where it is too difficult to select a single category to describe the farm type.
Greenspace	Natural and semi-natural outdoor spaces provided for recreational use where fertilisers will not be applied and dog waste is managed, e.g. semi-natural parks. This does not include green infrastructure within the built urban environment, such as sports fields, gardens, or grass verges, as these are included in the residential urban land category.
Woodland	Natural and semi-natural outdoor wooded areas.
Shrub	Natural and semi-natural outdoor shrubland area.
Water	Areas of surface water, including rivers, ponds and lakes.
Residential urban land	Areas of houses and associated infrastructure. This is inclusive of roads, driveways, grass verges and gardens.
Commercial/industrial urban land	Areas that are used for industry. These are businesses that typically manufacture, process or otherwise generate products. Included in the definition of industrial land are factories and storage facilities as well as mining and shipping operations.
Open urban land	Area of land in urban areas used for various purposes, e.g. leisure and recreation - may include open land, e.g. sports fields, playgrounds, public squares or built facilities such as sports centres.
Community food growing	Areas that are used for local food production, such as allotments.

Stage 3: calculate the annual nutrient load from new (post-development) land use on the development site

In this section the user will need to select the type and area of the landcover present on the development site after the development has been completed.

In the ‘New land use type(s)’ column of the main table in Stage 3 of the calculator, each cell has a drop-down list of land use types containing eight non-agricultural land use types that may be present on the post-development site. Please find out what land use types are within the development before completing this part of the tool. If there is a land use within the development area that is not in the list (see Table 1 for land use type descriptions), please select the most similar land use type.

Stage 4: calculate the net change in nutrient loading for the site and the final annual nutrient budget for the development site:

This final stage automatically uses the results from Stages 1-3 and calculates the nutrient budget using the equation shown in Figure 3.

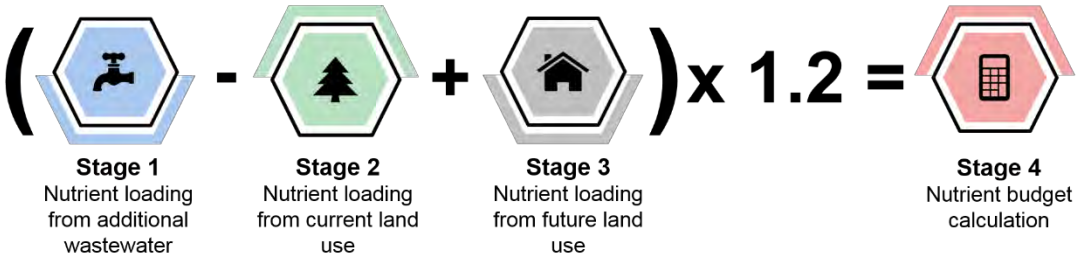
As Figure 3 shows, the output from Stage 4 of nutrient budget calculations is the balance of new sources of phosphorus from a development minus the existing sources of phosphorus from the pre-development site. To ensure the final figure is robust and suitably precautionary this balance is multiplied by 1.2, i.e. increased by a 20%, buffer'.

The 20% buffer is applied to account for the uncertainties that underlie the inputs to Stages 1-3 of the nutrient budget calculations, as well as accounting for some potential nutrient sources associated with new development that cannot be readily quantified. To cover all possible inputs to a nutrient budget with a high enough certainty to remove the need for the buffer would require extensive site-specific investigations. The 20% buffer is a means of accounting for the uncertainties within the nutrient budget calculations and providing confidence that mitigation of the nutrient budget will remove the risk of adverse effects on site integrity in the River Wensum SAC.

The output in Stage 4 shows how much nutrient mitigation is required in kilograms per year to achieve nutrient neutrality.

If there are two values due to an upgrade occurring at the wastewater treatment works the development is connecting to, the calculator will show the total amount of nutrient mitigation that is needed before and after the upgrade.

Figure 3: The equation used to calculate the nutrient budget.



Designated Site Name:	River Wensum SAC

Site Details:

From the River Wensum SAC citation:

The Wensum is a naturally enriched, calcareous lowland river. The upper reaches are fed by springs that rise from the chalk and by run-off from calcareous soils rich in plant nutrients. This gives rise to beds of submerged and emergent vegetation characteristic of a chalk stream. Lower down, the chalk is overlain with boulder clay and river gravels, resulting in aquatic plant communities more typical of a slow-flowing river on mixed substrate.

Much of the adjacent land is managed for hay crops and by grazing, and the resulting mosaic of meadow and marsh habitats, provides niches for a wide variety of specialised plants and animals. *Ranunculus* vegetation occurs throughout much of the river's length.

Stream water-crowfoot *R. penicillatus* ssp. *pseudofluitans* is the dominant *Ranunculus* species but thread-leaved *watercrowfoot R. trichophyllus* and fan-leaved water-crowfoot *R. circinatus* also occur in association with the wide range of aquatic and emergent species that contribute to this vegetation type.

The river should support an abundant and rich invertebrate fauna including the native freshwater crayfish *Austropotamobius pallipes* as well as a diverse fish community, including bullhead *Cottus gobio* and brook lamprey *Lampetra planeri*. The site has an abundant and diverse mollusc fauna which includes Desmoulin's whorl-snail *Vertigo moulinsiana*, which is associated with aquatic vegetation at the river edge and adjacent fens.

Reason for European Site Designation:

The River Wensum Special Area for Conservation is designated for the following features:

- H3260 Water courses of plain to montane levels with *R. fluitantis*
- S1016 Desmoulin's whorl snail, *Vertigo moulinsiana*
- S1092 Freshwater crayfish, *Austropotamobius pallipes*
- S1096 Brook lamprey, *Lampetra planeri*
- S1163 Bullhead, *Cottus gobio*

Links to Conservation Advice:
Conservation Objectives
Conservation Objectives Supplementary Advice

Nutrient Pressure(s) for which the site is unfavourable:

Phosphorus

Water Quality Evidence:

In the Conservation Objectives Supplementary Advice for the River Wensum SAC it states 'restore the natural nutrient regime of the river, with any anthropogenic enrichment above natural/background concentrations limited to levels at which adverse effects on characteristic biodiversity are unlikely'

Water Quality data is reported against the respective SSSI units within the SAC. The data reported here are from the same monitoring points as those used in the River Wensum Diffuse Water Pollution Plan.

Unit name	SSSI Unit	Monitoring point ID	WQ Target	WQ Monitoring Data[1]	Compliance with target – Pass/Fail and % reduction needed to achieve the WQ Target
			Soluble Reactive Phosphorus (ug/l), annual mean	Orthophosphate, reactive as P (ug/l), mean	Compliance with target – Pass/Fail and % reduction needed to achieve the WQ Target
Wensum Above Confluence with Tat	45	R.Wensum Helhoughton Bridge An-Wen020	20	39.3 (Feb 2019 – Jan 2022)	FAIL 49% reduction needed
Tat Above Confluence with Wensum	46	R.Tat Tatterford Common (R.Wensum) An-Wen010	20	80.9 (Feb 2019 – Jan 2022)	FAIL 75% reduction needed
Confluence - Fakenham Mill	47	R.Wensum Sculthorpe Mill An-Wen040	30	45.2 (Feb 2019 – Jan 2022)	FAIL 34% reduction needed
		R. Wensum Goggs Mill Rd. Br. Hempton An-Wen045	30	46.1 (Jan 2019 – Dec 2021)	FAIL 35% reduction needed
Fakenham Mill - Great Ryburgh Mill	48	R.Wensum Great Ryburgh Bridge An-Wen070	30	59 (Oct 2011 – Sept 2014)	FAIL – older data 49% reduction needed
Great Ryburgh Mill - Bintree Mill	49	No Monitoring Point	30	-	Unknown
Bintree Mill - North Elmham Mill	50	R.Wensum County School Bridge An-Wen102	30	71.6 (May 2019 – Dec 2021)	58% reduction needed
North Elmham Mill - Elsing Mill	51	R.Wensum Swanton Morley Bridge An-Wen180	30	57.6 (Feb 2019 – Jan 2022)	FAIL 48% reduction needed
Elsing Mill - Lenwade Mill	52	R. Wensum Lyng Road Bridge An-Wen1905	30	64.9 (Jan 2019 – Dec 2021)	FAIL 54% reduction needed
Lenwade Mill - Taverham Mill	53	R.Wensum Great Witchingham Bridge An-Wen200	30	59.7 (Feb 2019 – Jan 2022)	FAIL 50% reduction needed
Taverham Mill - Hellesdon Mill	54	R.Wensum Taverham Bridge An-Wen235	30	63.8 April 2017 – March 2020)	FAIL 53% reduction needed

Langor Drain Above Conf. with Wensum	55	Kettlestone Str. Langer Br. (R.Wensum) An-Wen060	30	75 (Aug 2014 – Jul 2017)	FAIL 60% reduction needed

[1]Water Quality Monitoring data from EA WIMS database, the date range is in brackets. Any sample results below the level of detection (LOD) were taken at face values in the calculation of the mean. Following the rivers common standards monitoring guidance the mean of 3 years of data used where available.
The condition of the waterbody and the habitats which support the designated features is in part dependent on the water quality within them.

The occurrence of elevated nutrients in the waterbody can impact on the competitive interactions between high plant species and between higher plant species and algae, which can result in a loss of characteristic plant species. Changes in plant growth and community composition and structure can have implications for the wider food web, and the species present. Increased nutrients and the occurrence of eutrophication can also impact on the dissolved oxygen levels in the waterbody and substrate condition, also impacting on biota within the river.

Recent water quality measurements for the River Wensum within the SAC show phosphorus concentrations to be exceeding the targets for all unit where there is monitoring data. Any nutrients entering the catchment upstream of the locations which are exceeding their nutrient targets, will make their way downstream and have the potential to further add to the current exceedance. Therefore, for the River Wensum, the whole upstream catchment is included within the catchment map.

Additional Information:

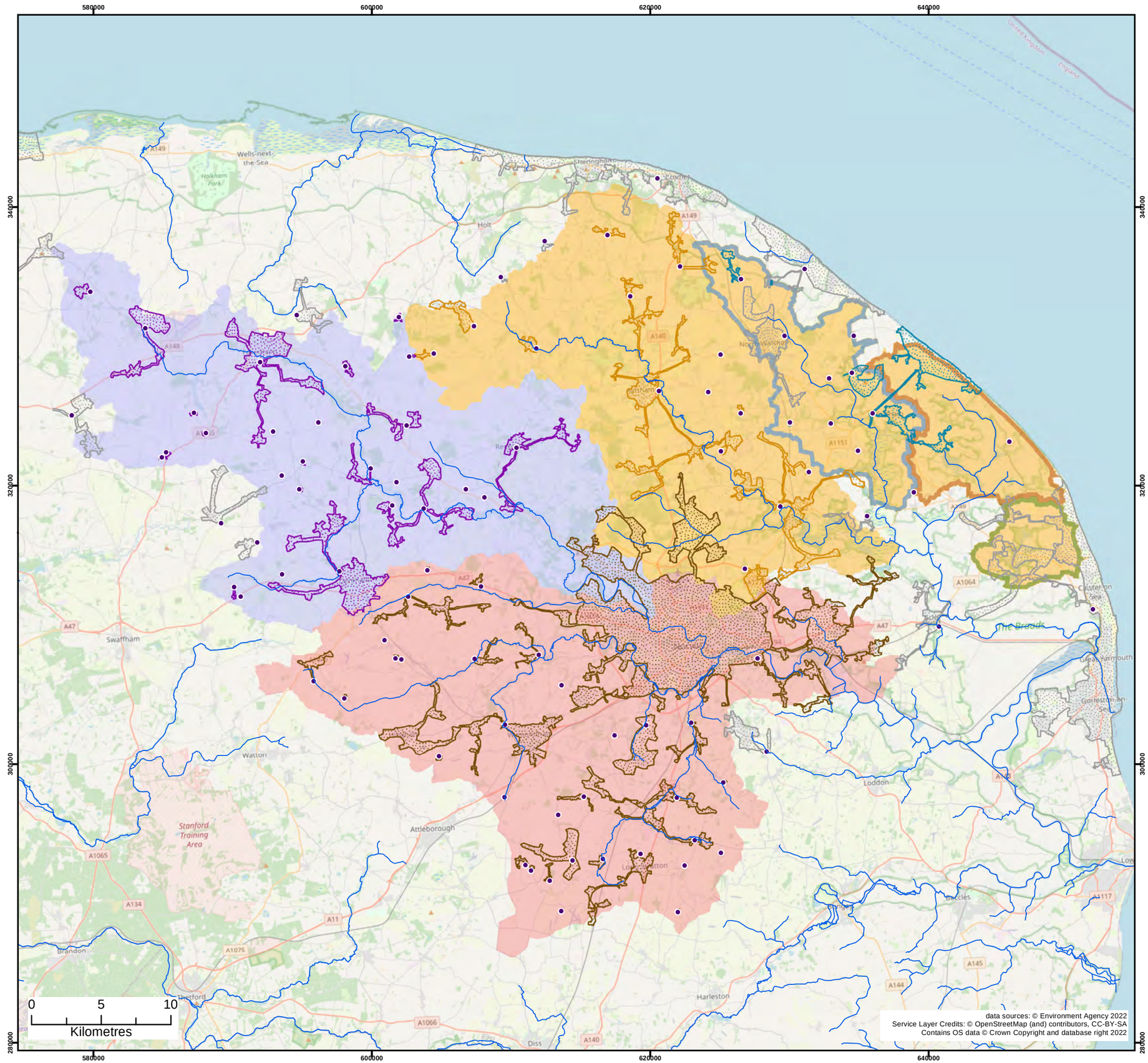
Habitat type impacted by nutrients - Riverine

The Special Area for Conservation is legally underpinned by the River Wensum SSSI

SSSI interest features include:

- River supporting habitat
- Rivers and Streams

Appendix 5



Legend:

- Wastewater Treatment Works
- Main Rivers
- WwTWs that do not drain into the catchment

WwTWs within the catchment

- River Bure
- River Bure - Ant Broads
- River Bure - Hickling Broad
- River Wensum
- River Yare

Surface Water Catchments

- River Wensum
- River Yare
- River Bure
- River Bure - Hickling Broad
- River Bure - Filby Broad
- River Bure - Ant Broads

Client:	Project:
Norfolk Council	Norfolk Nutrients Project

Title: Nutrient Catchment Map (overview)

Figure: 2 | Drawing No: PC3719-RHD-ZZ-XX-DR-Z-0002

Revision:	Date:	Drawn:	Checked:	Size:	Scale:
01	29/09/2022	GC	LB	A3	1:275,000

Co-ordinate system: British National Grid

Royal HaskoningDHV
Enhancing Society Together

REPORT

Norfolk Nutrient Budget Calculator

Technical Reference Report

Client: Norfolk Combined Authorities

Reference: PC3719-RHD-ZZ-XX-RP-Z-0001
Status: S0/P01.01
Date: 22 September 2022

Royal HaskoningDHV
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Project number: PC3719
Author(s): Oliver Bowers & Ian Dennis

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Date: 21/09/2022

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Classification
Project related

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Table of Contents

1.1	Introduction	4
1.1.1	Evidence-based approach	4
1.1.2	Use of the calculator	4
1.2	Stage 1: Calculate nutrient loading from additional wastewater	7
1.2.1	Stage 1 methodology	7
1.2.2	Average occupancy rates	7
1.2.3	Water usage per person	8
1.2.4	Wastewater discharge concentrations	8
1.2.4.1	Water Recycling Centre	8
1.2.5	On-site treatment plant	10
1.3	Stage 2 & 3: Calculate nutrient loading from land use	11
1.3.1	Stage 2 & 3 methodology	11
1.3.2	Rainfall data	11
1.3.3	Agricultural runoff coefficients	11
1.3.4	Non-agricultural land runoff coefficients	13
1.3.5	Urban land runoff coefficients	13
1.4	Stage 4: Calculating the nutrient budget	16
1.4.1	Stage 4 methodology	16
1.4.2	Precautionary buffer	16
1.5	Mitigation	16
1.5.1	Mitigation methodology	16
1.6	Zero-value calculator	16
1.6.1	Zero-value calculator methodology	17
1.7	Summary	17
1.8	References	20

Table of Tables

Table 1: Measured discharge concentrations of permitted WRCs 9
Table 2: Default onsite treatment plants effluent concentrations 10
Table 3: Soil types by drainage category 12
Table 4: Non-agricultural land runoff coefficients 13
Table 5: EMCs for urban land use 14
Table 6: Impervious percentages used for the various land use types 14
Table 7: Urban runoff coefficients derived for the Norfolk nutrient budget calculator 15
Table 8: Summary comparison of key inputs 18

Table of Figures

Figure 1: Surface water catchment map 5

Figure 2: Nutrient neutrality flow diagram 6

1.1 Introduction

1.1.1 Evidence-based approach

The Norfolk nutrient budget calculator is a regional specific tool designed to rapidly calculate the nutrient loading from new residential development in the catchments of the River Wensum SAC and the Broads SAC. This report presents the methods, principles and key assumptions on which the calculator is based.

The Norfolk nutrient budget calculator utilises the best available scientific evidence and research alongside the latest nutrient neutrality guidance from Natural England (2022). The calculator adopts a regional specific and accurate approach. As a result, some of the calculator inputs and assumptions deviate from those advised in the published guidance. The evidence to support these deviations is presented within this report.

Whilst the best available evidence and research was used, some inputs are based on professional judgement and the values used are subject to a degree of uncertainty. As such, a precautionary approach was applied in line with existing legislation and case law. Furthermore, a precautionary buffer is added to the total nutrient loading values for developments. Applying a precautionary approach provides reasonable certainty to the local planning authority that the development, in combination with other developments, will avoid significant increases in nutrient loading to the designated sites.

Under the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) (herein referred to as the Habitats Regulations), a Habitats Regulations assessment must remove all reasonable scientific doubt as to the absence of adverse effects on a habitats site. However, absolute certainty is not required. In order to meet the requirements, scientific evidence was used instead of generic assumptions where possible.

1.1.2 Use of the calculator

The calculator is only applicable to developments that impact the River Wensum SAC and/or Broads SAC site or any water body that subsequently discharges into these sites. **Figure 1** presents the surface water catchment area that will impact nutrient contributions to the designated sites. **Appendix 1** provides a full list of the Water Recycling Centres (WRCs) that discharge into the surface drainage network upstream of the designated sites and could therefore supply nutrients to them. For any development proposals that would be located outside of the defined surface water catchment area, but would discharge effluent to a WRC within the surface water catchment, stages 2 and 3 do not apply. No assessment is necessary for any development proposals that would drain to a WRC that discharges outside of the surface water catchment.

The methodology applies to all developments that could result in a net increase in population, such as new homes, student accommodation, tourist attractions and tourist accommodation as these developments would have wastewater implications. Commercial developments are not typically included, as it is assumed that people working in a commercial building will live within the same catchment and the wastewater implications of the individuals are considered when assessing housing. Assessing both housing and commercial developments could therefore lead to ‘double-counting’.

Figure 2 presents a flow diagram for the application of the methodology used in the Norfolk nutrient budget calculator. Details of each stage are presented below.

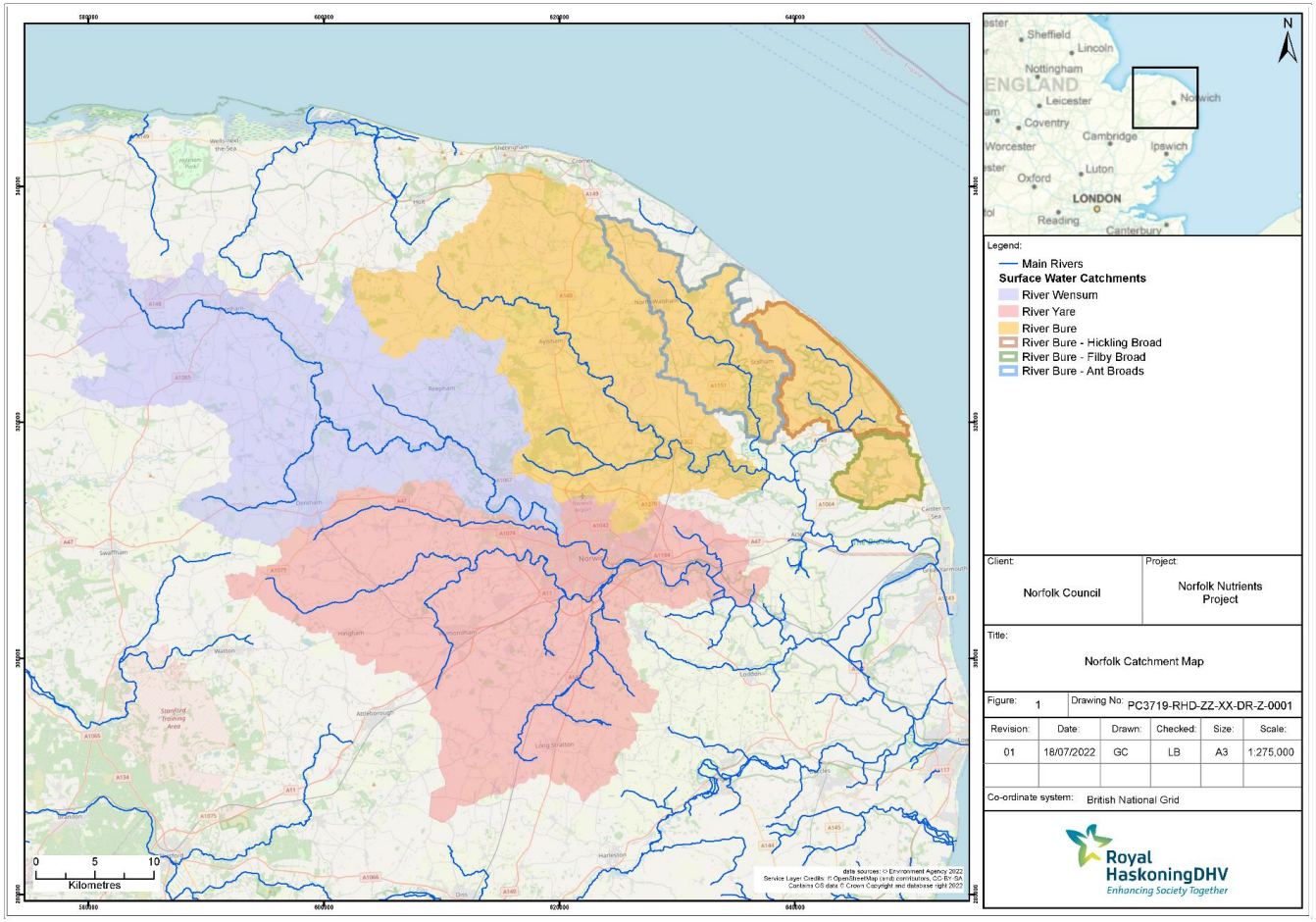

Figure 1: *Surface water catchment map*

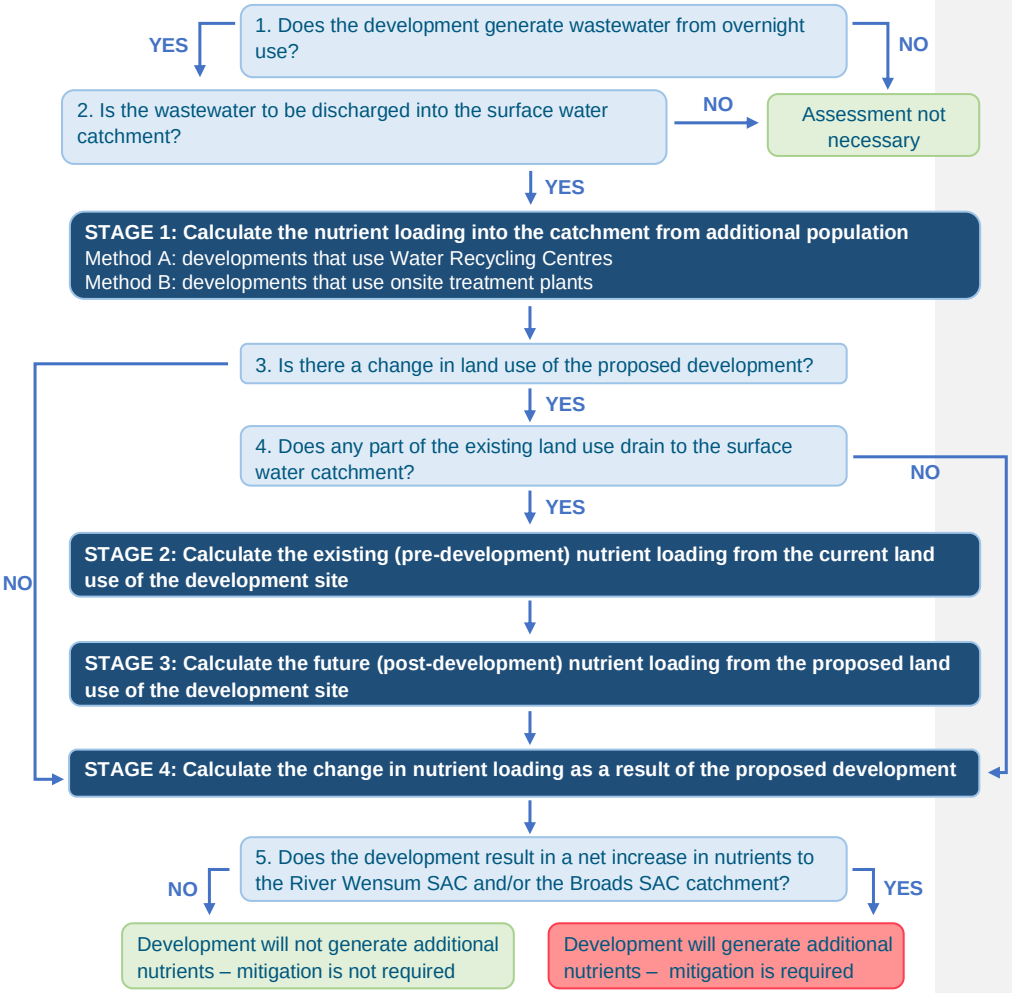

Figure 2: *Nutrient neutrality flow diagram*

1.2 Stage 1: Calculate nutrient loading from additional wastewater

1.2.1 Stage 1 methodology

Nutrient loading is calculated by multiplying the number of proposed dwellings by the assumed occupancy rate (persons/dwelling) to calculate the population increase from the development. This is then multiplied by the water usage (l/person/day) and the effluent discharge concentration (mg/l) to calculate the nutrient loading, which is converted into kg/yr.

$$\boldsymbol{No.of\ dwellings \times Occupancy\ rate\ = P_i} \qquad \textit{Eq. 1}$$

Where $\boldsymbol{P_i}$ represents the population increase.

$$\boldsymbol{P_i \times Water\ usage = W\ (Litres\ per\ day)} \qquad \textit{Eq. 2}$$

Where $\boldsymbol{W}$ the wastewater volume generated.

$$\boldsymbol{W \times (WRC\ discharge\ level) = L_w\ (mg\ per\ day)} \qquad \textit{Eq. 3}$$

$$\boldsymbol{\frac{Nutrient\ load}{1000000} \times 365\ = L_w(kg\ per\ year)} \qquad \textit{Eq. 4}$$

Where L_w represents the loading from wastewater.

1.2.2 Average occupancy rates

The current Natural England nutrient neutrality guidance (2022) derives average housing occupancy rates by considering the total population within a catchment against the total number of dwellings. This housing rate is then applied to all new developments within the catchment. This approach assumes that all new dwellings will result in an increase in the population within the catchment and ignores the fact that new dwellings will often by occupied by people who are already living within the catchment (and therefore already contributing to wastewater).

A more robust method of calculating the actual population change from new developments was used and a Norfolk specific occupancy rate of 1.89 persons/dwelling was derived (ORS, 2022). This value accounts for people moving within catchments and the impact of second homes / holiday homes.

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This Norfolk average occupancy rate is applied to all residential dwellings within the catchment, regardless of the number of bedrooms. This consistent approach reduces the risk of underestimating or overestimating the total occupancy levels across the catchment. However, the Norfolk average occupancy rate is not appropriate for development types such as student accommodation or houses in multiple occupation, which are not included in the ONS data. In this case, an average occupancy of 1.65 persons/dwelling, derived from the Dorset Heathlands SPD (Dorset Council, 2020), is applied to additional rooms above 6 residents. The Dorset Heathlands SPD provides the best alternative estimate and is considered to be appropriate for use outside of Dorset.

In the case of hotels or guest houses, an average occupancy of 1.65 persons/dwelling is also assumed, alongside estimations on the number of weeks open per year (1-52) and typical occupancy (1-100%) which are applied as multipliers. Accounting for the number of weeks open and typical occupancy allows for the most accurate determination of the wastewater volume that will be produced by the development.

In the case of single bedroom student halls, bespoke occupancy rates should be agreed with the relevant Local Planning Authority.

1.2.3 Water usage per person

The optional higher Building Regulations standard for water use per person of 110 litres/person/day is used within the calculator by default. When developments are built to 110 l/person/day, this value should be secured by the Local Planning Authority through a planning condition. However, the cells remains open and the user can choose to apply the Building Regulations legal maximum water use per person standard of 125 litres/person/day or a water use per person standard that is even greater than the optional higher standard.

Natural England nutrient neutrality guidance (2022) indicates that an additional 10 litres per person per day should be applied to the chosen water usage standard to account for potential changes to less water efficient fittings throughout the lifetime of the development. However, there is evidence in the literature to suggest that water usage per person per day does not increase over time. As such, this assumption was not adopted in the Norfolk nutrient budget calculator. For example, a recent report by Waterwise (2018) indicates that customer perception on water efficient fittings is positive, with 42% feeling that efficient showerheads and taps would perform the same and 39% thinking that they perform better than less efficient products. Furthermore, a recent Ofwat study found that it is possible to achieve average household consumptions of 50-70 litres per person per day in 50 years, without a reduction in the level of utility or quality of water use. Andrewartha and Scott (2018) found that the average water usage in properties built to a standard of 125 litres/person/day is actually 113.7 litres/person/day.

The Norfolk Nutrient budget calculator uses a default value of 110 l/person/day within the calculator and does not apply an additional 10 l/person/day as per Natural England guidance.

1.2.4 Wastewater discharge concentrations

1.2.4.1 Water Recycling Centre

In order to calculate the nutrient contribution from wastewater, an estimate is made on the nutrient concentrations in the treated wastewater generated by the new development. Wastewater from a new development is preferably treated at a mains water recycling centre (WRC), where nutrients are removed by treatment processes. Some WRCs have dedicated nutrient removal processes and the final effluent concentrations will comply with permitted concentrations. Other WRCs, usually more rural, will not have a permitted limit on the concentration of final effluent discharges.

Permitted WRCs are operated so that they have some headroom between the final effluent concentrations and the level that has to be met for compliance with the permit. This is to ensure that WRCs will remain compliant with their permits as well as to provide water quality benefits. Where a permit limit is set to decrease, water companies will sometimes operate at this lower concentration in advance of the permit changes. Natural England's guidance assumes that WRC discharge at 90% of their permit limit, and as such apply a multiplier of 0.9 to the permit limit. This makes a general assumption on the average discharge concentrations, which is likely to vary between each WRC, and typically represents an overestimation on the actual discharge concentrations in the final effluent from the WRCs.

A more catchment specific and evidence-based approach is to use measured discharge concentrations from the WRC within the catchment that operate under permit limits. However, due to potential future changes (either increases or decreases) in the discharge concentration, a precautionary approach was adopted which assumes that the WRCs discharge at one standard deviation[1] from the mean.

[1] *Standard deviation is a statistic that measures the dispersion of a dataset relative to its mean. This is calculated as the square root of the variance using the formula* $\sigma = \sqrt{\frac{1}{N}\sum_{i=1}^{N}(X_i - \mu)^2}$ Where σ is the standard deviation, μ is the mean average, N is the sample size and X the observed values. A low standard deviation indicates the values tend to be close to the mean, while a high standard deviation indicates the values are spread out over a wider range. Under a normal distribution (i.e. bell-shaped curve), one standard deviation away from the mean in either direction account for 68.2% of the values.

The suitability of the standard deviation approach as a precautionary buffer was assessed by considering the % increase in flow (m^3/day) as a result of projected growth at each permitted WRC. Where a WRC will see a flow increase of greater than 10%, it was assumed that this was significant growth and a further buffer was required on top of the standard deviation. The WRCs in this case were therefore assumed to operate at 90% of their permit. This approach ensures that future growth is considered without underestimating the wastewater loading. For the WRCs without sufficient data, the typical standard deviation discharge of 76% was applied to the permitted concentration.

The discharge concentration data was supplied by Anglian Water Services and ranges from January 2019 to June 2022. In order to ensure the calculator remains up to date with measured concentrations, a review of the measured data should be conducted at regular intervals and the calculator updated to reflect any changes. The calculator, at the time of completing the Habitats Regulations Assessment will represent the best available evidence at that time. Regularly reviewing the discharge concentration data ensures that is still the case going forward.

The calculator also incorporates post 2025 (Asset Management Plan (AMP) 7) and Post 2030 (AMP 8) discharge concentrations. Where the permit limit is not changing post 2025, the same discharge concentrations were assumed. Where the permit limit is changing (Aylsham, Southrepps and Swardeston) it was assumed that the WRC would operate at 90% of its updated permit limit. This will be reviewed once there is sufficient evidence regarding the post-2025 performance.

A statement from the Department for Levelling Up, Housing & Communities (21st July 2022) indicates that there will be a statutory obligation on Anglian Water to operate WRCs at the Technically Achievable Limit (TAL) within the catchment by 2030. The TAL is 0.25mg/l for Total Phosphorus (TP) and 10mg/l for Total Nitrogen (TN). The government will table an amendment to the Levelling Up and Regeneration Bill (LURB) which gives confidence that the upgrades will be in place by 2030 and enabling the use of the lower permit limits as part of a Habitats Regulations Assessment. The calculator adopts these new lower permit limits. However, due to a lack of data on performance at these significantly reduced limits, the calculator assumes the discharge concentrations would be at 90% of the permits.

Natural England guidance indicates that standard concentrations of 8 mg/l for TP and 27 mg/l for TN should be assumed for unpermitted WRCs. However, catchment specific default values are used within the Norfolk nutrient budget calculator of 6 mg/l TP and 25 mg/l TN.. These are the values used in Environment Agency WRC modelling of nutrient inputs from WRCs in Norfolk and represent the most locally relevant default values.

Table 1 presents the WRC concentrations used within the Norfolk nutrient budget calculator for the permitted sites. A full list of WRCs and their assumed discharge concentrations are provided in **Appendix A1**.

Table 1: *Measured discharge concentrations of permitted WRCs*

WRC	Permitted P limit (mg/l)	Assumed P concentration (mg/l)	Discharge %	Assumption applied
Aldborough	2	1.57	79	STDEV
Aylsham	1	0.9	72	Significant growth
Aylsham (post 2025)	0.6	0.54	76	90% of future permit
Belaugh	1	1.05	105	STDEV
Briston	1	0.69	69	STDEV
Bylaugh	2.5	1.89	76	STDEV
Coltishall	1	0.86	86	STDEV

WRC	Permitted P limit (mg/l)	Assumed P concentration (mg/l)	Discharge %	Assumption applied
Dereham	1	0.76	76	STDEV
Fakenham	1	0.9	69	Significant growth
Foulsham	1	0.89	89	STDEV
Long Stratton	1	0.74	74	STDEV
Ludham	1	0.67	67	STDEV
North Elham	1	0.62	62	STDEV
Rackheath	2	1.8	75	Significant growth
Reepham	1	0.83	83	STDEV
Roughton	2	1.34	67	STDEV
Sculthorpe	1	0.65	65	STDEV
Southrepps	3	2.28	76	Average discharge applied
Southrepps (post 2025)	0.5	0.45	76	90% of future permit
Stalham	1	0.86	86	STDEV
Swanton Morley	2	1.52	76	Average discharge applied
Swardeston (post 2025)	0.4	0.36	76	90% of future permit
Whitlingham	1	0.9	76	Significant growth
Wymondham	0.8	0.61	76	STDEV

1.2.5 On-site treatment plant

The Norfolk nutrient budget calculator adopts default discharge concentrations for TP and TN from Package Treatment Plants (PTPs) and Septic Tanks (STs) from the Natural England nutrient neutrality guidance (Natural England, 2022). Additionally, the Norfolk nutrient budget calculator also includes the option to select a ST serving multiple properties with a discharge concentration of 7mg/l TP (May and Woods, 2016). The default values used within the calculator are presented in **Table 2**.

Table 2: *Default onsite treatment plants effluent concentrations*

Treatment type	P removal (mg/l)	N removal (mg/l)
Default package treatment plant	9.7	72.9
Default multi-source septic tank	7	96.3
Default single-source septic tank	11.6	96.3

1.3 Stage 2 & 3: Calculate nutrient loading from land use

1.3.1 Stage 2 & 3 methodology

In order to calculate the net change in land use, the existing nutrient input from the current land within the proposed development footprint needs to be calculated. The nutrient input is calculated by multiplying the runoff coefficient for each specific land use type by the relevant area of each land use.

$$(\boldsymbol{A_1} \times \boldsymbol{C_1}) + (\boldsymbol{A_2} \times \boldsymbol{C_2}) \ldots + (\boldsymbol{A_n} \times \boldsymbol{C_n}) = \boldsymbol{L_{current}} \qquad Eq.\ 5$$

*Where **A** represents the Area in hectares, **C** the export coefficient and $L_{current}$ the nutrient load from the current land uses.*

Where land does not drain to the designated site surface water catchment it should be excluded from the calculation in Stages 2 and 3.

The nutrient load from the future land uses ($L_{proposed}$) utilises the same calculations as Equation 5.

1.3.2 Rainfall data

The rainfall data used within the Norfolk nutrient budget calculator differs from that used within the Natural England guidance. Rainfall data used within the Norfolk nutrient budget calculator for the catchment was derived from HadUK gridded which provided Standard Average Annual Rainfall (SAAR) for the period 2001-2021. This data provides the best available evidence for which to base the land use runoff coefficients. The HadUk data provides a more up to date dataset than the data proposed by Natural England which was collected between 1961 – 1990.

1.3.3 Agricultural runoff coefficients

The Norfolk nutrient budget calculator employs the same methodology for deriving agricultural runoff coefficients as the Natural England guidance. TP and TN runoff coefficients (in kg/ha/yr) were derived using Farmscoper V5 (ADAS, 2022). The Upscale tool was used which derived runoff coefficients specific to the operational catchments of the Wensum, Yare and Bure as well as the Broadland Rivers Management catchment. Operational catchment values were used where possible. In the absence of operational catchment values, management catchment data was used. The agricultural runoff coefficients were modified to account for pollution incidents and illegal operations. Agricultural runoff coefficients for each operational catchment are provided in **Appendix A2**.

The agricultural runoff rates are dependent on the following:

- Farm type
- Operational catchment
- Soil types
- Average annual rainfall
- Whether the development is in a Nitrate Vulnerable Zone (NVZ)

Soil types are derived from Soilscapes (Cranfield Soil and Agrifood Institute, 2022) and characterised into the following drainage categories to conform with the Farmscoper (**Table 3**). This is consistent with the approach outlined by Natural England (2022).

Table 3: *Soil types by drainage category*

Free draining			Impermeable - drained for arable			Impermeable - drained for arable and grassland		
Colour	ID	Name	Colour	ID	Name	Colour	ID	Name
	3	Shallow lime-rich soils over chalk or limestone		1	Saltmarsh soils		17	Slowly permeable seasonally wet acid loamy and clayey soils
	4	Sand dune soils		2	Shallow very acid peaty soils over rock		18	Slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils
	5	Freely draining lime-rich loamy soils		8	Slightly acid loamy and clayey soils with impeded drainage		19	Slowly permeable wet very acid upland soils with a peaty surface
	6	Freely draining slightly acid loamy soils		9	Lime-rich loamy and clayey soils with impeded drainage			
	7	Freely draining slightly acid but base-rich soils		15	Naturally wet very acid sandy and loamy soils			
	10	Freely draining slightly acid sandy soils		16	Very acid loamy upland soils with a wet peaty surface			
	11	Freely draining sandy Breckland soils		20	Loamy and clayey floodplain soils with naturally high groundwater			
	12	Freely draining floodplain soils		21	Loamy and clayey soils of coastal flats with naturally high groundwater			
	13	Freely draining acid loamy soils over rock		22	Loamy soils with naturally high groundwater			
	14	Freely draining very acid sandy and loamy soils		23	Loamy and sandy soils with naturally high groundwater and a peaty surface			
				24	Restored soils mostly from quarry and opencast spoil			
				25	Blanket bog peat soils			
				26	Raised bog peat soils			
				27	Fen peat soils			

The Farmscoper Upscale tool uses existing data on operating farms within a catchment to predict the average runoff coefficients. The Farmscoper upscale tool does not contain data on farms within the catchment with a rainfall of less than 600 mm/yr. As a result, runoff coefficients derived for 600 – 700 mm/yr rainfall were also applied to the runoff coefficients between 500 – 600 mm/yr.

Allotments and community food growing land are derived using agricultural land export coefficients in line with the Natural England guidance (2022).

1.3.4 Non-agricultural land runoff coefficients

Non-agricultural land use coefficients were adopted from Natural England's nutrient neutrality guidance (2022) (**Table 4**). The Norfolk nutrient budget calculator also includes the option not select constructed wetlands as a land use. The Norfolk nutrient budget calculator uses default values for constructed wetlands that is intended to be used for guidance proposes only to provide the user with an indication of the likely area required. The default values were derived from expert opinion and literature (Land et al., 2016).

***Table 4**: Non-agricultural land runoff coefficients*

Land Use classification	P runoff coefficient (kg/ha/yr)	N runoff coefficient (kg/ha/yr)
Greenspace	0.02	3
Woodland	0.02	3
Shrub / heathland / bracken / bog	0.02	3
Water	0.00	0
Constructed wetland	-8.00	-930
Set aside Land	0.02	3

1.3.5 Urban land runoff coefficients

The derivation of urban land use runoff coefficients is primarily based on Natural England's nutrient neutrality guidance (2022) and does not deviate from the proposed method (HR Wallingford Modified Rational Method). The urban land is categorised into residential, open urban and commercial/industrial land. The Norfolk nutrient budget calculator further sub-divides residential land into high-density, medium-density and low-density.. This allows for more specific land use types to be selected, increasing the accuracy of the calculator and limits the potential for overestimations or underestimations. The following definitions are used:

- High density residential - applies to urban cores (e.g. city centres)
- Medium density residential - applies to development in larger towns where there is a high percentage of development, but outside of core cities.
- Low density residential – rural developments

The HR Wallingford Modified Rational Method was used to calculate the nutrient loading:

$$L = R \times P_r \qquad Eq.\ 6$$

Where L is the average runoff (mm/yr), R is the average rainfall (mm/yr) and P_r is the percentage runoff (%)

The percentage runoff was calculated using the following equation:

$$P_r = 0.829 \times PIMP + 0.078 \times U - 20.7 \qquad Eq.\ 7$$

Where $PIMP$ is the percentage of land that is impervious (%) and U is the catchment wetness index.

The catchment wetness index is calculated using the following equation:

$$U = -129.5 + (0.424 \times R) - (2.28 \times 10^{-4} \times R^2) - (4.56 \times 10^{-8} \times R^3) \qquad Eq.\ 8$$

Eq. 6 is combined with Event Mean Concentrations (EMCs) to calculate the urban runoff coefficients. The EMCs outlined in the Natural England nutrient neutrality guidance (2022) were adopted and are derived from Mitchel (2005). The EMCs used within calculations are presented in **Table 5**.

Table 5: *EMCs for urban land use*

Land use	P EMC (mg/l)	N EMC (mg/l)
Residential	2.85	0.41
Commercial / Industrial	1.52	0.30
Open urban land	1.68	0.22

The percentage of land that is impervious in selected urban land uses was derived from the available literature[2], and represents the average of reported mean values stated. Where a range of values was provided, the upper limits were taken in order to adopt a precautionary approach. To account for how nitrogen is more readily transported in the environment, an additional 20% was added to the TN impervious values. **Table 6** presents the impervious percentages used to derive urban land use runoff coefficients.

Table 6: *Impervious percentages used for the various land use types*

Land use	TP imperviousness (%)	TN imperviousness (%)
High density residential	61	81
Medium density residential	38	58
Low density residential	30	50
Commercial / Industrial	84	100
Open space urban	22	42

The literature values are further supported by measured data from ongoing projects within the catchment, which shows that land classified as either high density or medium density urban has a typical impervious cover of 45-50%.

Table 7 presents the urban runoff coefficients used with the calculator.

[2] *Exum et al., (2005); Cappiela & Brown (2001); Chormanski et al., (2008); Lu & Weng (2006); Yancey (2008); Yang & Liu (2005); Wu & Murray (2003); Xu et al., (2018); Ferguson (1998); Jiang & Fu (2015); Boyd et al., (1993); New York State Department of Environmental Conservation (2015); Tilley & Slonecker (2006); ENSR (2005); Shahtahmassebi et al., (2018); National Land Cover Data (1992)*

Table 7: *Urban runoff coefficients derived for the Norfolk nutrient budget calculator*

Rainfall band (mm/yr)	Midpoint (mm/yr)	Catchment wetness (U)	High density residential		Medium density residential		Low density residential		Commercial / Industrial		Urban open space	
			TP	TN	TP	TN	TP	TN	TP	TN	TP	TN
550-575	562.55	28.75	0.74	7.81	0.30	4.75	0.15	3.69	0.86	5.51	0.00	1.55
575-600	587.55	31.66	0.78	8.19	0.32	5.00	0.16	3.89	0.91	5.78	0.00	1.64
600-625	612.55	34.19	0.82	8.57	0.34	5.25	0.17	4.09	0.95	6.04	0.00	1.73
625-650	637.55	36.33	0.85	8.95	0.36	5.49	0.18	4.29	0.99	6.30	0.01	1.82
650-675	662.55	38.07	0.89	9.33	0.37	5.73	0.19	4.48	1.03	6.56	0.01	1.90
675-700	687.55	39.42	0.93	9.70	0.39	5.97	0.20	4.67	1.07	6.82	0.01	1.99
700-750	725.05	40.68	0.98	10.25	0.42	6.31	0.22	4.94	1.13	7.20	0.01	2.11
750-800	775.05	41.00	1.05	10.97	0.44	6.75	0.23	5.29	1.21	7.70	0.01	2.25
800-850	825.05	41.00	1.12	11.67	0.47	7.19	0.25	5.63	1.29	8.20	0.01	2.40
850-900	875.05	41.00	1.19	12.38	0.50	7.63	0.26	5.97	1.37	8.70	0.01	2.55

1.4 Stage 4: Calculating the nutrient budget

1.4.1 Stage 4 methodology

Stage 4 calculates the net change in the nutrient loading to the catchment as a whole due to the proposed development. This is calculated by summing the additional nutrients from wastewater (stage 1) and the difference between the nutrient load for the future (stage 3) and current land uses (stage 2). A precautionary buffer is then applied.

$$\boldsymbol{Total\ nutrient\ loading} = \mathbf{1.2} \times (\boldsymbol{L_W} + (\boldsymbol{L_{Proposed}} - \boldsymbol{L_{Current}})) \qquad \textit{Eq. 9}$$

1.4.2 Precautionary buffer

Whilst the figures used throughout this model are based on scientific research and evidence and represent the best available evidence, there is some inherent uncertainty remaining. A precautionary buffer is used to recognise the uncertainty and provide, with reasonable certainty, that there will be no adverse effect on the integrity of the designated sites. As per Natural England guidance (2022), a 20% precautionary buffer is added to the total loading value.

1.5 Mitigation

The Norfolk nutrient budget calculator goes beyond the Natural England guidance and provides an indication of potential mitigation options. The mitigation tabs offer guidance on the change in land use that is required in order to achieve nutrient neutrality. The stages only apply to developments that will generate additional nutrients as outlined in Stage 4. The different tabs reflect the different mitigation requirements from reduction in permit limits. The mitigation tabs offer the option to implement either on-site or off-site.

1.5.1 Mitigation methodology

In the case of off-site mitigation, the excess nutrients as a result of the proposed development must equal the change in land use of the mitigation area.

$$\boldsymbol{Total\ nutrient\ loading} = (\boldsymbol{L_{Mitigationproposed}} - \boldsymbol{L_{mitigationCurrent}}) \qquad \textit{Eq. 10}$$

Where $\boldsymbol{L_{Mitigationproposed}}$ is the total nutrient loading from the proposed land use of the mitigation area and $\boldsymbol{L_{Mitigationcurrent}}$ is the total nutrient loading from the current land use of the mitigation area.

Only land that is currently within the surface water catchment and may affect the designated sites, either by draining directly and draining to upstream locations, can be selected for mitigation land.

1.6 Zero-value calculator

The zero-value calculator is an additional feature included within the Norfolk nutrient budget calculator. The zero-value calculator shows the number of developments that can be built and occupied as a result of taking the entire development site out of agricultural use and partly into low-input use (e.g. semi-natural grassland) and a small part of the future use. This allows part of the development to progress and prevents delays while mitigation solutions are implemented. The calculator generates the number of properties that can be built for both TP and TN. Unless the difference in short-term mitigation can be sourced off-site, the lower number of dwellings applies.

1.6.1 Zero-value calculator methodology

The development will be 'zero value' or nutrient neutral when the wastewater contribution from the development is equal to the nutrient load from the land use change. In this case the precautionary buffer is not required because the value is not above zero.

$$L_W = ((L_{Proposed} + L_{low-input}) - L_{Current}))$$ *Eq. 11*

In order to calculate the maximum number of dwellings that could be permitted whilst remaining nutrient neutral, the permitted nutrient loading from wastewater that is neutral follows the opposite calculations to those in Stage 1.

$$\frac{L_W}{365} \times 1000000 = L_w$$ *Eq. 12*

$$\frac{L_w}{WRC\ discharge\ level} = W$$ *Eq. 13*

$$\frac{W}{water\ usage} = P_i$$ *Eq. 14*

$$\frac{P_i}{occupancy\ rate} = No.\ of\ dwellings$$ *Eq. 15*

1.7 Summary

Table 8 below provides a summary of the key inputs and how these differ between the Natural England guidance and the Norfolk nutrient budget calculator.

Table 8: *Summary comparison of key inputs*

Calculator input	Natural England guidance	Norfolk nutrient budget calculator	Comment
Occupancy rate	2.4 persons/dwelling	1.89 persons/dwelling residential development	Use of regional specific value for Norfolk that accounts for movement of people already living within the catchment.
	Not included	1.65 persons/dwelling for houses in multiple occupation and hotels.	Provides more accurate estimation of wastewater volume from specific development types
Water usage	120 l/person/day	110 l/person/day	Use of 110/l/person/day as this is secured through policy
WRC P discharge concentrations	At 90% of permit limit for permitted sites 8 mg/l for unpermitted sites	Use of one standard deviation from the mean. WRC with significant growth use 90% of permit. 6 mg/l for unpermitted sites	Use of measured data rather than generalised assumptions for permitted sites. Use of regional specific default values used by Environment Agency.
WRC N discharge concentrations	27 mg/l	25 mg/l	Use of regional specific default values used by Environment Agency.
Onsite treatment plants	Default values used for PTP and ST from literature review	Default values used for PTP and ST from literature review. Addition of option to include STs serving multiple dwellings.	No difference in default values.
Rainfall	1961 – 1990 SAAR data	2001 – 2021 SAAR data	Use of more up to date data
Agricultural runoff rates	Derived using Farmscoper upscale model	Derived using Farmscoper upscale model	No difference in approach
Non-agricultural runoff rates	Default values derived from literature review	Default values derived from literature review	No difference in approach

Urban runoff coefficients	Derived using HR Wallingford Modified Rational Method. Default EMCs used from Mitchell (2005) and generic impervious values of 80% for P and 100% for N. Option of only residential land use.	Derived using HR Wallingford Modified Rational Method. Default EMCs used from Mitchell (2005) and impervious values derived from detailed literature review and catchment specific data. Option of high, medium and low density residential land use types.	Use of catchment specific data and adoption of values following detailed literature review, as opposed to generic assumptions. Use of more detailed land use types to improve accuracy of urban runoff coefficients.
Precautionary buffer	20%	20%	No difference in approach
Mitigation	Not included	Included	N/A
Zero-value calculator	Not included	Included	N/A

1.8 References

Agricultural Development and Advisory Service. (2022). Farmscoper Version 5.

Andrewartha, T. and Scott, R. (2018). Building Regulations Part G Analysis of Water Consumption, Essex and Suffolk Water

Boyd, M.J., Bufill, m.C., Knee, R.M. (1993). Pervious and impervious runoff in urban catchments, Hydrological Sciences Journal, 38:6, 463-478.

Cappiela, K. & Brown, K. (2001). Impervious Cover and Land Use in the Chesapeake Bay Watershed.

Chormanski, J., Van de Voorde, T., De Roeck, T., Batelaan, O., Canters, F. (2008). Improving Distributed Runoff Prediction in Urbanized Catchments with Remote Sensing based Estimates of Impervious Surface Cover.

Cranfield Soil and Agri-food Institute (2022). Soilscapes.

Dorset Council. (2020). The Dorset Heathlands Planning Framework 2020-2025: Supplementary Planning Document.

ENSR (2005). Pilot TMDL Applications using the Impervious Cover Method.

Exum, L., Bird, S., Harrison, J., Perkins, C.A. (2005). Estimating and Projecting Impervious Cover in the Southeastern United States. US Environmental Protection Agency.

Ferguson, B.K. (1998). Introduction to Stormwater: Concept, Purpose, Design. New York: John Wiley & Sons.

Jiang, Y. & Fu, P. (2015). Assessing the Impacts of Urbanization-Associated Land Use/Cover Change on Land Surface Temperature and Surface Moisture: A Case Study in the Midwestern United States. *Remote Sensing*.

Land, M., Graneli, W., Grimvall, A., Hoffman, C., Mitsch, W., Tonderski, K., Verhoeven, J. (2016). How effective are created or restored freshwater wetlands for nitrogen and phosphorus removal? A systematic review. *Environ Evid*, 5:9

Lu, D. & Weng, Q. (2006). Use of impervious surface in urban land-use classification. *Remote Sensing of Environment*, 102, 146-160.

May, L. & Woods, H. (2016). Phosphorous in Package Treatment Plant effluents. *Natural England Commissioned Reports*, Number221.

Mitchell, G. (2005). Mapping hazard from urban non-point pollution: A screening model to support sustainable urban drainage planning. Journal of Environmental Management, 74(1), pp. 1-9.

National Land Cover Data (1992)

Natural England. (2020). Advice on Nutrient Neutrality for New Development in the Stour Catchment in Relation to Stodmarsh Designated Sites – For Local Planning Authorities. Final Version Report.

Natural England. (2022). Nutrient Neutrality Generic Methodology.

New York State Department of Environmental Conservation. (2015). The New York State Stormwater Management Design Manual: Appendix A.1 Pollutant Concentrations.

Shahtahmassebi, A, R., Wu, C., Blackburn, G.A,. Zheng, Q., Huang, L., Shortridge, A., Shahtahmassebi, G., Jiang, R., He, S., Wang, K., Lin, Y., Clarke, K.C., Su, Y., Lin, L., Wu, J., Zheng, Q., Xu, H., Xue, X., Shen, Z. (2018). How do modern transportation projects impact on development of impervious surfaces via new urban area and urban intensification? Evidence from Hangzhou Bay Bridge, China. *Land Use Policy*, Volume 77, 479-497.

Tilley, J.S., & Slonecker, E.T. (2006). Quantifying the Components of Impervious Surfaces: U.S. Geological Survey Open-File Report 2006-1008, 33.

Waterwise. (2018) Advice on water efficient new homes for England.

Wu, C. & Murray, A.T. (2003). Estimating impervious surface distribution by spectral mixture analysis. *Remote Sensing of Environment*, 84, 493 – 505.

Xu, R., Liu, J., Xu, J. (2018). Extraction of High-Precision Urban Impervious Surfaces from Sentinel-2 Multispectral Imagery via Modified Linear Spectral Mixture Analysis. *Sensors*, 18, 2873.

Yancey, K. (2008). Impervious Surface Coefficients: A tool for environmental analysis and management.

Yang, X. & Liu, Z. (2005). Use of satellite-derived landscape imperviousness index to characterize urban spatial growth. *Computers, Environment and Urban Systems*, 29, 524–540

A1 Appendix A1: Water Recycling Centre discharge concentrations

Water Recycling centres	Current TP discharge concentration (mg/l)	Post-2025 TP discharge concentration (mg/l)	Post-2030 TP discharge concentration (mg/l)	Current TN discharge concentration (mg/l)	Post-2030 TN permit limit (mg/l)
Aldborough Water Recycling Centre	1.57	1.57	0.23	25.0	9.00
Ashmanaugh	6.00	6.00	0.23	25.0	9.00
Ashwellthorpe Water Recycling Centre	6.00	6.00	0.23	25.0	9.00
Aylsham Water Recycling Centre	0.90	0.54	0.23	25.0	9.00
Barford Water Recycling Centre	6.00	6.00	0.23	25.0	9.00
Barnham Broom Water Recycling Centre	6.00	6.00	0.23	25.0	9.00
Barton Turf	6.00	6.00	0.23	25.0	9.00
Belaugh Water Recycling Centre	1.05	1.05	0.23	25.0	9.00
Billingford STW	6.00	6.00	0.23	25.0	9.00
Bircham Newton (Monks Close) WRC	6.00	6.00	0.23	25.0	9.00
Brisley	6.00	6.00	0.23	25.0	9.00
Briston Water Recycling Centre	0.69	0.69	0.23	25.0	9.00
Bunwell STW	6.00	6.00	0.23	25.0	9.00
Bylaugh Water Recycling Centre	1.89	1.89	0.23	25.0	9.00
Carleton Rode Church Road	6.00	6.00	0.23	25.0	9.00
Carleton Rode STW	6.00	6.00	0.23	25.0	9.00
Coltishall STW	0.86	0.86	0.23	25.0	9.00
Corpusty STW	6.00	6.00	0.23	25.0	9.00
Cranworth STW	6.00	6.00	0.23	25.0	9.00

Water Recycling centres	Current TP discharge concentration (mg/l)	Post-2025 TP discharge concentration (mg/l)	Post-2030 TP discharge concentration (mg/l)	Current TN discharge concentration (mg/l)	Post-2030 TN permit limit (mg/l)
Deopham STW	6.00	6.00	0.23	25.0	9.00
Dereham WRC	0.76	0.76	0.23	25.0	9.00
East Bilney STW	6.00	6.00	0.23	25.0	9.00
East Carleton - Wymondham Road STW	6.00	6.00	0.23	25.0	9.00
East Ruston STW	6.00	6.00	0.23	25.0	9.00
Fakenham (Old And New) WRC	0.90	0.90	0.23	25.0	9.00
Felmingham Water Recycling Centre	6.00	6.00	0.23	25.0	9.00
Forncett End STW	6.00	6.00	0.23	25.0	9.00
Forncett St. Peter STW	6.00	6.00	0.23	25.0	9.00
Foulsham Water Recycling Centre	0.89	0.89	0.23	25.0	9.00
Fritton School Lane STW	6.00	6.00	0.23	25.0	9.00
Fundenhall STW	6.00	6.00	0.23	25.0	9.00
Garvestone Reymerston Road STW	6.00	6.00	0.23	25.0	9.00
Garvestone, Dereham Road	6.00	6.00	0.23	25.0	9.00
Gateley STW	6.00	6.00	0.23	25.0	9.00
Great Melton STW	6.00	6.00	0.23	25.0	9.00
Gresham STW	6.00	6.00	0.23	25.0	9.00
Hardwick STW	6.00	6.00	0.23	25.0	9.00
Hempnall Water Recycling Centre	6.00	6.00	0.23	25.0	9.00
Hempnell - Silver Green STW	6.00	6.00	0.23	25.0	9.00
Hindolveston Church Lane	6.00	6.00	0.23	25.0	9.00

Water Recycling centres	Current TP discharge concentration (mg/l)	Post-2025 TP discharge concentration (mg/l)	Post-2030 TP discharge concentration (mg/l)	Current TN discharge concentration (mg/l)	Post-2030 TN permit limit (mg/l)
Hindolveston STW	6.00	6.00	0.23	25.0	9.00
Hockering STW	6.00	6.00	0.23	25.0	9.00
Horningtoft	6.00	6.00	0.23	25.0	9.00
Horsey - Bensleys Close STW	6.00	6.00	0.23	25.0	9.00
Honing STW	6.00	6.00	0.23	25.0	9.00
Little Fransham Crown Lane STW	6.00	6.00	0.23	25.0	9.00
Little Fransham Glebe STW	6.00	6.00	0.23	25.0	9.00
Long Stratton WRC	0.74	0.74	0.23	25.0	9.00
Mattishall STW	6.00	6.00	0.23	25.0	9.00
North Elmham STW	0.62	0.62	0.23	25.0	9.00
North Tuddenham STW	6.00	6.00	0.23	25.0	9.00
Rackheath Water Recycling Centre	1.80	1.80	0.23	25.0	9.00
Reepham Water Recycling Centre	0.83	0.83	0.23	25.0	9.00
Ridlington(Norfolk) STW	6.00	6.00	0.23	25.0	9.00
Roughton Water Recycling Centre	1.34	1.34	0.23	25.0	9.00
Saxlingham STW	6.00	6.00	0.23	25.0	9.00
Spooner Row School Lane STW	6.00	6.00	0.23	25.0	9.00
Sculthorpe STW	0.65	0.65	0.23	25.0	9.00
Shipdham STW	6.00	6.00	0.23	25.0	9.00
Shotesham The Grove STW	6.00	6.00	0.23	25.0	9.00
Skeyton STW	6.00	6.00	0.23	25.0	9.00

Water Recycling centres	Current TP discharge concentration (mg/l)	Post-2025 TP discharge concentration (mg/l)	Post-2030 TP discharge concentration (mg/l)	Current TN discharge concentration (mg/l)	Post-2030 TN permit limit (mg/l)
Sloley STW	6.00	6.00	0.23	25.0	9.00
Smallburgh STW	6.00	6.00	0.23	25.0	9.00
South Raynham	6.00	6.00	0.23	25.0	9.00
Southrepps STW	2.28	0.45	0.23	25.0	9.00
Sparham Norwich Road WRC	6.00	6.00	0.23	25.0	9.00
Sparham(Wells Close)	6.00	6.00	0.23	25.0	9.00
Stalham Water Recycling Centre	0.86	0.86	0.23	25.0	9.00
Stanfield STW	6.00	6.00	0.23	25.0	9.00
Stibbard Moor End STW	6.00	6.00	0.23	25.0	9.00
Stoke Holy Cross STW	6.00	6.00	0.23	25.0	9.00
Swanton Abbott STW	6.00	6.00	0.23	25.0	9.00
Swanton Morley Water Recycling Centre	1.52	1.52	0.23	25.0	9.00
Swanton Novers STW	6.00	6.00	0.23	25.0	9.00
Swardeston STW	6.00	0.36	0.23	25.0	9.00
Tibenham The Street STW	6.00	6.00	0.23	25.0	9.00
Weasenham All Saints STW	6.00	6.00	0.23	25.0	9.00
Weasenham St.Peter STW	6.00	6.00	0.23	25.0	9.00
Wendling STW	6.00	6.00	0.23	25.0	9.00
West Raynham STW	6.00	6.00	0.23	25.0	9.00
Whinburgh	6.00	6.00	0.23	25.0	9.00
Whitlingham Water Recycling Centre	6.00	6.00	0.23	25.0	9.00

Water Recycling centres	Current TP discharge concentration (mg/l)	Post-2025 TP discharge concentration (mg/l)	Post-2030 TP discharge concentration (mg/l)	Current TN discharge concentration (mg/l)	Post-2030 TN permit limit (mg/l)
Wymondham Water Recycling Centre	0.90	0.90	0.23	25.0	9.00

A2 Appendix A2: Agricultural runoff coefficients

Wensum – P runoff coefficients

	500-600 mm/yr						600-700 mm/yr						700-900 mm/yr					
Land Use	**Free draining**		**Impermeable (Drained for Arable)**		**Impermeable (Drained for Arable + Grassland)**		**Free draining**		**Impermeable (Drained for Arable)**		**Impermeable (Drained for Arable + Grassland)**		**Free draining**		**Impermeable (Drained for Arable)**		**Impermeable (Drained for Arable + Grassland)**	
Dairy	0.14	0.14	0.19	0.19	0.50	0.51	0.14	0.14	0.19	0.19	0.50	0.51	1.31	0.98	0.41	0.41	0.83	0.84
Lowland grazing	0.06	0.06	0.11	0.11	0.43	0.50	0.06	0.06	0.11	0.11	0.43	0.50	0.11	0.16	0.22	0.22	0.68	0.68
Mixed Livestock	0.06	0.06	0.28	0.29	0.55	0.60	0.06	0.06	0.28	0.29	0.55	0.60	0.14	0.18	0.60	0.60	0.94	0.95
Poultry	0.17	0.12	0.35	0.38	0.71	0.68	0.17	0.12	0.35	0.38	0.71	0.68	0.26	0.37	0.70	0.74	1.08	1.14
Pig	0.07	0.07	0.35	0.38	0.58	0.68	0.07	0.07	0.35	0.38	0.58	0.68	0.17	0.23	0.72	0.76	1.00	1.05
Horticulture	0.05	0.05	0.33	0.33	0.52	0.53	0.05	0.05	0.33	0.33	0.52	0.53	0.14	0.15	0.66	0.70	0.92	0.97
Cereals	0.05	0.05	0.34	0.34	0.56	0.56	0.05	0.05	0.34	0.34	0.56	0.56	0.15	0.15	0.73	0.73	0.98	0.98
General Arable	0.05	0.05	0.31	0.31	0.53	0.50	0.05	0.05	0.31	0.31	0.53	0.50	0.13	0.13	0.64	0.64	0.90	0.90
Allotment	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.13	0.13	0.13	0.13	0.13	0.13

Yare – P runoff coefficients

	500-600 mm/yr						600-700 mm/yr						700-900 mm/yr					
Land Use	**Free draining**		**Impermeable (Drained for Arable)**		**Impermeable (Drained for Arable + Grassland)**		**Free draining**		**Impermeable (Drained for Arable)**		**Impermeable (Drained for Arable + Grassland)**		**Free draining**		**Impermeable (Drained for Arable)**		**Impermeable (Drained for Arable + Grassland)**	
Dairy	0.14	0.14	0.27	0.28	0.83	0.85	0.14	0.14	0.27	0.28	0.83	0.85	1.31	0.98	1.31	0.98	1.31	1.31
Lowland grazing	0.09	0.09	0.15	0.15	0.51	0.51	0.09	0.09	0.15	0.15	0.51	0.51	0.16	0.16	0.26	0.25	0.80	0.78
Mixed Livestock	0.07	0.08	0.29	0.30	0.59	0.59	0.07	0.08	0.29	0.30	0.59	0.59	0.18	0.18	0.61	0.62	1.00	1.01
Poultry	0.16	0.18	0.39	0.43	0.60	0.65	0.16	0.18	0.39	0.43	0.60	0.65	0.37	0.37	0.80	0.85	1.06	1.26
Pig	0.08	0.10	0.35	0.38	0.58	0.62	0.08	0.10	0.35	0.38	0.58	0.62	0.23	0.23	0.77	0.82	1.00	1.12
Horticulture	0.05	0.05	0.31	0.31	0.52	0.52	0.05	0.05	0.31	0.31	0.52	0.52	0.15	0.15	0.64	0.66	0.92	0.92
Cereals	0.06	0.06	0.34	0.34	0.56	0.56	0.06	0.06	0.34	0.34	0.56	0.56	0.17	0.18	0.73	0.74	0.98	0.99
General Arable	0.05	0.05	0.29	0.29	0.49	0.49	0.05	0.05	0.29	0.29	0.49	0.49	0.15	0.15	0.61	0.62	0.85	0.86
Allotment	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.62	0.62	0.62	0.62	0.62	0.62

Bure – P runoff coefficients

Bure	500-600 mm/yr						600-700 mm/yr						700-900 mm/yr					
Land Use	Free draining		Impermeable (Drained for Arable)		Impermeable (Drained for Arable + Grassland)		Free draining		Impermeable (Drained for Arable)		Impermeable (Drained for Arable + Grassland)		Free draining		Impermeable (Drained for Arable)		Impermeable (Drained for Arable + Grassland)	
Dairy	0.14	0.14	0.28	0.28	0.88	0.90	0.14	0.14	0.28	0.28	0.88	0.90	1.31	0.98	1.31	0.98	1.31	1.31
Lowland grazing	0.10	0.10	0.16	0.16	0.50	0.50	0.10	0.10	0.16	0.16	0.50	0.50	0.17	0.16	0.28	0.25	0.85	0.78
Mixed Livestock	0.09	0.09	0.33	0.33	0.60	0.60	0.09	0.09	0.33	0.33	0.60	0.60	0.20	0.18	0.67	0.62	1.00	1.01
Poultry	0.16	0.16	0.41	0.44	0.71	0.75	0.16	0.16	0.41	0.44	0.71	0.75	0.34	0.37	0.80	0.85	1.20	1.26
Pig	0.08	0.08	0.38	0.42	0.62	0.68	0.08	0.08	0.38	0.42	0.62	0.68	0.21	0.23	0.77	0.82	1.06	1.12
Horticulture	0.05	0.05	0.33	0.33	0.53	0.53	0.05	0.05	0.33	0.33	0.53	0.53	0.16	0.15	0.66	0.66	0.96	0.92
Cereals	0.06	0.06	0.36	0.36	0.56	0.56	0.06	0.06	0.36	0.36	0.56	0.56	0.18	0.18	0.77	0.74	1.04	0.99
General Arable	0.05	0.05	0.32	0.32	0.50	0.50	0.05	0.05	0.32	0.32	0.50	0.50	0.15	0.15	0.65	0.62	0.91	0.86
Allotment	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.62	0.62	0.62	0.62	0.62	0.62

Wensum – N runoff coefficients

	500-600 mm/yr						600-700 mm/yr						700-900 mm/yr					
Land Use	**Free draining**		**Impermeable (Drained for Arable)**		**Impermeable (Drained for Arable + Grassland)**		**Free draining**		**Impermeable (Drained for Arable)**		**Impermeable (Drained for Arable + Grassland)**		**Free draining**		**Impermeable (Drained for Arable)**		**Impermeable (Drained for Arable + Grassland)**	
Dairy	35.87	35.87	12.05	12.15	11.17	11.30	35.87	35.87	12.05	12.15	11.17	11.30	22.54	18.10	17.17	17.32	12.96	13.11
Lowland grazing	12.94	13.02	8.87	8.93	7.97	9.68	12.94	13.02	8.87	8.93	7.97	9.68	17.55	22.39	13.66	13.75	9.62	9.65
Mixed Livestock	27.33	27.39	18.76	18.96	18.83	21.55	27.33	27.39	18.76	18.96	18.83	21.55	33.11	38.38	24.06	24.32	20.64	20.98
Poultry	244.30	231.58	144.04	149.96	138.11	140.47	244.30	231.58	144.04	149.96	138.11	140.47	273.57	287.23	177.92	185.52	141.39	152.82
Pig	93.57	93.25	59.54	61.69	56.34	79.38	93.57	93.25	59.54	61.69	56.34	79.38	109.91	147.90	73.20	75.97	60.56	64.79
Horticulture	22.09	22.39	15.49	15.52	15.97	16.00	22.09	22.39	15.49	15.52	15.97	16.00	26.42	26.19	19.08	19.09	17.12	17.02
Cereals	26.47	26.54	19.11	19.16	20.20	20.25	26.47	26.54	19.11	19.16	20.20	20.25	31.52	31.61	23.75	23.82	21.97	22.03
General Arable	25.28	25.35	17.62	17.67	18.23	19.17	25.28	25.35	17.62	17.67	18.23	19.17	29.97	30.05	21.72	21.77	19.48	19.52
Allotment	25.35	25.35	25.35	25.35	25.35	25.35	25.35	25.35	25.35	25.35	25.35	25.35	30.05	30.05	30.05	30.05	30.05	30.05

Yare – N runoff coefficients

Yare	500-600 mm/yr						600-700 mm/yr						700-900 mm/yr					
Land Use	Free draining		Impermeable (Drained for Arable)		Impermeable (Drained for Arable + Grassland)		Free draining		Impermeable (Drained for Arable)		Impermeable (Drained for Arable + Grassland)		Free draining		Impermeable (Drained for Arable)		Impermeable (Drained for Arable + Grassland)	
Dairy	35.87	35.87	22.72	24.35	18.31	18.64	35.87	35.87	22.72	24.35	18.31	18.64	22.54	18.10	22.54	18.10	22.54	22.54
Lowland grazing	16.52	16.42	11.24	11.32	9.85	9.87	16.52	16.42	11.24	11.32	9.85	9.87	22.39	22.39	17.62	17.59	11.91	11.76
Mixed Livestock	30.56	31.47	20.94	21.21	20.84	21.19	30.56	31.47	20.94	21.21	20.84	21.19	38.38	38.38	27.25	28.27	23.37	23.83
Poultry	257.38	243.03	158.74	165.42	146.43	156.49	257.38	243.03	158.74	165.42	146.43	156.49	287.23	287.23	187.03	195.03	157.06	160.54
Pig	101.74	125.44	64.59	67.00	60.94	64.61	101.74	125.44	64.59	67.00	60.94	64.61	147.90	147.90	97.81	101.80	65.71	86.47
Horticulture	21.86	22.15	15.39	15.50	15.96	15.99	21.86	22.15	15.39	15.50	15.96	15.99	26.19	26.19	19.05	19.13	17.12	17.15
Cereals	26.13	26.21	19.23	19.29	20.56	20.62	26.13	26.21	19.23	19.29	20.56	20.62	31.21	31.51	23.99	24.03	22.55	22.42
General Arable	24.70	24.77	17.41	17.46	18.16	18.20	24.70	24.77	17.41	17.46	18.16	18.20	31.17	31.25	21.56	22.76	19.53	20.53
Allotment	24.77	24.77	24.77	24.77	24.77	24.77	24.77	24.77	24.77	24.77	24.77	24.77	26.19	26.19	26.19	26.19	26.19	26.19

Bure – N runoff coefficients

Bure	500-600 mm/yr						600-700 mm/yr						700-900 mm/yr					
Land Use	Free draining		Impermeable (Drained for Arable)		Impermeable (Drained for Arable + Grassland)		Free draining		Impermeable (Drained for Arable)		Impermeable (Drained for Arable + Grassland)		Free draining		Impermeable (Drained for Arable)		Impermeable (Drained for Arable + Grassland)	
Dairy	35.87	35.80	24.09	24.35	19.06	19.43	35.87	35.80	24.09	24.35	19.06	19.43	22.54	18.10	22.54	18.10	22.54	22.54
Lowland grazing	18.15	18.29	12.39	12.48	9.65	9.68	18.15	18.29	12.39	12.48	9.65	9.68	25.00	22.39	19.50	17.59	13.14	11.76
Mixed Livestock	34.60	34.74	23.56	23.85	21.18	21.55	34.60	34.74	23.56	23.85	21.18	21.55	42.91	38.38	31.32	28.27	23.37	23.83
Poultry	228.65	227.66	141.90	147.63	138.11	147.41	228.65	227.66	141.90	147.63	138.11	147.41	268.72	287.23	175.37	195.03	148.53	160.54
Pig	89.80	89.51	57.34	82.66	74.68	79.38	89.80	89.51	57.34	82.66	74.68	79.38	105.49	147.90	97.81	101.80	80.36	86.47
Horticulture	22.63	22.69	15.78	15.82	15.97	16.00	22.63	22.69	15.78	15.82	15.97	16.00	26.79	26.19	19.08	19.13	17.34	17.15
Cereals	25.75	25.83	18.70	18.75	20.45	20.51	25.75	25.83	18.70	18.75	20.45	20.51	30.70	31.51	23.29	24.03	21.57	22.42
General Arable	27.73	2.80	19.36	19.40	19.12	19.17	27.73	2.80	19.36	19.40	19.12	19.17	32.90	31.25	23.83	22.76	21.38	20.53
Allotment	27.8	27.8	27.8	27.8	27.8	27.8	27.8	27.8	27.8	27.8	27.8	27.8	26.19	26.19	26.19	26.19	26.19	26.19

7 Oct 2022

Our ref: Norfolk Nutrient calculator response

Dragonfly House
2 Gilders Way
Norwich NR3 1UB

FAO: Heads Planning, Development Management and Planning Policy

By email only

Dear Sir/Madam

Consultation: Norfolk Nutrient Budget Calculator (Developed by Norfolk LPAs and Royal Haskoning)

Thank you for your email of 23 September from Trevor Wiggett, consulting Natural England on the nutrient budget calculator that the Norfolk Authorities have developed with support from Royal Haskoning, hereafter referred to as the 'Norfolk calculator'.

Natural England notes that the approach adopted in the Norfolk calculator is broadly consistent with that which underpins the Natural England nutrient budget calculator. This response therefore focusses on the elements of the Norfolk calculator for which a different approach, or different figures have been used.

Following a review of the information shared with Natural England, there are three elements of the Norfolk calculator where the approach differs from that in the Natural England calculator:

1. Occupancy rates
2. Water usage
3. WwTW discharge concentrations

Detailed comments and advice regarding the three aforementioned elements are set out below.

Occupancy rates:

As set out in the Natural England Nutrient Neutral Generic Methodology and the Natural England Calculator Guidance document; "Competent authorities must satisfy themselves that the residents per dwelling/unit value used in this step of the calculation reflects local conditions in their area. The residents per dwelling value can be derived from national data providing it reflects local conditions. However, if national data does not yield a residents per dwelling/unit value that reflects local occupancy levels then locally relevant data should be used instead. Whichever figure is used, it is important to ensure it is sufficiently robust and appropriate for the project being assessed."

The Norfolk calculator also includes a separate occupancy rate for houses with multiple occupancy (HMO) and for hotels/guest houses to be used when there is development with an additional number of rooms above six residents. For hotels/guesthouse developments, the calculator additionally allows for a bespoke

figure of number of weeks occupied per year and an average occupancy rate (0-100%). There is no information in the ORS report to explain how these figures have been derived, or to support using a different occupancy rate for HMOs/tourist accommodation. The Royal Haskoning report indicates that the average occupancy rate for hotels and HMOs comes from the Dorset Heaths SPD. This SPD specifies a 1.65 occupancy rate for 'flats' but with no detailed information as to how this has been derived.

Natural England would advise that suitable provisions should be put in place to ensure that should hotels/guesthouses revert to residential accommodation in the future, there is a mechanism to assess the potential for any resulting change in nutrient load. We would further advise that the number of weeks per year use, and average occupancy of hotels and tourism accommodation should be adequately evidenced to provide the necessary certainty required for Appropriate Assessment.

Natural England therefore support the use of locally relevant data to derive an appropriate occupancy figure for Norfolk. The Norfolk Authorities, as competent authority must be satisfied that the evidence underpinning the occupancy rate in the Norfolk calculator is sufficiently robust and appropriate. We would recommend that project level Appropriate Assessments which are informed by the Norfolk calculator specifically include justification for why the competent authority has decided upon the occupancy rate that has been used.

We would also recommend the Norfolk Authorities review the comments made by Justice Jay at the High Court in the Wyatt v Fareham Judicial Review, regarding the use of occupancy rates which are appropriate to the type of development being permitted.

Water Usage:

The Natural England methodology and calculator recommends the addition of 10 litres per person, per day to the Building Regulations standard being applied to the planning permission (e.g. 110 litres per person, per day). The Norfolk calculator has removed this additional 10 litres per person, per day and relies on the Building Regulations standard which is secured as part of the planning permission.

The Norfolk Authorities have referenced a study to support the removal of the additional 10 litres per person, per day. It is noted that this study is of homes built to the 125 litres per person, per day standard, rather than 110 litres. We would highlight that Natural England's methodology was informed by the analysis by Waterwise of homes in London built to a stricter 105 l/person/day under the Code for Sustainable Homes which showed that actual water usage ranged between 110 to 140.75 litres per person, per day, depending on the occupancy rates (https://www.waterwise.org.uk/knowledge-base/advice-on-water-efficient-new-homes-for-england-september-2018/).

Natural England advise that the removal of the additional 10 litres per person, per day makes the Norfolk calculator less precautionary than the approach set out in the Natural England methodology, and the Natural England calculator.

WwTW discharge concentrations:

The Norfolk calculator uses a hybrid approach of retaining the Natural England methodology for Waste-water Treatment Works (WwTW) with high levels of anticipated new connections, and current discharge concentrations with an additional precautionary uplift for WwTW with lower levels of anticipated new connections.

Water companies can increase the concentration of nutrients in the waste-water discharged from WwTW up to the level set in their Environment Agency permit without the requirement for any new consent or consultation. Therefore, the Norfolk Authorities must be satisfied that the figures used in the Norfolk calculator do not risk underestimating the nutrient load of new development connecting to WwTW with lower levels of anticipated growth. It is important to recognise that when undertaking an Appropriate Assessment, potential impacts need to be considered over the lifetime of the development proposal.

For WwTW which do not benefit from a discharge permit with a defined maximum nutrient concentration, the Norfolk calculator uses 6mg/litre for Total Phosphorus, and 25mg/litre for Total Nitrogen. We note that these are the national average values used by the Environment Agency for their planning purposes.

However, as these values represent the national average, there will be a variation in WwTW performance with some performing better, and others worse than this figure.

Natural England advise that the reduction (by 2mg/litre) in the values used in the Norfolk calculator for WwTW without a defined maximum nutrient concentration makes the Norfolk calculator less precautionary than the approach set out in the Natural England methodology, and the Natural England calculator.

The Norfolk calculator includes future discharge concentration values for WwTW which have upgrades planned as part of the Periodic Review (PR) process. This is consistent with the approach set out in the Natural England methodology, and the approach taken for the Natural England calculator. The Norfolk calculator also incorporates the Technically Achievable Limit (TAL) figure from 2030 (0.25mg/litre for Phosphorus and 10mg/litre for Nitrogen) which was announced as a requirement for water companies in nutrient neutrality areas by Defra Secretary of State in July 2022.

The announced requirement for water companies to achieve TAL will be legislated through the Levelling-up and Regeneration Bill. Natural England advise that until the Bill receives Royal Assent the requirement for TAL cannot be considered certain. We recommend that the pre-2030 figure is used to determine the mitigation requirement for new development until the legislation securing the requirement for water companies to achieve TAL is in place.

Summary of Natural England's Advice

As set out above, Natural England considers the Norfolk calculator to have reduced the level of precaution in the nutrient budget calculation in comparison to the methodology and calculator we have produced. A reduction in the level of precaution in the nutrient budget calculation will have a corresponding increase in the potential for the mitigation delivered to be insufficient to fully address the potential for adverse effect to the Broads SAC, and River Wensum SAC.

Natural England accepts that it is the decision of the Norfolk Authorities, as Competent Authority to determine the approach (and associated calculations) taken to Appropriate Assessment of new development proposals. We therefore recommend that the Authorities take legal advice to ensure the approach taken to inform Appropriate Assessment of new development proposals is robust and not open to legal challenge.

Natural England do not intend to raise objection to the Norfolk Authorities using the Norfolk calculator to inform their Appropriate Assessments, other than the specific inclusion of the TAL figure for WwTW from 2030 onwards. As highlighted, the 2030 upgrades are not yet in legislation and therefore cannot be considered sufficiently certain to form the basis of a nutrient budget for new development proposals. Therefore, any Appropriate Assessment which relies on these figures, in advance of the relevant legislation being in place, would lead to an objection by Natural England.

Consultation responses to Appropriate Assessments relating to nutrient neutrality, which do not rely on the TAL figure from 2030 will include the following advice from Natural England:

Natural England notes that the Authority's own calculator has been used to calculate the nutrient budget for this application. This calculator deviates from the Natural England nutrient neutral methodology. As set out in our letter dated 7 Oct 2022 your Authority must be satisfied that the calculator is based on robust evidence and takes a suitably precautionary approach.

I hope this information is helpful, please contact my colleague Helen Dixon in the first instance if you wish to discuss further helen.dixon@naturalengland.org.uk

Yours faithfully

Simon Thompson
Principle Adviser – Strategic Solutions
Strategy and Government Advice

Appendix G

Outcomes from a Systematic Review of Existing and Proposed Allocations to Accommodate Gypsy and Traveller Pitches

1. In attempting to find pitches for Gypsies and Travellers to include in the local plan the GNLP Team undertook a systematic review of all existing and proposed new site allocations.

2. This review began by narrowing down which sites genuinely offered some potential; so it ruled out sites likely being deleted from the plan, allocations where the use proposed (such as open space) is inconsistent with a Gypsy site, ruling out small sites of less than 50 homes where it would be financially unrealistic to provide a Gypsy site, and ruling out sites with a consent or planning application pending. The process undertaken, which involved officers from each of the three development management teams, left 8 sites with potential for further consideration.

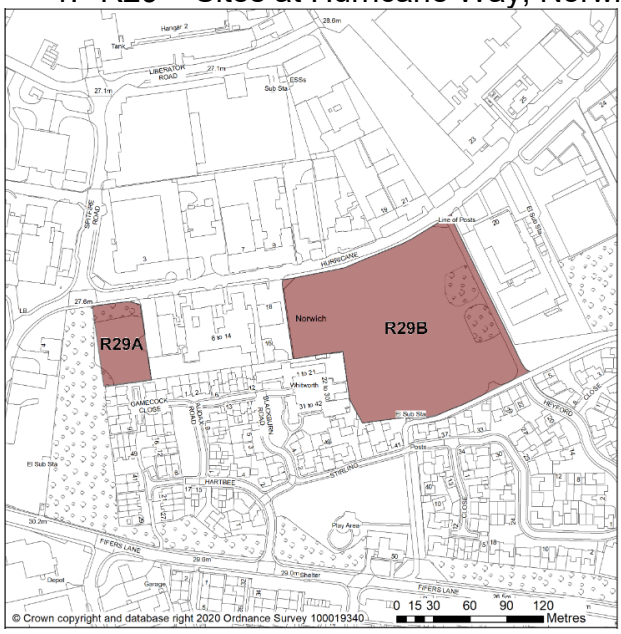
    1. R29 – Sites at Hurricane Way, Norwich
    2. GNLP0132 – White House Farm, Sprowston
    3. HAR7 – Land south of Spirketts Lane, Harleston
    4. GNLP0354R – Land at Johnsons Farm, Wymondham
    5. GNLP3013 – Land north of Tuttles Lane, Wymondham
    6. GNLP0378R/2139R – Land west of Acle
    7. GNLP0125R – Land to west of West Lane, Horsham St Faith
    8. SWA1/GNLP0382 – Land to rear of Burlingham Road, South Walsham

3. For each of the 8 sites officers approached the relevant promoter/landowner during late October and early November, attempting to make contact both by telephone and email, but none have responded positively. Promoters or agents have either politely said they are not interested in this form of development on their site, or they have not replied to voicemails and emails.

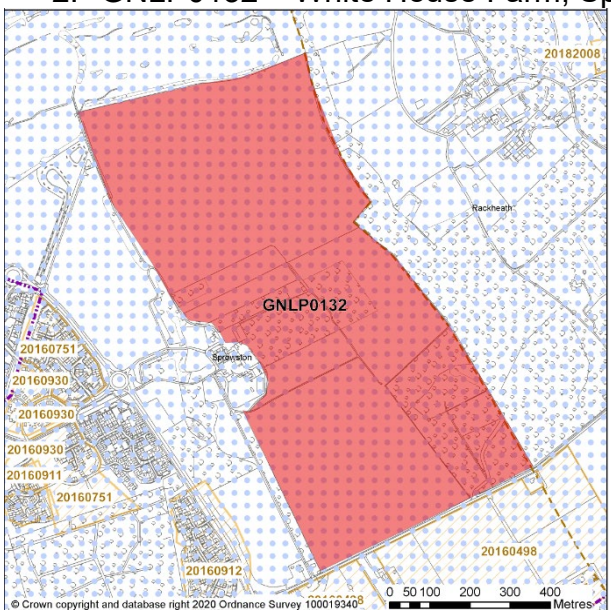
4. As a result, it is concluded that there is no potential for existing and proposed allocation sites in the Greater Norwich Local Plan to provide Gypsy and Traveller accommodation pitches.

List of Sites

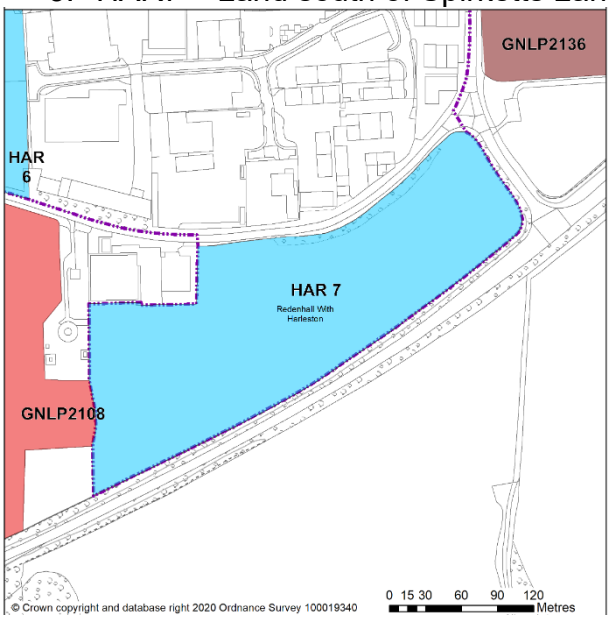
1. R29 – Sites at Hurricane Way, Norwich



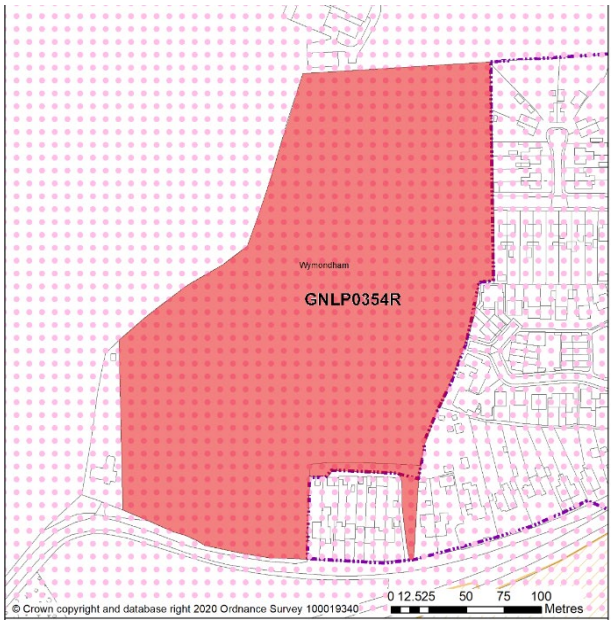
2. GNLP0132 – White House Farm, Sprowston



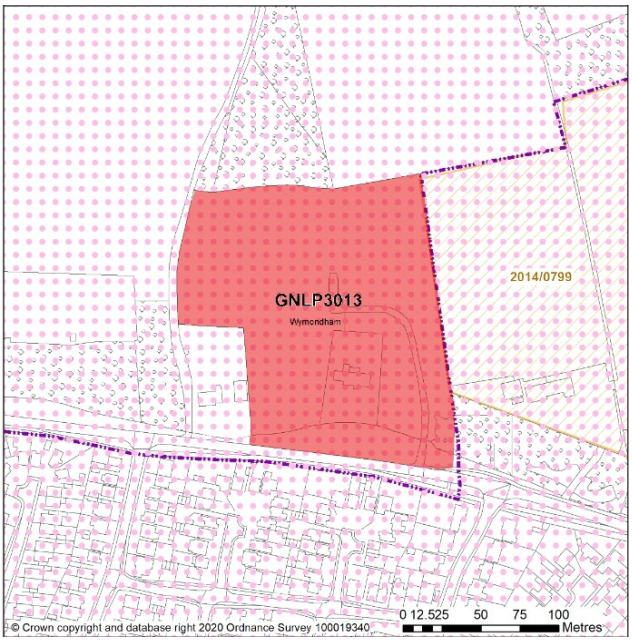
3. HAR7 – Land south of Spirketts Lane, Harleston



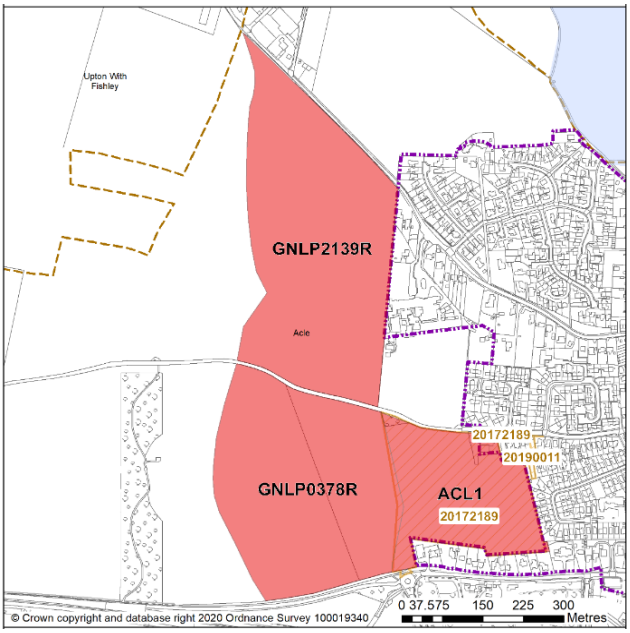
4. GNLP0354R – Land at Johnsons Farm, Wymondham



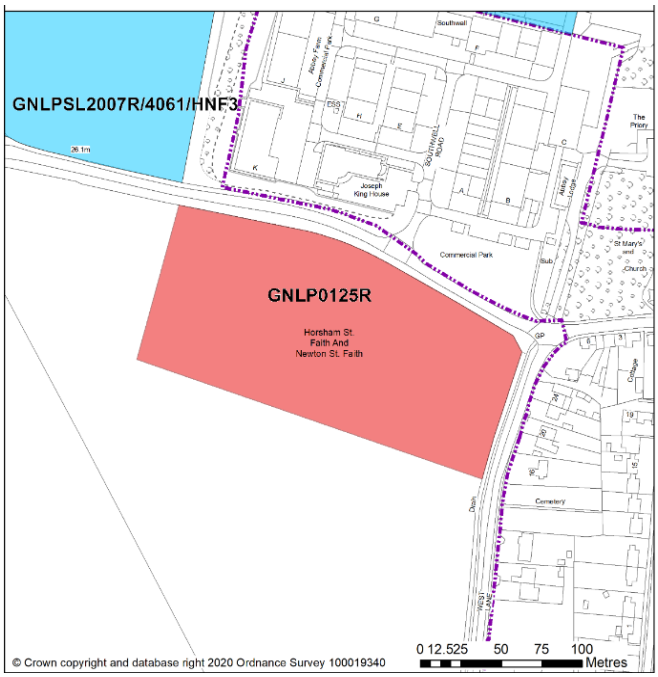
5. GNLP3013 – Land north of Tuttles Lane, Wymondham



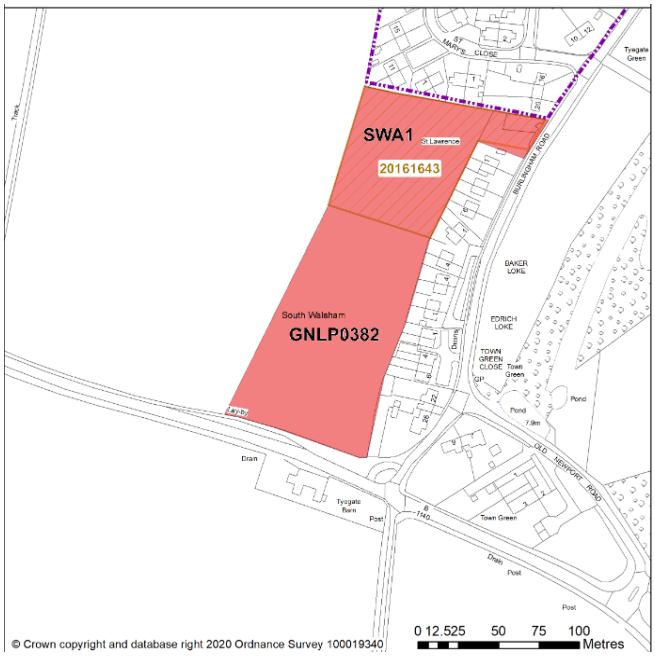
6. GNLP0378R/2139R – Land west of Acle



7. GNLP0125R - Land to west of West Lane, Horsham St Faith



8. SWA1/GNLP0382 – Land to rear of Burlingham Road, South Walsham



Agenda Item: 6
Cabinet
9 January 2023

Regulation 19 Pre-Submission Publication of the South Norfolk Village Cluster Housing Allocation Plan

Report Author(s): Paul Harris
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01603 430444
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Portfolio: External Affairs and Policy and Stronger Economy

Ward(s) Affected: All

Purpose of the Report:
The South Norfolk Village Cluster Housing Allocation Plan (VCHAP) seeks to allocate a minimum of 1,200 homes across the South Norfolk Village Clusters. This report seeks agreement for the Regulation 19 pre-submission publication of the VCHAP.

Recommendations:
Cabinet to agree to:

1. Publish the pre-submission version of the South Norfolk Village Cluster Housing Allocation Plan (VCHAP) under Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012, as amended;

   and,

2. Delegate authority to the Assistant Director for Planning in consultation with the Portfolio Holders for External Affairs and Policy and Stronger Economy to:

   a. make minor or factual corrections to the VCHAP prior to its publication, and;

   b. finalise evidence base and other support documents in connection with the publication of the VCHAP.

1. Summary

1.1 The South Norfolk Village Clusters Housing Allocations Plan (VCHAP) seeks to fulfil the GNLP requirement to allocated 1,200 additional new homes across the South Norfolk Village Clusters.

1.2 Following an extensive process of evidence gathering, site assessment, consultation and engagement a final draft of the VCHAP has been prepared for publication. The final draft of the VCHAP is considered to be an appropriate strategy, taking into account reasonable alternatives, with a realistic prospect that the identified site allocations will be developed by the end of the plan period in 2038. Together with the emerging allocations of the Diss and District and Dickleburgh Neighbourhood Plans, the allocations identified in the plan will meet the minimum housing requirement set out in the emerging GNLP.

1.3 The publication of the Plan provides an opportunity for the public and other stakeholders to make representations on whether the Plan is legally compliant and "Sound" in accordance with the terms of the National Planning Policy Framework. These representations would then subsequently be considered through the independent examination of the Plan.

1.4 The final decision to submit the Plan for independent examination will be subject to a further resolution of Full Council. This decision will be made after the publication period has ended and will take into account any representations received.

2. Background

2.1 South Norfolk Council is a partner in the production of the Greater Norwich Local Plan (GNLP). The GNLP sets out policies to guide development across Broadland, Norwich and South Norfolk up to 2038. The GNLP is currently being examined by independent inspectors appointed by the Secretary of State.

2.2 The GNLP sets out strategic policies for the whole of the Greater Norwich area alongside allocating specific areas of land for particular types of development. This includes identifying development sites for most of the new homes required across the area. However, the GNLP is not allocating the sites in the South Norfolk Village Clusters. Instead, it sets out a requirement for sites to accommodate at least 1,200 new homes in those settlements. The South Norfolk Village Clusters Housing Allocations Plan (VCHAP) seeks to fulfil this requirement.

2.3 Following consideration by the Regulation and Planning Policy Committee and Cabinet, a draft VCHAP was published for public consultation. The consultation took place between 7 June 2021 and 2 August 2021.

2.4 Since that consultation the Place Shaping Team have been analysing consultation responses, under-taking further appraisal of development sites and developing technical evidence in order to prepare the final pre-submission publication version of the VCHAP.

3. Current position/findings

3.1 The Regulation 19 pre-submission publication version of the VCHAP has been prepared. The publication version is the final draft of the plan that is intended to be submitted to the Secretary of State for independent examination. The publication version of the VCHAP is included as Appendix A to this report. The associated Policies Maps showing proposed allocations and settlement limits is available as part of the background materials.

3.2 The publication of the Plan provides an opportunity for the public and other stakeholders to make representations on whether the Plan is legally compliant and "Sound". The tests of soundness are set out in the National Planning Policy Framework and are as follows:

a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and,

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

3.3 The final decision to submit the Plan for independent examination will be subject to a further resolution of the Council. This decision will be made after the publication period has ended and will take into account any representations received.

Content of the Plan

3.4 The Plan includes introductory and explanatory sections alongside 3 core objectives. The objectives set out what the plan is seeking to achieve. The plan also includes a monitoring framework to evaluate the Plan's success. Alongside these sections are individual chapters on each of the 48 Village Clusters that have been defined within South Norfolk. The Cluster chapters are the main element of the Plan.

3.5 Each chapter contains an overview of the form and character of the settlements within the cluster and of the services and facilities that are available. In addition to this general information are details of the proposed Settlement Limits in each

settlement and planning policies for the new and carried forward residential site allocations.

3.6 Overall, the document includes 45 new residential allocations and 11 residential allocations that have been carried forward from the South Norfolk Site Allocations and Policies Document. In addition, changes are proposed to the Settlement Limit in 21 individual settlements.

3.7 In addition to those proposed in the VCHAP, residential allocations within the Scole; Roydon; Burston, Shimpling and Gissing; and, Dickleburgh clusters are being taken forward through the Diss and District Nighbourhood Plan and Dickleburgh Neighbourhood Plan.

3.8 In combination the allocations of the VCHAP and those in emerging Neighbourhood Plans are currently expected to total approximately 1,228 homes. Key figures relating to the Plan are set out below:

Table 1 Village Cluster Housing Allocation Plan - Key Figures

Item	Value
Number of new residential allocations proposed in the Village Cluster Plan.	45
Number of carried-forward allocations in the Village Cluster Plan.	11
Numbers of Settlement Limits proposed to be changed in the Village Cluster Plan.	21
Number of new and carry-forward allocations expected to be made through Neighbourhood Plans.	5
Total number of net additional homes expected to be delivered through new and carry-forward allocations.	1,228
Average size of new allocations in the Village Cluster Plan.	24.49
Median size of new allocations in the Village Cluster Plan.	25
Number of new allocations in the Village Cluster Plan of 25 or less homes.	31
Number of new allocations in the Village Cluster Plan of more than 25 homes.	14

Key Changes from the Regulation 18 Consultation

3.9 A number of changes have been made to the pre-submission version of the VCHAP when compared to the version that was consulted on in 2021. These changes result from analysis of the representations received, assessment of new

and revised sites, further technical analysis and engagement with site promoters and landowners. The key changes to the document are listed below:

- Minor modifications and changes to the Plan Objectives taking account of representations.

- Removal of the previously proposed Core Policies on the basis that, on balance, it was not considered that they would add substantively to the existing and emerging local and national planning policies.

- Removal of proposed allocation sites in Bressingham, Hapton, Hempnall, Kirby Cane, Pulham Market, Seething and Wreningham. The removal of these allocations from the plan reflects variously the outcome of updated site assessments, the lack of active support from a landowner or withdrawal of the site. It should be noted that in some instances more than one allocation site was proposed in a settlement/cluster. Therefore, the removal of an individual allocation within the pre-submission plan does not necessarily mean that no allocations are now proposed within a particular cluster. Appendix A of the Village Cluster Plan includes a list of all proposed allocations.

- Replacement allocations are proposed in Little Melton, Earsham, Winfarthing and Woodton. These replace or amend allocations previously proposed on the basis that new or revised sites are considered to perform better than the previously promoted options. The replacement allocations in Little Melton and Woodton also result in an uplift of 10 homes in the relevant cluster compared to what was proposed in the previous consultation.

- New, additional or enlarged allocations are also proposed in Barford, Ellingham, Gt Moulton, Haddiscoe, Thurlton and Wortwell.

- In addition to the above, a significant Settlement Limit extension is proposed at Bawburgh incorporating the recent development at Saint Walstan Meadow and established development to the east.

Evidence Base and Key Findings

3.10 A number of fact-finding or research studies and planning assessments have been prepared to support the preparation of the VCHAP. These include:

- Sustainability Appraisal (incorporating Strategic Environmental Assessment);
- Habitat Regulations Assessment;
- Water Cycle Study;
- Strategic Flood Risk Assessment;
- Viability Appraisal;
- Report of Consultation;
- Individual Site Assessments;
- Heritage Impact Assessments; and,
- Landscape and Visual Appraisals.

3.11 These studies and assessments have been prepared iteratively alongside the preparation of the Plan. Interim or initial versions of the Sustainability Appraisal, Habitat Regulations Assessment, Report of Consultation and Site Assessments were published alongside the consultation that took place in 2021. Core evidence base documents are provided as background documents to this report.

3.12 Key findings that arise from these studies and assessments are as follows:

Sustainability Appraisal

3.13 A sustainability appraisal (SA) must be prepared alongside local plans. Its purpose is to assess the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. In doing so it assists plan makers to understand the impacts of their plan and ways in which negative impacts can be minimised or mitigated and positive impacts maximised.

3.14 For the purposes of the VCHAP the assessment of reasonable alternatives essentially takes two forms. Firstly, the assessment of individual sites, giving consideration to whether particular sites perform better, in SA terms, than others at the settlement level. The second element is to assess the overall approach to the distribution of sites across the different village clusters.

Assessment of Individual Sites

3.15 The interim SA prepared to support the 2021 consultation version of the VCHAP did not identify any individual site that performed significantly better than those which emerged as preferred sites within the Council's site assessment process. A comparative assessment was undertaken to support the preparation of the pre-submission version of the plan, which considered clusters where new or revised sites had been promoted through the 2021 consultation. Its conclusions broadly mirrored those of the earlier assessment. Specifically, that, at the settlement scale, no site performed meaningfully better than those emerging through the Council's site assessment process. At the time of writing the draft SA issued to inform member deliberations has not further considered the SA merits of individual sites. Given that work that has been undertake however, it is not expected that such assessment would differ substantively from those in earlier assessments.

Overall Approach to the Distribution of Development

3.16 The interim SA prepared to support the Regulation 18 consultation version of the VCHAP assessed three high level alternatives: An accessibility led option focusing on those clusters with the greatest access to services; a dispersal led option that sought to distribute development to all clusters; and, an option which sought to achieve a balance between the two. This final, balanced, option was that which most closely reflected the approach proposed within the 2021 consultation document. At this point the interim SA found that a dispersed approach clearly performed worst in SA terms. The balanced and accessibility-led options were however much more finely balanced. The accessibility-led option performing better

in terms of the heavily interrelated issues of transport, climate change and accessibility. The balanced option performed better in terms of housing and landscape.

3.17 Overall, the interim SA tended toward the accessibility-led option but acknowledged that such an option would lead to missed opportunities in respect of supporting community infrastructure.

3.18 The approach taken in the proposed submission version of the VCHAP continues to broadly reflect an approach that seeks to strike a balance between distributing housing across suitable villages. This reflects a higher emphasis given in the plan making process to housing issues and to maintaining and enhancing the vitality of rural settlements, including by supporting community/social infrastructure in villages across large parts of the South Norfolk geography.

3.19 Part 1 of the draft SA of the pre-submission plan has evolved the initial appraisal of alternatives, excluding the dispersal option but considering in more detail which clusters might be suitable for higher levels of growth under an "accessibility-led" option as compared the emerging "balanced" approach contained within the Plan. In conclusion, the appraisal of the alternative concluded:

- positive effects for both alternatives in terms of the accessibility topic with the SA unable to differentiate between them;
- A preference for an accessibility-led alternative in terms of the biodiversity and transport topics, albeit against a backdrop that the overall significant effect in respect of both alternative was neutral and the distinction drawn in terms of biodiversity was marginal;
- A moderate or uncertain negative impact for both alternative in respect of the climate change mitigation topic with a marginal preference for an accessibility-led alternative;
- A preference for the emerging preferred alternative in regards to the historic environment theme, albeit again against a backdrop of an overall neutral impact and recognising some uncertainty in this conclusion;
- A positive impact of the emerging preferred approach compared to a neutral impact for the accessibility-led alternative in respect of housing. Although it should be noted the positive effect was only considered to be of moderate or uncertain significance.

3.20 In terms of overall conclusions, the SA continues to present a finely balanced argument stating that the "appraisal serves to highlight that there is a very clear "housing" argument in favour of" the emerging preferred approach but recognising that there are arguments in favour of an accessibility-led option and that there remains a considerable degree of uncertainty related to all conclusions. Ultimately, it is for the Council, as decision makers, to assign a degree of importance / weight in the decision-making process to the outcomes for the different topic area.

3.21 In regards to the concerns around the highly interrelated issues of climate change mitigation and transport it needs to be recognised that the VCHAP cannot be seen in isolation. The VCHAP forms one specific element of the emerging Local Plan for the whole of Greater Norwich. When Greater Norwich is considered as a whole

approximately 90% of planned growth within Greater Norwich is focused in and around the urban area around Norwich, the Market Towns and the largest villages with best accessibility. Indeed, the amount of additional development allocated to the South Norfolk Village Clusters equates to a little less than 2.5% of the total new growth planned in Greater Norwich between 2018 and 2038. Therefore, the element of this 1,200 within the more modestly served villages of South Norfolk, consistent with the balanced approach, will be a very small fraction of planned growth. It may reasonably be argued that this scale of growth is unlikely to meaningfully change the overall increase journeys, and consequential impacts, at the strategic level. In regard to consequential impacts (in particular transport emissions), this is particularly the case when considered against a backdrop of changes towards electrification of personal transport and the likelihood of increased incidence of home and remote working.

3.22 The positive impacts identified around housing is consistent with importance placed on this topic within the emerging plan itself. With the plan also giving greater emphasis on the benefits of supporting local infrastructure and, where appropriate, addressing local infrastructure issues acknowledged in the communities topic of the SA.

3.23 In addition to the consideration of alternatives in Part 1, Part 2 of the draft SA also appraises the impact of the emerging preferred strategy overall. When considered as a whole, the SA concludes positive effects against the baseline against eight topic areas: accessibility, biodiversity, communities, historic environment, housing, landscape, transport and water. A negative impact remains in respect of climate change mitigation. This significant number of additional positives in the overall appraisal of the plan is attributed to the “very detailed and well-evidenced site-specific policy” that it contains. The only formal policy recommendation put forward in the SA is that care is taken with regards to the policy requirement for avoiding / mitigating biodiversity impacts at those sites that are in proximity to a nationally or internationally important site for biodiversity. The impact of the plan on such sites is considered under the summary of the Habitat Regulations Assessment (HRA) below.

3.24 Overall, the approach set out within the emerging preferred option of the VCHAP is considered to be broadly consistent with the finding of the SA and as such represents an appropriate strategy. Although it should be recognised that the distinction between the two reasonable alternatives remains finely balanced.

Habitat Regulations Assessment

3.25 The purpose of a Habitat Regulations Assessment (HRA) is to determine if a plan or project may affect the particular features of a protected habitats site before deciding whether to undertake, permit or authorise it.

3.26 There are two principal routes by which new residential development sites in the VCHAP may impact on habitats sites. The first is increased recreational pressure caused by a growing population, in part fuelled by new housing, which negatively impacts on the protected sites. This is relevant to all sites in the VCHAP. The impacts of increased recreational pressure will be addressed through the

developer contributions towards the Council's adopted policy on Green Infrastructure and Recreational Avoidance and Mitigation (GIRAMS).

3.27 The second routes relates to the impact of development on the water environment. Impacts can result from increased abstraction to meet the demand for potable water, or through nutrient enrichment of waterways as a result of increased foul and surface water discharges that impact upon certain protected wetland sites. The second issue is particularly relevant to those VCHAP sites that lie within catchments that are affected by nutrient neutrality constraints. Overall, the assessment concludes that water quantity issues will be addressed through higher-level water planning alongside the proposed policy of the GNLP. In regard to nutrient enrichment the HRA identified that where significant impacts might occur, this impact will be addressed through a policy within the emerging GNLP. This policy is expected to restrict development in affected catchments until appropriate mitigation is in place. Such mitigations are likely to be delivered through a range of measures including the Norfolk authorities emerging Nutrient Neutrality mitigation scheme, the emerging Natural England mitigation scheme and in some instances developer-led mitigation. Although developer led-mitigation is significantly less likely on smaller sites.

3.28 Due to the absence of an adopted Nutrient Neutrality mitigation scheme it is not possible for the HRA to conclude that the plan will have no impact on protected sites at this point in time. However, there is a realistic likelihood that by the point of submission there will be much greater certainty in respect of the mitigation. The HRA will need to be updated once the GNLP policies have been updated to address the nutrient neutrality issue.

Water Cycle Study

3.29 The Water Cycle Study (WCS) assesses the impact of development on water supply and foul water disposal capacity. There are a notable number of sites within the plan that are potentially affected by constraints or uncertainties in relation to the ability to connect to, or the capacity of existing foul water disposal infrastructure. Where such constraints exist this is recognised in the policy wording and requirements for investigation as part of any future planning application. The delivery of constrained sites are more likely to be towards the end of the plan period allowing time for infrastructure constraints to be overcome.

Strategic Flood Risk Assessment

3.30 The Strategic Flood Risk Assessment (SFRA) assessed the extent to which identified allocations sites are affected by significant flood risk. This assessment has informed the site selection process. Where constraints that can reasonably be expected to be overcome have been identified this has been recognised within the relevant policy wording with specific investigations being required. Overall, it is not considered that the SFRA identifies that any of the proposed allocations are subject to flood risk issue that cannot reasonably be expected to be overcome.

Viability

3.31 As part of the preparation of the VCHAP an assessment has been undertaken of the viability of development sites in South Norfolk villages. Given the significant number of allocations, non-specific site typologies were used as the basis of this assessment. Specifically, an assessment has been made of 12, 20 and 50 home South Norfolk village sites. When assessed using current industry standard Building Cost Information Service (BICS) construction data each of the different types of sites assessed show a significant revenue surplus. This surplus is in addition to the target developer profit.

3.32 Further sensitivity analysis of build costs has, however, also been undertaken. This was undertaken to consider the potential impact of inflation above those shown in the most recent BICS data. If build costs from December 2020 to now are inflated in line with the retail price index (RPI) and this is used to substitute BICS data, then viability is significant less favourable. Whilst all the typologies assessed continue to make a profit, the revenue surplus falls below 0 for the 15 and 20 home typologies. This does not been a site in unprofitable, but rather that a developer would need to accept a profit on Gross Development Value lower than the 20% target value or that land values or contributions would need to reduce. This change reflects the particularly challenging economic situation currently, with increases in build costs increased by around 17% from 2020 values using the approach taken for the sensitivity analysis. It is notable that at a 17.5% profit level the 20 home typology does generate a small surplus and the 15 home typology only a marginal deficit.

3.33 It should of course also be noted that the VCHAP is a long-term plan looking ahead to 2038 and therefore over a period that is likely to experience a range of economic circumstances.

Next Steps …

3.34 Subject to relevant committee approvals, the draft plan will be published between 23 January 2023 and 6 March 2023 during which time representations on the legal compliance and soundness of the plan can be submitted.

3.35 Following completion of the Regulation 19 stage, should, taking account of representation submitted, it still be considered that the plan is Sound and ready for examination Council approval will be asked to submit the plan to the Secretary of State for independent examination. This decision is currently expected to be before Council in June/July 2023.

Consultation Proposals

3.36 The publication of a draft Local Plan prior to its submission to the Secretary of State for Independent Examination is a formal stage of plan making, the purpose of which is to allow stakeholders to make representation about the legal compliance or soundness of a plan for consideration by an Independent Inspector(s). This is different to earlier Issues and Options stages where consultation is intended to help shape the content of the final version of the plan.

3.37 To this end, the plan will be published online through the Council's planning consultation portal: Jdi. Representations will be able to be made through the consultation portal itself or by email or in hard copy using a prescribed format in line with the relevant regulations.

3.38 To support the publication it is intended that Officers will hold a briefing for Parish Councils. It is intended that this will be a hybrid in person and virtual event. In addition, all those who have previously registered their interest in the plan will be notified of the publication of the plan. A press release will also be issued relating to the publication of the document.

3.39 Hard copies of the consultation document will be deposited at the Thorpe Lodge Council Offices and the Octagon in Diss. The main document will also be made available at local libraries. The Council's virtual exhibition that supported the Regulation 18 Issue and Options consultation on the Plan will also be updated for the publication stage. It is not currently intended that the Officers will hold physical exhibitions with the community to support this stage of the plan making process.

4. Proposed action

4.1 It is proposed that Cabinet agree to publish the Pre-Submission Version of the South Norfolk Village Cluster Housing Allocation Plan in accordance with Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012 (as amended).

5. Other options

5.1 If Cabinet consider that specific amendments to the plan are required then it may recommend that these changes are made prior to its publication. Such changes would need to be consistent with requirement for the plan to be legally compliant and consistent with the tests of soundness. If substantive changes are recommended it is likely that the research and fact-finding studies and assessments that underpin the plan will need to be reviewed and updated. This would delay publication of the plan.

5.2 If Cabinet considers that the plan is unlikely to be found legally compliant or sound, then Members may also instruct Officers to review or undertake further assessment into the allocation of sites within the Village Clusters Plan. The impact on the timetable for plan production would depend on the extent of the further assessment sought.

5.3 Members may also resolve not to publish the VCHAP at this time for any other reason. Any such decision should take account of the relevant legal requirements and tests of soundness for Local Plans. In addition, such a decision should take into account the chance that significant delay to the production of the plan increases the risk that the need for homes within South Norfolk will not be met and/or that elements of the Council's Development Plan will be found to be out-of-date, with the so called "tilted balance" of the presumption in favour of sustainable development needing to be applied in determining applications. The tilted balance requires that applications are approved unless the adverse impacts of doing so

would significantly and demonstrably outweigh the benefits when assessed against local and national policies as a whole.

6. Issues and risks

6.1 **Resource Implications** – Many aspects of plan production are being met within the existing resources of the Place Shaping Team and specific budget that has been made available for the completion of this document.

It is currently expected that the costs associated with the items set out above can be met through the budget made available for the Village Cluster Plan. The unspent budget will however need to be rolled forward in to at least the next financial year to support the final stages of plan production.

6.2 **Legal Implications** – Reasonable and proportionate steps have been taken to ensure that the plan has been prepared in accordance with the relevant legislation and regulations. Public and stakeholder scrutiny is a fundamental part of the plan making process. This includes the right to submit a legal challenge. Officers will take further advice on legal implications, as necessary, as part of the plan making process.

6.3 **Equality Implications** – Stakeholder engagement, in accordance with the Council's Statement of Community Involvement (SCI) has been undertaken as part of the preparation of the plan as required by regulations. An Equalities Impact Assessment (EQIA) was prepared to accompany the Regulation 18 consultation version of the plan. This has been updated for the Regulation 19 publication of the plan.

6.4 **Environmental Impact** – A Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), and Habitat Regulations Assessment (HRA) has been prepared alongside the plan. These assessments and the plan itself will be supported by a proportionate evidence base, which will include a Water Cycle Study (WCS) and Strategic Flood Risk Assessment (SFRA).

6.5 **Crime and Disorder** – it is not considered that the preparation of the plan will have significant material implications in terms of Crime and Disorder.

6.6 **Risks** – Other than as set out above, the key risks associated with the plan are as follows:

6.6.1 **Greater Norwich Local Plan (GNLP)** – the South Norfolk Village Clusters Housing Allocation Plan (VCHAP) is reliant on the GNLP. In particular, it is reliant on the GNLP to establish the principle of Village Clusters as a basis on which to allocate housing in smaller settlements, and also in setting the overall distribution of development including the housing requirement for the Village Clusters. It is also reliant on the GNLP in respect of matters such as the strategic mitigation for the impact of development on internationally protected species and habitats. Substantial delays to, or modification of the GNLP would impact on the timetable for the VHCAP and may impact on its content. If the GNLP were to be found unsound at examination, or for other reasons

withdrawn, then it would not be possible to progress with the VCHAP. The GNLP is being prepared by the GNLP team and project assurance processes to ensure, as far as possible, the soundness of the GNLP have been put in place in consultation with the Project Sponsor and relevant senior staff of the partner authorities.

6.6.2 **Consistency with National Policy** – In developing its site assessment criteria the Council has sought to strike a balance between promoting housing development that will enhance or maintain the vitality of rural communities, whilst providing opportunities for sustainable and active travel commensurate with a rural area. A number of representations and objections have been received through consultation to this approach and whether this approach would result in an appropriate level of access to services and facilities. Alongside the individual suitability, availability and deliverability of sites, the questions of whether or not the Council has struck the right balance in respect of these key planning issues is likely to be the main area of challenge at any examination of the Village Cluster plan. This is particularly relevant given the changes to the criteria around access to services and facilities used within the VCHAP site assessment when compared to those within the Norfolk HELAA.

6.6.3 **Sustainability Appraisal, incorporating Strategic Environmental Assessment (SA/SEA)** – The preparation of an SA/SEA is a legal obligation of the plan making process. Part of the process is the equitable consideration of reasonable alternatives. Members have previously expressed a preference for a particular approach to the distribution of development across the South Norfolk Village Clusters and size of potential allocation site. Members should have regard to the conclusions of the SA/SEA and demonstrate that they have engaged objectively with reasonable alternative approaches to distribution and why, in light of the SA/SEA findings, it is considered that the selected approach is justified. This is likely to be a key issue for any independent examination of the VCHAP. The Council's SA/SEA has been prepared by an independent consultant and findings of the SA/SEA has been reported to members at appropriate junctures throughout the plan making process. The Regulation 19 version of the Sustainability Appraisal will be published alongside the main document and key findings are documented within this report.

6.6.4 **Evidence Base** – A range of evidence base documents have been prepared to support the preparation of the South Norfolk Village Cluster Housing Allocation Plan. At the time of writing two core documents: the Water Cycle Study and Strategic Flood Risk remain in draft, awaiting final feedback from technical stakeholders.

These documents have been prepared by suitably qualified consultants appointed by the Council and therefore are considered to be reliable. Notwithstanding this there remains a risk that further changes may be needed to these documents, which may result in consequential amendments being needed to the VCHAP. Substantive changes may require the Regulation 19 publication stage to be repeated.

The identification of two of the three typologies assessed in the viability assessment falling below the target developer profit on Gross Development Values (GDV) is likely to be a key consideration for an examining inspector and may increase pressure to consider increasing the size of proposed allocations or looking to replace smaller allocations with larger ones.

6.6.5 **Neighbourhood Plans** – Allocations of land for housing in the Village Clusters of Roydon, Scole and Burston with Shimpling are to be made through the Diss and District Neighbourhood Plan. Allocations of land for housing in the Village Cluster of Dickleburgh are to be made through the Dickleburgh Neighbourhood Plan. Good progress is being made with the Diss and District Neighbourhood plan, which has now reached the examination stage. The Dickleburgh Neighbourhood plan has not yet been published for its pre-submission consultation. The steering group has however confirmed their commitment to making appropriate allocations of land for housing and have informed officers that a Regulation 14 consultation will be undertaken in the near future.

Notwithstanding progress and commitment provided there remains a risk that the Neighbourhood plans will not progress as expected or will not be successful at referendum. These risks are being managed through ongoing engagement with the Neighbourhood Plan groups as part of the plan making process.

7. Conclusion

7.1 The overall distribution of sites across the South Norfolk Villages is considered to be an appropriate strategy for the South Norfolk villages. This judgement takes account of the dispersed rural geography of the district, the aspiration for development in villages to promote social sustainability by supporting rural life and services and the overall strategic scale of growth in the clusters as a proportion of that proposed across Greater Norwich as a whole.

7.2 The sites identified within the pre-submission version of the VCHAP have been subject to a robust site assessment process. It is considered that there is a reasonable prospect that all of the sites identified will be developed within the plan period. Where opportunities to address local infrastructure issues exist through the proposed allocations these are identified in the allocation policy. Similarly, where constraints have been identified these are also identified in the policy to ensure that these issues are appropriately addressed at the application stage.

7.3 On the basis of the above, it is considered appropriate to publish the pre-submission version of the VCHAP under Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012, as amended. Should further issues of significance be raised in response to the publication of the document then the Council may choose to undertake further work before submitting the plan for independent examination, although this may require the repetition of the Regulation 19 stage.

8. Recommendations

8.1 Cabinet to agree to:

1. Publish the pre-submission version of the South Norfolk Village Cluster Housing Allocation Plan (VCHAP) under Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012, as amended;

   and,

2. Delegate authority to the Assistant Director for Planning in consultation with the Portfolio Holders for External Affairs and Policy and Stronger Economy to:

   a. make minor or factual corrections to the VCHAP prior to its publication, and;

   b. finalise evidence base and other support documents in connection with the publication of the VCHAP.

Background papers

Policies Maps

Report of Consultation

Sustainability Appraisal

Habitat Regulations Assessment

The background papers associated with this report can be found via the Council's planning consultation webpage by clicking on this link. South Norfolk District Council - Opus Consult (oc2.uk).

South Norfolk Local Plan

South Norfolk Village Clusters Housing Allocation Plan

December 2023

Working with you, working for you

South Norfolk Village Clusters Housing Allocations Plan Publication Draft Plan

Contents

Introduction and Background 7

The Plan Objectives 12

SNVC Objective 1 - Meet housing needs 12

SNVC Objective 2 - Protecting village communities and support rural services and facilities 12

SNVC Objective 3 - Protect the character of villages and their settings 12

The Assessment of Sites 13

Evidence Base 14

Monitoring 16

Village Cluster Chapters 17

1. Alburgh and Denton 17
2. Alpington, Yelverton and Bergh Apton 19

VC ALP1 21

3. Aslacton, Great Moulton and Tibenham 25

VC ASL1 26

VC GRE1 28

VC GRE2 28

4. Barford, Marlingford, Colton and Wramplingham 30

VC BAR1 32

5. Barnham Broom, Kimberley, Carleton Forehoe, Runhall and Brandon Parva 35

VC BB1 36

6. Bawburgh 39

VC BAW1 39
7. Bressingham 42
VC BRE1 42
8. Brooke, Kirstead and Howe 45
VC BRO1 46
9. Bunwell 49
VC BUN1 50
VC BUN2 52
10. Burston, Shimpling and Gissing 54
11. Carleton Rode 56
VC CAR1 56
12. Dickleburgh 58
13. Ditchingham, Broome, Hedenham and Thwaite 60
VC DIT1 62
14. Earsham 65
VC EAR1 65
15. Forncett St Mary and Forncett St Peter 68
16. Gillingham, Geldeston, and Stockton 69
VC GIL1 70
VC GEL1 72
17. Hales and Heckingham, Langley with Hardley, Carleton St Peter, Claxton, Raveningham and Sisland 75
VC HAL1 77
VC HAL2 79
18. Hempnall, Topcroft Street, Morningthorpe, Fritton, Shelton and Hardwick . 81
VC HEM1 83
19. Heywood 86
20. Keswick and Intwood 87
21. Ketteringham 89
22. Kirby Cane and Ellingham 90
VC ELL1 90
VC ELL2 92
23. Little Melton and Great Melton 95

VC LM1 96
24. Morley and Deopham 100
25. Mulbarton, Bracon Ash, Swardeston and East Carleton 101
VC MUL1 103
VC SWA1 105
VC SWA2 107
VC BRA1 108
26. Needham, Brockdish, Starston and Wortwell 109
VC NEE1 111
VC WOR1 113
VC WOR2 115
27. Newton Flotman and Swainsthorpe 117
VC NEW1 118
VC NEW2 119
28. Pulham Market and Pulham St Mary 121
VC PSM1 122
29. Rockland St Mary, Hellington and Holverston 125
VC ROC1 126
VC ROC2 128
30. Roydon 131
31. Saxlingham Nethergate 133
32. Scole 134
33. Seething and Mundham 136
VC SEE1 137
34. Spooner Row and Suton 139
VC SPO1 139
VC SPO2 141
VC SPO3 143
VC SPO4 144
35. Stoke Holy Cross, Shotesham and Caistor St Edmund & Bixley 146
VC STO1 148
36. Surlingham, Bramerton and Kirby Bedon 150
37. Tacolneston and Forncett End 152

VC TAC1 153
VC TAC2 155
38. Tasburgh 156
VC TAS1 156
39. Tharston, Hapton and Flordon 159
40. Thurlton and Norton Subcourse 161
VC THU1 162
VC THU2 164
41. Thurton and Ashby St Mary 166
42. Tivetshall St Mary and Tivetshall St Margaret 167
VC TIV1 167
43. Toft Monks, Aldeby, Haddiscoe, Wheatacre and Burgh St Peter 169
VC HAD1 171
VC BUR1 174
44. Wacton 177
45. Wicklewood 178
VC WIC1 178
VC WIC2 180
VC WIC3 181
46. Winfarthing and Shelfanger 183
VC WIN1 184
VC WIN2 185
47. Woodton and Bedingham 188
VC WOO1 188
48. Wreningham, Ashwellthorpe and Fundenhall 191
VC ASH1 192
Monitoring Framework 195
Glossary 197
Appendix A: List of New and Carried Forward Allocations 211
Appendix B: Summary of Changes to Settlement Limits 215
Appendix C: Housing Trajectory 217

Introduction and Background

The South Norfolk Village Clusters Housing Allocations Plan (The Village Clusters Plan) aims to deliver sustainable growth within the villages of South Norfolk. The Village Clusters Plan has been developed alongside the Greater Norwich Local Plan (GNLP) and in accordance with Government's national planning policies and guidance. The Plan allocates a series of smaller sites, typically within the range of 12 to 50 homes, across the 48 Village Clusters in South Norfolk, to accommodate at least 1,200 new homes in total. The Plan also defines the Settlement Limits for the villages within these clusters, making provision for further smaller sites and incorporating revisions to reflect development that has occurred, or has been permitted since the boundaries were last updated.

The Village Clusters Plan establishes the Objectives of the Plan, as well as detailed policies for those sites allocated within it. Following representations received in response to the Regulation 18 consultation it was determined that the inclusion of Core Policies would be a duplication of planning policies set out elsewhere, either in national policy or in the Local Plan, and therefore these have not been carried forward in this Plan.

The production of the South Norfolk Village Clusters Housing Allocation Plan has been supported by a Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA) which evaluate the plan and are also available for comment on legal and soundness compliance.

National Policy

Government planning policy is set out in the National Planning Policy Framework (NPPF). In terms of rural housing, paragraph 79 of the NPPF states that:

> 'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'

This underpins the Village Clusters Plan, which looks at settlements both individually, but also, importantly, as part of a cluster of settlements many of which share local facilities and services.

Paragraph 69 of the NPPF notes the importance of small and medium sized sites, up to 1 hectare in size, in contributing to meeting housing needs, particularly in terms of

the ability to deliver those sites quickly. This paragraph also encourages Councils to have Local Plan policies which support windfall development on non-allocated sites. The scale of the sites identified and allocated through the Village Clusters Plan, as well as the provision made for windfall development though amendments to existing Settlement Limit boundaries, delivers on these requirements.

The Greater Norwich Local Plan (GNLP)

South Norfolk Council is working with Broadland Council and Norwich City Council to produce the Greater Norwich Local Plan (GNLP). Amongst other things, the GNLP identifies how many homes need to be built between 2018 and 2038. The basis for calculating the future requirements is the Government's December 2020 'standard method' for identifying local housing need. More details on the GNLP can be found at www.gnlp.org.uk.

The GNLP strategy focuses most of the planned growth in a strategic growth area that covers the Broadland Growth Triangle to the north-east of Norwich, Norwich and its wider urban area, and the A11 corridor including Hethersett and Wymondham. The latter is also referred to as the Cambridge Norwich Tech Corridor. Outside of these strategic growth areas the GNLP also allows for further growth in five Main Towns and the larger 'Key Service Centre' villages (such as Hingham, Loddon/Chedgrave and Poringland/Framingham Earl). The draft GNLP also requires some development to occur on smaller sites in the Village Clusters, as described in the GNLP such provision is made as it '*has the benefit of supporting small-scale builders, providing choice for the market and helping to ensure the delivery of housing in popular village locations.*'

Overall, 5.5% of the GNLP growth is assigned to the Village Clusters in South Norfolk. Half of that growth has either already been built during 2018/19 and 2019/20, or is on sites which already have planning permission, or are allocated in the current South Norfolk Site Specific Allocations and Policies (2015). All bar two of those 2015 Local Plan allocations are carried forward in this Plan. To meet the remaining requirements of the GNLP, the **South Norfolk Village Clusters Housing Allocations Plan needs to identify sites for at least a further 1,200 new homes**. These are made up of:

Source	**Dwellings**
New Village Cluster Plan Allocations	1,102
Carried Forward 2015 Allocations	Net Gain of 4
2015 Allocations not carried forward	Loss of 13
Neighbourhood Plan Allocations	135
Total	**1,228**

A list of sites that make up these numbers can be found in Appendix A.

Non-housing sites in the South Norfolk Village Clusters, such as employment allocations or stand-alone sites for specific uses, such as sports and recreation facilities, are still dealt with through the GNLP.

Village Clusters

There are 48 Village Clusters in South Norfolk. Some contain a single parish, whilst others contain multiple parishes. In line with the approach set out in the GNLP, each one is centred around the local Primary School. Where that primary school is within a larger settlement outside of a Village Cluster, the remaining rural parishes still form a cluster in the Village Clusters Plan e.g. Brockdish, Needham, Wortwell and Starston are within the catchment of Harleston Primary School, but those four parishes form a cluster in this Plan. The Primary School catchment has been taken as a proxy for social sustainability, However the Council also recognises that many other facilities are important to local communities and has therefore undertaken an audit of other facilities and services within the clusters, to inform the Site Assessment process (see details below).

The sites within the Village Clusters are split into two categories

- new Allocations, these are sites typically proposed for between 12 to 50 dwellings, which will go to meeting the 1,200 dwelling requirement in the GNLP, noted above; and
- Settlement Limit Extensions, for sites smaller than 12 dwellings, these will not count towards the 1,200 dwelling requirement, but will help ensure that the 'windfall allowance' in the GNLP is achieved.

The threshold of 12 dwellings is consistent with the GNLP and reflects the fact that sites smaller than this are less likely to achieve the required element of affordable housing. Settlement Limit extensions also offer the opportunity for 'self-build' development, as required through Government policy, particularly where those sites have been proposed by the site owner who wishes to build or commission their own home.

The Regulation 19 Publication of the South Norfolk Village Clusters Housing Allocation

This is the Publication draft version of the South Norfolk Village Clusters Housing Allocation Plan (also referred to as the 'Regulation 19 Pre-submission Draft Plan').

This document sets out the Council's chosen Plan which it intends to submit for Examination in Public.

The Regulation 19 version follows on from the earlier Regulation 18 consultation version which sought views on the sites that had been promoted to the Council for consideration, as well as on other changes to the Settlement Limits and the Plan Objectives. During the current Regulation 19 publication period, comments must be limited to matters of legal and soundness compliance[1] and to be duly made representations must be submitted during the specified time period, further details can be found at www.southnorfolkandbroadland.gov.ukvchap. Following the close of the publication period, the Plan, any duly made representations, and the supporting evidence documents will be submitted to the Planning Inspectorate for Examination by a Government appointed Planning Inspector. The duly made representations will help to inform the content of the Examination of the Plan.

Each allocation comprises both a site specific policy and background text. The background text sets out the key issues identified during the evidence gathering stage, as well as matters that the Council wishes to bring to the attention of the site developer. This supporting information should be read in conjunction with the specific policy requirements as it has informed the requirements of the policy.

Maps detailing the boundaries of the site have been produced for each of the allocations, and are included alongside the policies. Also included within this document are maps that illustrate the Settlement Limits, which incorporate amendments since the 2015 Local Plan as set out in the relevant chapters of the document. A separate suite of maps has been created as part of the background evidence which show all of the sites that have been promoted through the Village Cluster Housing Allocation Plan process.

Existing Planning Policies and Neighbourhood Plans

Whilst the South Norfolk Village Clusters Housing Allocation Plan has been prepared alongside the GNLP, this is in the context of other planning documents which already exist or are also being prepared.

Currently Local Plan Policies for the village cluster settlements in South Norfolk are set out in variety of documents, these include:

- The Joint Core Strategy for Broadland, Norwich and South Norfolk (2014), which sets out the strategic planning policies covering the three Districts;

[1] Advice on what soundess matters are can be found in the National Planning Policy Framework

- The South Norfolk Site Specific Allocations and Policies Document (2015), which sets out allocations for housing and other uses;
- The South Norfolk Development Management Policies Document (2015) which sets out a number of non-site specific policies applicable many types of development (highways, parking, design, landscaping, neighbour amenity etc.) as well as criteria based polices for various different types of development, and policies applying to particular landscape designations.

When adopted the GNLP will replace the existing Joint Core Strategy (JCS) and will also replace the parts of the South Norfolk Site Specific Allocations and Policies relating to the larger settlements in South Norfolk. The Village Clusters Plan will then replace the remainder of the Site Specific Allocations and Policies document. Sites that were allocated in the 2015 Site Specific Allocations and Policies document but have either not yet come forward for development, or have not been substantively constructed, have been reviewed and included in the Village Clusters Plan as 'carried forward' allocations if the Council considers that the site remains a reasonable option for development. These allocations have been updated to reflect subsequent planning permissions and/or further information about the site(s) and local context that has emerged through the development of this Plan. The 2015 Development Management Policies Document will remain in place.

Some Town and Parish Councils have, and are continuing to, produce Neighbourhood Plans, which sit alongside the Local Plan and when adopted, are also used to determine planning applications. Most of these Neighbourhood Plans include more detailed Development Management policies, which aim to shape development proposals to better reflect local circumstances. However, currently two Neighbourhood Plans, Dickleburgh and Diss and District (which includes the Village Cluster parishes of Burston, Roydon and Scole) are proposing to make their own allocations and our approach to these clusters is set out in the specific chapters below. For more information about Neighbourhood Plans in South Norfolk, please visit https://www.southnorfolkandbroadland.gov.uk/neighbourhood-plans.

The Plan Objectives

The following sets out the three Objectives which the Village Clusters is aiming to achieve through the allocation of appropriate sites and the amendment of Settlement Limits.

SNVC Objective 1 - Meet housing needs

Deliver housing in accordance with the Greater Norwich Local Plan housing target for the South Norfolk Village Clusters through the allocation of suitable, viable and deliverable development sites for housing.

Provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of their life cycle e.g. first time buyers, those seeking family housing and those looking to downsize or move to more suitable accommodation in later life.

Provide opportunities for 'self-builds' through the extension or amendment of settlement boundaries to allow 'in-fill' development in appropriate locations.

SNVC Objective 2 - Protecting village communities and support rural services and facilities

Provide opportunities for new housing development in a range of settlements within the village clusters, meeting the needs of a range of occupiers with the potential to support different local services and facilities. Seek to deliver improvements to local services, facilities and infrastructure where justified and appropriate.

SNVC Objective 3 - Protect the character of villages and their settings

Ensure that the scale, location and density of housing is well related to the form and character of existing villages, protects the historic environment, including protected landscapes, and ensures appropriate landscaping measures are delivered as part of new development.

The Assessment of Sites

The Council only assessed sites put forward to us for consideration by (or on behalf of) the landowner or the potential developer of the site. The primary reason for this was to ensure that there is a reasonable prospect that the allocated sites come forward within the lifetime of the Plan. Many of the sites were initially put forward as part of the Greater Norwich Local Plan (GNLP) process, which meant they were considerably larger than what is being sought in the Village Clusters Plan. However, in March 2020 the Council sought to contact all of the site promoters to ask them whether they wished to amend their sites to take into account the requirements of the Village Clusters Plan i.e. for smaller sites which reflect the smaller, rural communities that they will be a part of, and which will contribute to the smaller sites requirement in the NPPF. A further 'call for sites' was included in the GNLP Regulation 18 consultation between January and March 2020, and again during the Regulation 18 consultation for the Village Clusters Plan during summer 2021. In total over 500 sites were assessed during this process.

The assessment of sites was undertaken in a consistent manner. The starting point was the Norfolk-wide Housing and Economic Land Availability Assessment (HELAA) Methodology (2016), which has been agreed as part of the Norfolk Strategic Planning Framework process and is considered to be consistent with Government guidance. The Norfolk HELAA methodology also forms the basis of the GNLP site assessment process.

Whilst the HELAA provides a starting point, the full site assessment was a more detailed process which included looking at the planning history of the site, undertaking a site visit and applying some more detailed criteria. Most noticeably the site assessment added criteria relating to the local Landscape Character Assessment, Better Broadband for Norfolk and revised the distance to services criteria to better reflect the rural nature of the Village Clusters Plan. Specifically regarding the latter, the Village Clusters assessment widened the number of services to which distances to/from the site have been assessed to include some which are characteristic of rural villages, for example, a village/community hall and pub, as well as pre-school provision and formal sports facilities. The maximum distance to services was also increased, to reflect the more dispersed pattern of development across the South Norfolk Village Cluster area. However, the choice of sites was still informed by the need for safe and convenient access to those services, as well as by an accompanying Sustainability Appraisal, see below.

The Site Assessments were also supported by a **Technical Consultation** with both internal consultees on landscape, heritage and environmental protection issues, as well as a range of external stakeholders, on issues such as highways, utilities and minerals and waste. The technical consultation also included issues of flood risk and

ecology, and technical comments on these issues were provided in response to the Regulation 18 consultation. Post the Regulation 18 consultation further discussions took place with some of the technical consultees in order to seek additional information or clarify specific matters raised to support the choice of allocated sites and Settlement Limit changes.

A copy of the HELAA Methodology and Site Assessment form for the Village Clusters Plan form part of the evidence base for this Plan.

Evidence Base

Much of the evidence base to the Village Cluster is shared with the GNLP. Of particular relevance are those listed below:

- Greater Norwich Water Cycle Study (March 2021), which indicated that sites in some Village Clusters locations may need to be phased in order for infrastructure to be suitably upgraded prior to development, which has subsequently been supplemented by a specific South Norfolk Village Clusters Addendum;
- The Level 1 Strategic Flood Risk Assessment (November 2017), which has been used as part of the Village Clusters Site Assessment Process; and
- The GNLP Viability Appraisal (December 2020), which demonstrates that the type of sites being allocated through the Village Clusters Plan can be viably delivered with the relevant supporting infrastructure and affordable housing which has subsequently been supplemented by an Appraisal using more recent data specifically for the South Norfolk area.

Specific supporting evidence base documents have been prepared to accompany this plan, these are listed below:

- Sustainability Appraisal (SA);
- Habitats Regulation Assessment (HRA);
- Heritage Impact Assessments (HIA);
- Landscape and Visual Appraisal (LVA);
- Stage 2 Strategic Flood Risk Assessments (SFRA);
- South Norfolk Village Clusters Water Cycle Study (WCS) and
- South Norfolk Village Clusters Viability Appraisal (VA).

<u>Sustainability Appraisal</u>

The preparation of the Scoping Report for the SA involved consultation with specified bodies in accordance with legal requirements. This consultation was undertaken in

September and October 2020. A number of SA commentaries have been produced for the Council as part of the decision making process of selecting the preferred sites, these have subsequently been incorporated into the published Sustainability Appraisal. The final SA presents an assessment of the likely sustainability impacts of the proposals set out in the Village Cluster Plan, as well as an assessment of the Reasonable Alternative (RA) options for development.

Habitats Regulation Assessment

The Habitat Regulations Assessment (HRA) has been prepared to identify European sites within or near the Village Cluster area that may be directly, or indirectly, affected by the allocations within this Plan and concludes on whether there are any significant effects likely as a result of the Plan proposals.

Heritage Impact Assessments

The Heritage Impact Assessments (HIA) have been prepared following comments received from Historic England during the Regulation 18 consultation. These comments identified several preferred and shortlisted sites that should be subject to a HIA to review the impact that they may have on designated and non-designated heritage assets and ultimately their suitability for inclusion in the Plan. As well as these sites, the Council reviewed the additional sites submitted in response to the 'Call for Sites' during the Regulation 18 period and identified others that would benefit from an HIA. These documents have helped to shape the site selection process, as well as informed the detailed allocation policies for the preferred sites.

Landscape and Visual Appraisals

Similarly, in response to comments received during the Regulation 18 consultation, it was determined that the site selection process would benefit from landscape and visual appraisals to consider in greater detail the landscape and visual impact of the proposed development sites. Landscape Visual Appraisals (LVAs) have been completed for all of the preferred sites with the findings of these appraisals being incorporated into the site-specific policies where appropriate.

Strategic Flood Risk Assessment

A Stage 2 Strategic Flood Risk Assessment (SFRA) specifically focusing on sites within the South Norfolk Village Clusters area were undertaken as part of the

evidence base to inform the production of the Plan, and were updated following legislative changes made in Autumn 2022. These assessments continued the work that commenced as part of the GNLP evidence base.

Water Cycle Study

The South Norfolk Water Cycle Study (WCS) builds upon the WCS produced to support the production of the GNLP. The South Norfolk addendum provides specific information relating to the sites within the Village Cluster Plan area, taking into account existing commitments and development outside the Plan area that connects to Water Recycling Centres (WRC) within the Village Cluster Plan area.

Viability Appraisal

An updated Viability Appraisal has been prepared to support the Village Clusters Plan, which also looked at the potential impact of addressing Nutrient Neutral. The purpose of the South Norfolk VA was firstly to confirm that the small-scale sites in the South Norfolk Village Clusters locations remain viable taking into account the latest data, including increased building costs, and secondly to identify whether the development typologies identified would generate sufficient surplus, over and a normal developer profit to cover any increased costs associated with Nutrient Neutrality.

Monitoring

All Local Plan documents are monitored on an annual basis in order to assess the effectiveness of the policies and allocations they contain. The outputs of the monitoring of the currently Local Plan documents are published as part of the Joint Core Strategy for Broadland, Norwich and South Norfolk, Annual Monitoring Report. A Monitoring Framework is included within this document, which indicates how the effectiveness of the Village Clusters Plan will be measured.

Village Cluster Chapters

1. Alburgh and Denton

Form and character

Alburgh

Alburgh is a linear village of mainly single plot frontage development with a mixture of housing types forming a central core along The Street, and a short spur along part of Church Road. A ribbon of scattered farmsteads and dwellings extends northwards towards Mill Road, and an open area containing farmsteads and some isolated dwellings extends southwards towards Piccadilly Corner. The area is characterised by many hedgerows and a number of mature trees, and is generally surrounded by open fields affording distant views. The village is linked to Hempnall and the B1527 to the north via The Street; and is linked to the A143 to the south via Tunbeck Road and Station Road, thereby on to Beccles, Bungay, Harleston and Diss.

Denton

Denton is in two principal parts. The main part extends from part way up Trunch Hill in the south to Skinners' Meadow in the north. A smaller and more scattered part is situated a quarter of a mile to the north and includes Uplands Terrace and some development along Darrow Green Road. Development is generally single plot depth fronting the road, except Skinners' Meadow and Globe Close.

There are many scattered former farmhouses and conversions of former agricultural buildings. The attractive valley of the Beck runs through the extreme south of the parish with three tributaries flowing from the north. Trunch Hill runs down into the main valley. There are many trees and hedgerows particularly in the southern part of the parish which give it an attractive rural character

Services and Community Facilities

Alburgh has a village hall at the junction of Low Road and Church Road, with Denton's village hall situated west of the Norwich Road. Both villages share a primary school, which also offers preschool facilities. Alburgh has a daily bus service to Norwich.

Settlement Limit

Alburgh

The Settlement Limit has been drawn to include the main built-up area of the settlement around The Street. The remainder of Alburgh is very dispersed and

therefore unsuitable for the creation of a Settlement Limit without leading to significant development which would fundamentally alter the character of the area.

Denton

The Settlement Limit has been drawn to include the main built form of the settlement to allow for limited infill development only, due to the rural nature of the area and limited local facilities.

2. Alpington, Yelverton and Bergh Apton

Form and character

Alpington and Yelverton

The main built-up areas of Alpington and Yelverton form a contiguous settlement. Development is concentrated around Church Road and Wheel Road. There is also a significant area of development at Mill Road, Alpington. Small detached clusters of development exist to the west of the main built-up area on Burgate Lane and to the south on Church Meadow Lane in Alpington, whilst a small number of individual dwellings and farmsteads are dispersed throughout the remainder of both parishes.

The settlement has developed as a ribbon form along Church Road and Wheel Road, though significant post-war estate scale development has taken place in the parish north of Wheel Road and west of Church Road, resulting in a more nucleated settlement form for this part of the settlement.

The settlement is set in generally flat open countryside, although in the south of Alpington there is a small area of attractive valley landscape. The village is characterised by good areas of tree and hedge planting especially along Church Road, which together with its setting and views of the surrounding countryside give it an attractive rural character.

The western limit of the village along Wheel Road / Burgate Lane is clearly defined by a significant tree belt on the north side of the road, which together with open fields on both sides of the road maintains the separation between the main village and the small cluster of dwellings to the west. The A146 is 1km (0.6 miles) to the north and provides a good link to Norwich and Loddon whilst the B1332 lies immediately to the west of the parish providing good links to services in Poringland and also to Norwich and Bungay.

Bergh Apton

Development within the parish is relatively small scale and in clusters along Cookes Road and The Street, and a larger concentration of development along Mill Road and Threadneedle Street that has created a linear settlement form characterised by one plot depth development. The main areas of settlement in the village retain a rural character with no estate scale development whilst the remainder of the parish consists of isolated dwellings and farmsteads. The local road network comprises

rural roads. The A146 is to the north of the settlement and provides a good link to Norwich and Loddon.

Services and Community Facilities

The cluster's primary school lies at the main crossroads in Alpington. Further north on Church Road can be found the village hall, which also provides pre-school facilities. There is a limited bus service to Norwich and Beccles. Alpington also has a pub on Wheel Road.

Settlement Limit

Alpington and Yelverton

The Settlement Limit for Alpington and Yelverton has been drawn to include the main built form of the settlement and is centred around development along Church Road and Wheel Road, and the small, estate-scale developments north of Wheel Road and west of Church Road. Along Mill Road there is an area of development within Alpington Parish which is covered by the Bergh Apton Settlement Limit. As part of the preparation of this Plan a site located on land south of Bergh Apton Road and west of Nichols Road was promoted. Following an assessment of the site this land has been incorporated into the updated Settlement Limit.

Bergh Apton

The Settlement Limit has been drawn to include the three main areas of settlement within Bergh Apton. These are the linear development along Mill Road and Threadneedle Street; around the junction of Cookes Road and The Street and further south on The Street.

Site allocations

VC ALP1

The site lies west of Church Meadow and north of Fortune Green and is well located for pedestrian access to the services within the village.There is a single vehicular point of access from Church Meadow, plus an informal pedestrian access from footpath Aplington FP2/Yelverton FP4, which runs along the northern boundary of the site.

For highways safety, and to encourage sustainable transport options, offsite highways works will include: localised widening of Church Road, particularly in the vicinity of the Church Meadow junction; an improved crossing point between Church Meadow and Alpington with Yelverton Village Hall; and formalising the currently unmarked bus stops on Church Road. Alternative highways solutions may be agreed with the Highway Authority at the time of any planning application.

The site is visually well contained, but the protection and enhancement of the existing boundary hedgerows and trees surrounding the site will be required. The Veteran Tree in the northeast corner of the site is protected by a Tree Preservation Order, and development of the site should protect and enhance its setting.

The Stage 2 VC Strategic Flood Risk Assessment (SFRA) identifies a number of factors which need to be taken into account in developing proposals for this site, and indicates the need for a site-specific FRA, with the resultant strategy informing the layout of the development.

Although the site is 1.87ha, the allocation is for approximately 25 dwellings, reflecting the scale and density of the adjoining Church Meadow development and the need to address flood risk issues.

Policy VC ALP1: West of Church Meadow

1.87ha of land is allocated for approximately 25 dwellings.

The developer of the site will be required to ensure:

- **Access from Church Meadow, with off-site highways widening to Church Road, formalising the existing unmarked Church Road bus stops and improved crossing point to Alpington with Yelverton Village Hall;**
- **A site-specific Flood Risk Assessment (FRA) and strategy to inform the layout/development of the site, including access arrangements. The FRA must have regard to the requirements set out in the Stage 2 VC SFRA;**
- **Protection and enhancement of the setting of the Veteran Tree in the north-east corner of the site and of the mature hedges on the site boundaries;**
- **Pedestrian link to footpath Alpington FP2/Yelverton FP4, which runs along the northern boundary of the site;**
- **Minimise the impact on the residential amenity of properties adjoining the site through an appropriate site layout.**

VC BAP1

The site is south of Church Road, to the west of main village of Bergh Apton and is predominantly a brownfield site, having formerly been used as a concrete batching plant. The site is slightly detached from the existing clusters of development in Bergh Apton, however the Draft Conservation Area Character Appraisal (July 2022) notes that "Bergh Apton is best described as a parish of 'dispersed' settlement that has no really strong village 'core' in the physical sense". The closest cluster of dwellings, to the east on Church Road, includes a group of listed Tayler and Green dwellings, and any development will need to ensure the setting of those buildings is protected and enhanced.

The Council's Environmental Protection Team is aware that this is a brownfield site which has been subject to uses that have the potential to give rise to significant land quality issues. Having regard to this, along with the size of the site and sensitivity of residential development, it is considered that a Detailed Land Contamination Report (Phase One and Phase Two) is required as part of any planning application.

The site frontage allows for more than one point of access, and the Highway Authority would prefer to see a mix of frontage development and development accessed via non-adopted private drives. To deliver an appropriate layout, the site is likely to require an element of adoptable road, but a less formal approach would be sympathetic to this rural location. Church Road is rural in character, with no footways, and land should be dedicated for footway provision on the site frontage should this need to be implemented in the future. Whilst the historic use of the site previously generated traffic, including HGV movements, off-site highways works will be required between the site and the junction of Church Road and The Street to facilitate the safe passing of vehicles in both directions.

The site is limited to a maximum of 25 dwellings, reflecting the balance between making effective use of the available land and the need to address the cost of redeveloping a former brownfield site, against the relatively remote nature of the site and the more limited ability to walk or cycle to local services and facilities.

The site is currently detrimental to the local landscape and a well-designed scheme offers the opportunity to deliver a development which is appropriate within the local landscape type, enhancing views from Church Road and the nearby bridleway Bergh Apton BR15. Much of the planting on the site in non-native, however the established trees on the eastern boundary should be retained and landscaping to the south and west will help visually contain the site within a wider rural landscape.

Although the site is 1.65ha, the allocation is for approximately 25 dwellings, reflecting the relatively remote and rural nature of the site which would not be appropriate for a higher density development

Policy VC BAP1: Former Concrete Batching Plant, south of Church Road

1.65ha of land is allocated for up to 25 dwellings.

The developer of the site will be required to ensure:

- **Access from Church Road, with a preference for non-adopted private drives (for up to 9 dwellings) and less formal highways solutions for the adoptable elements;**
- **Improvements to Church Road between the site and the junction with The Street, to facilitate the safe passing of vehicles in both directions;**
- **A detailed Land Contamination Report (Phase One and Phase Two) to be submitted as part of any planning application;**
- **Protection and retention of the established trees on the eastern boundary and implementation of landscaping to the south and west to help visually contain the site within a wider rural landscape;**
- **Development that preserves and enhances the significance of the nearby listed buildings (including any contribution made to that significance by setting).**

3. Aslacton, Great Moulton and Tibenham

Form and character

Aslacton and Great Moulton

The main concentrations of development within the parishes of Aslacton and Great Moulton are in three distinct settlements – the historic village cores of Aslacton and Great Moulton, and an area of largely modern development at Sneath Common.

The historic core of Aslacton is concentrated around The Street and Church Road and includes the village school.

Great Moulton is a compact settlement which has developed between a number of traditional farmsteads strung along the south side of High Green and some further farms on the north side of Old Road. The village has seen a considerable amount of modern development, with estate development such as Potters Crescent and Heather Way as well as a large amount of infill development.

The local road network comprises of mainly rural roadswith the B1134 to the south of Sneath Common providing links to the A140 to the east and the B1077 and New Buckenham to the west.

Tibenham

The parish of Tibenham has a dispersed rural settlement pattern consisting of individual dwellings and farms scattered throughout the parish. The established village of Tibenham is concentrated along The Street and around the site of the old school. Further detached clusters of development exist at Pristow Green and Long Row. The main concentration of development has developed in a linear form characterised by one plot depth. Its setting in a small valley with abundant tree hedge planting along the road frontages and attractive open countryside give it a rural character.

Services and Community Facilities

Aslacton primary school lies on the main Church Road through the village. Great Moulton has a pub on Frith Way, which also has the village hall at its junction with Carr Lane. Tibenham also has a pub on The Street. There are also several specialty shops across the cluster's settlements. Aslacton and Great Moulton have a limited bus service to Norwich and Diss.

Settlement Limit

Aslacton & Great Moulton

The Settlement Limit has been drawn to include the main built form of the three settlements. In addition, the boundary includes a small allocation on High Green made within the 2015 Site Allocations Plan, as well as the former scrapyard in Aslacton. New dwellings on Pottergate Street and at Sneath Road/Woodrow have also been incorporated into the Settlement Limit.

Site allocations

VC ASL1

The site lies to the east of the village of Aslacton, north Church Road and west of Muir Lane. To the west of the site is the recently developments at Pottergate Street and Cooper Scrap Yard lie to the west and south of the site respectively. Aslacton Primary School and St Michaels Church lie a short distance to the west of the site along Church Road. There is also a bus stop on Muir Lane along the eastern boundary of the site which provides a limited services between Norwich and Diss. Coronation village hall and the Fox and Hounds Public House lies to the south-east of the site along Carr Lane and Firth Way. A wider range of services is provided by the main town of Long Stratton that lies around 3.6km to the north-east of the site.

Given its position adjacent to and opposite existing built development and bounded by Muir Lane to the east, the site relates well to the existing built-form of the village. The site is however flat and affords long and relatively uninterrupted views towards the Forncetts and Wacton from both Church Road and from the Public Right of Way (Aslacton FP6) that runs along the western boundary of the site. Whilst the development of the site would interrupt these existing views, it is not considered to have a significant detrimental impact on the landscape as it will be viewed in the context of the existing built form

To ensure the development responds appropriately to its context, the density and scale of development will need to reflect its village edge location. The trees and hedges along Muir Lane should be retained and the existing hedgerow along the west boundary protected. Appropriate landscaping, such as a native hedgerow, will be required along the northern boundary of the development to create a level of containment and soften the edges of the development. Provision of open green space, in the form of a village green, along the southern boundary of the site will be important to maintain an open approach to the setting of the existing village.

In order to form a safe and suitable access, access to the site will need to be from Church Lane. Provision will need to be made for carriageway widening and the inclusion of a frontage footway that links to the bus stops on Muir Lane. The development of the larger site proposed offers the opportunity to provide an open green space along the frontage of the site, in the form of a village green, increasing the range of amenities available in this part of the village. This should include car parking for the primary school and local church to address local highway issues.

Local concerns were raised regarding drainage issues within the locality. Anglian Water confirmed that improvements to the local pumping station were timetabled for late 2022. Moreover, issues derive primarily from surface water ingress into the foul water system, as such as development with a suitable Sustainable Drainage Strategy (SuDS) should not create any further issues.

The allocation of a site of 2.3ha for approximately 35 dwellings allows for development of an appropriate scale and density to reflect its village edge location, the provision of a frontage village green and land for a school car parking facility.

Policy VC ASL1 – Land off Church Road

2.3 hectares is allocated for approximately 35 homes

The developer of the site will be required to ensure:

- **Vehicular access from Church Lane, carriageway widening along the Church Lane boundary of the site and provision of a frontage footway that links between the existing footway on Church Lane and the bus stop on Muir Lane;**
- **Retention of hedgerows and trees along the western and Muir Lane boundaries of the site;**
- **Provision of appropriate landscaping along the northern boundary of the site to contain and soften the edge of the development within the landscape;**
- **The delivery of a significant area of open space, in the form of a village green, along the Church Lane frontage of the site, including provision of land for school car parking;**
- **A satisfactory foul water drainage strategy for the development prior to the commencement of development.**

VC GRE1

The site lies north of the 2015 South Norfolk Local Plan allocation, which itself fronts High Green, and is west of Heather Way. As such, the site will be contained on two sides by new residential development. To the west there is established vegetation on the boundary with Greendale, which will need to be retained, protected and enhanced. The northern boundary is open to the remainder of the agricultural field and will require a suitable treatment to minimise visual impact and integrate the site with the wider rural landscape, taking into account any views from footpath Great Moulton FP10, between Green Lane and Hallowing Lane.

The layout of the development fronting High Green retains an access to this site between plots 4 and 5, which will be the vehicular access to the allocation, with foot and cycle links also included to Heather Way. Access into VC GRE1 will be via High Green only.

The site is 0.75ha and allocated for at least 12 dwellings, reflecting the scale and density of the adjoining development fronting High Green and the need to deliver an appropriate level of affordable housing.

Policy VC GRE1 – North of High Green, west of Heather Way

0.75ha of land is allocated for at least 12 dwellings.

The developer of the site will be required to ensure:

- **Vehicular access from High Green only and foot/cycle access from both High Green and Heather Way;**
- **Protection and enhancement of the existing hedge and trees on the western boundary and an appropriate landscaped boundary treatment to the north, to minimise visual impact and integrate the site successfully with the wider rural landscape.**

Carried forward allocations

VC GRE2

Previously called GRE1, this allocation from the 2015 Local Plan is carried forward within this document to ensure that development on the site continues to be achievable in an appropriate manner. Both the site boundaries and the scale of development allocated on the site have been updated to reflect changes to the site approved by planning consent 2020/0130. This planning permission granted

consent for 14 dwellings, including 7 affordable housing units accessed off Heather Way on an area that extended outside of the GRE1 allocation. This aspect of the scheme was considered by the LPA to be acceptable as a Rural Exception Site. Accordingly, the GRE1 site allocation has been updated to reflect both the boundaries of the consented scheme and the uplift in the site numbers that is achievable on the larger site, whilst also retaining the delivery of the additional affordable housing units. The site comprises part of a field immediately to the west of the extent of development in Great Moulton along the northern side of High Green, as well as an area of land west of Heather Way.

Policy VC GRE2: Land north of High Green opposite White House Bungalow

1.16 hectares of land is allocated for approximately 14 dwellings. This site is expected to be built out in accordance with the existing planning permission (2020/0130). Any new planning permission will need to ensure the following:

- **Development to include a minimum of 50% affordable housing to reflect the Rural Exception Site element of permitted scheme 2020/0130;**
- **Frontage development onto High Green with the remainder of the development to be accessed via Heather Way;**
- **Site layout to enable both vehicular and pedestrian access through the site from High Green to facilitate future residential development on VC GRE1 to the north of the site;**
- **Opportunities to provide for the connectivity of the High Green element of the site with the Heather Way section of the site to be incorporated into the site design including pedestrian access between the sites, drainage strategy, layout and landscaping unless otherwise agreed with the LPA;**
- **Appropriate boundary treatments to the north of the Heather Way element of the site to reflect the rural context of the site and the edge of settlement location.**

4. Barford, Marlingford, Colton and Wramplingham

Form and character

Barford

Barford is a compact settlement on the north bank of the River Tiffey. Development has extended northwards away from the B1108 along Cock Street and Style Loke, with frontage development to the north of Church Lane and along Chapel Street/Marlingford Road. The historic centre of the village is concentrated on Cock Street and Chapel Street with later estate development situated off Chapel Street at Park Avenue and Clarke Close. The village is set in the attractive valley of the River Tiffey and is characterised by mature tree planting. The most sensitive area of the village is situated on either side of Cock Street where the Hall and its grounds on the west side and the popular plantation on the east side, positively contribute to the form and character of the village.

Barford has a good road link via the B1108 to Norwich 13km to the east and links via mainly unclassified roads to Wymondham 6km to the south.

Marlingford

The main village is located in the bottom of the Yare Valley on the outside of a bend in the river.

Marlingford village has developed along two sides of a triangle formed by Barford Road and Mill Road, which radiate towards the south-west from the junction with Marlingford Road. The junction forms the focal point of the village. To the north-east of the junction is the ‘Old Hall’ which is listed. The area around Old Hall has remained undeveloped which contributes to its setting.

The wedge of land between Barford Road and Mill Road occupied previously by allotments and The Common has remained undeveloped and is locally regarded as Marlingford’s amenity area used for conservation and recreation. This contributes to the rural character of Marlingford as a village set in open countryside within the river valley.

Colton

Historically, the settlement of Colton developed with a number of large farms and small cottages which have been joined up by frontage development to form a distinct

settlement grouping. To the south of Norwich Road the buildings are set in large grounds with trees and hedges along the road frontage. The area to the north of Norwich Road falls within the administrative area of the Broadland District Council. Development along The Street is of higher density.

Wramplingham

Located on the south bank of the River Tiffey, Wramplingham is characterized by its natural character and cluster of historic buildings around the large central pond. Development within the parish has been concentrated along Wymondham Road and The Street with the remainder of the parish displaying a dispersed settlement pattern comprising individual dwellings and farmsteads. The small scale development at Wymondham Road is linear in form and concentrated on the south side of the road.

Services and Community Facilities

Barford has a range of facilities including a village hall and the primary school. There are several industrial and commercial units located within the centre of the village, which provide local employment opportunities. There are also regular bus services to Norwich and Wymondham. Marlingford has a village hall, pub and daily bus service to Wymondham. Colton also has a pub and significant local employment opportunities, and there are several specialty shops across the cluster's settlements.

Settlement Limit

Barford

A Settlement Limit has been drawn to include the main built form of the settlement. A smaller Settlement Limit has been drawn around the existing properties on Church Lane to the west of the village, which includes the allocation south of Church Lane made within the 2015 Site Allocations Plan.

Much of the central part of Barford forms part of the Barford Flood Alleviation Scheme which helps to control flooding in the village. This has therefore constrained where development could be located in the village, and this area has been excluded from the Settlement Limit.

Marlingford

The Settlement Limit has been drawn to include the main built form of the settlement. Due to its rural character and very limited services the Settlement Limit has been drawn to allow only very limited infill development.

Colton

Due to the very limited facilities available in Colton the Settlement Limit has been drawn around the built form on Norwich Road, to allow for very limited infill development and to avoid further expansion into the surrounding countryside, preserving the rural character of the area.

Site allocations

VC BAR1

The site is located north of the B1108 between Cock Street to the east and Back Lane to the west. The eastern section of the site is a brownfield site that lies within the existing development boundary whilst the western section of the site extends into the open countryside. The existing commercial garage and the dwelling in the north area of the site will be demolished as part of the redevelopment of the site. The site is well connected by pedestrian access to the existing facilities in the village, including the village school on Chapel Street, and a regular bus service that runs between Norwich and Watton.

In both landscape and townscape terms the site can currently be considered in two distinct parts, separated by a mature tree belt running north-south through its centre. The west part of the site falls within the designated River Valley. The brownfield element to the east is in a prominent location at the junction of Cock Street and the B1108. The redevelopment of this site provides an opportunity to enhance the local townscape. The land at the west side of the site currently marks the transition between the village and the adjoining countryside, a change that is further enhanced by the rural appearance of Back Lane. The existing mature vegetation to the south and west of the site provides effective screening and enclosure of the site and will need to be retained and enhanced to minimise the visual impact of the development. The existing central tree belt should be incorporated into the site layout as far as possible to enhance the appearance of the site, although some tree loss will be necessary to enable access through the site. An arboriculture survey will be required to assess the condition of these trees.

Technical discussions with the Highways Authority have identified a number of on- and off-site highway works that will be necessary to ensure ongoing highway safety, including a single point of access into the site from Cock Street only. The existing garage access onto the B1108 will be closed. Other works that have been identified include improvements to the Cock Street/B1108 junction at the south-east corner of

the site, a frontage footway along Cock Street and the provision of a pedestrian footway through the site connecting Cock Street to Back Lane to the west.

The Cock Inn lies directly opposite the site, south of the B1108. The supporting Heritage Impact Assessment (HIA) has identified that the redevelopment of the garage site offers an opportunity to enhance the setting of this non-designated heritage asset. Sayers Farm, a listed building, lies to the south-west of the site. Retention of the existing hedgerow along the south and west boundaries will mitigate the impact of new development in this location. The HIA also notes that the B1108 creates a separation between the listed building and its setting and the site, further reducing the impact of development in this location.

Wider surface water flowpaths within the settlement have been identified however discussions with the Lead Local Flood Authority have confirmed that they do not affect the development of this site which lies north-west of these areas. However the Stage 2 identifies a high susceptibility to groundwater flooding, which combined with the nearby flowpaths, will require further investigation.

Whilst Anglian Water have measures in place to deal with river water ingress into the local sewer system, early discussions are recommended to identify preferred connection solutions.

An area of 0.76ha of land is allocated for approximately 20 dwellings which is considered to be a reasonable area to allow for the constraints and infrastructure requirements noted above to be incorporated into the site layout and design, whilst also reflecting the context of the site.

Policy VC BAR1 – Land at Cock Street and Watton Road

0.76ha of land is allocated for approximately 20 dwellings.

The developer of the site will be required to ensure:

- **Vehicular access into the site to be from Cock Street only, with the existing site access onto the B1108 to be closed;**
- **On and off-site highway works to include improvements to the Cock Street/ B1108 junction, a frontage footpath along Cock Street and a pedestrian link through the site to create a linkage between Cock Street and Back Lane;**

- **Submission of an arboricultural survey to determine the condition of the central tree belt and to inform a site layout and design that incorporates these trees as far as possible, as well as the protection of these trees during the construction phase of development;**
- **Retention, protection and enhancement of the existing vegetation and mature trees along the south and west boundaries of the site in order to minimise the visual impact of the site and protect the setting of Sayer's Farm;**
- **Site layout and design to have regard to the nearby heritage assets with particular consideration to be given to the setting of The Cock Inn;**
- **A Phase 1 and Phase 2 contamination survey be undertaken to determine the presence of any on-site contamination resulting from the former garage use of the site and to identify appropriate remediation works.**
- **A site-specific Flood Risk Assessment addressing the high susceptibility to groundwater flooding and the nearby surface water flows.**

5. Barnham Broom, Kimberley, Carleton Forehoe, Runhall and Brandon Parva

Form and character

Barnham Broom

The built-up area around Mill Road is set on a west-facing slope of part of the attractive Yare Valley. It is separated from the eastern part of the village by the significant wooded area south of St Michael's Church and open fields south of Norwich Road. The settlement form here is based on the junction of Mill Road and Bell Road, and estate-scale development has occurred between the two roads. To the east, the built-up area of Norwich Road is linear, with small cul-de-sacs at Chapel Close and Lincoln's Field.

Further east of the built-up area at Norwich Road is the detached farm hamlet of Pockthorpe, which is separated from the main part of the village by a significant open gap, with good views of the surrounding open countryside. Good road links exist to Norwich and Watton (B1108) and Wymondham and Dereham (B1135).

Kimberley & Carleton Forehoe

The settlement of Kimberley is located mid-way between Wymondham and Hingham. It is a scattered settlement which has developed adjacent to Kimberley Park although two main groups of development can be identified at Kimberley Street and Kimberley Green. Kimberley Street is an essentially linear development astride the B1108 whilst the development at Kimberley Green is loosely grouped around the green and the parish church. The parish also includes the settlement of Carleton Forehoe to the north. The parish is centred on the junction of the B1108 and B1135 which provides direct links to Norwich, Watton, Wymondham and East Dereham.

Brandon Parva, Coston, Runhall & Welborne

The parish is located in the north-west of the district. It has no single consolidation of development with the population located in four groups dispersed within an agricultural area. These are located at Runhall, Welborne Common, Brandon Parva and Coston. In addition there are isolated dwellings and farmsteads situated in the parish.

Services and Community Facilities

Barnham Broom has a good range of facilities including a primary school, village hall, shop and post office. Outside the village centre, the parish also contains

Barnham Broom Golf & Country Club. There is a limited bus service to Norwich and Wymondham.

Settlement Limit

The Settlement Limit has been drawn in two parts to include the main built form of the settlement. There is a break in the Settlement Limit where agricultural land and woodland provide a rural setting for the village. As part of the preparation of this Plan two additional areas of land on Norwich Road have been incorporated into the Settlement Limit. The Settlement Limit maintains physical separation between the two built up areas.

Site allocations

VC BB1

The site lies to the south-east of the crossroads formed by Norwich Road, Bell Road, Mill Road and Honingham Road. The site is well located for access to the services and facilities in the village, with the village shop and pub immediately adjacent and the primary school and village hall a short walking distance away, all of which are accessible via pedestrian footpath. A limited bus service also departs from outside of the site to Norwich and Wymondham.

Currently the junction adjacent to the site has poor alignment, particularly in term of visibility for vehicles existing Bell Road, which have restricted visibility to the left/west, into Mill Road. Visibility is limited by the Village Store building, and there is unrestricted parking around the junction used by customers of the store and the nearby Bell Inn, as well as bus stops close by on Bell Road and Norwich Road. Currently there is no opportunity to improve the junction sufficiently within the existing highway to support additional development in the vicinity. As such, the development of this site will require the realignment of Bell Road through the site, to stagger the junction. This will also give the opportunity to create a focal public open space adjacent to the Village Store and improved parking arrangements. The site itself will accessed from Bell Road, potentially from the element which has been realigned. Development of the site will also require the relocation of the existing bus stops, with replacement facilities to be provided.

Currently the site is visually well contained by mature trees and hedgerows on the road boundaries. Development of this site will inevitably lead to the loss of some of this vegetation, however arboriculture surveys will be required to ensure that any loss is minimised. Retaining and reinforcing planting to the east will help protect the

setting of the adjoining farm buildings, which are a non-designated heritage asset, and on the southern boundary to contain the site within the wider landscape. The small group of trees towards the southern end of the site form a mature feature which should be assessed as part of an arboriculture survey of the site. Particular consideration will also need to be given to the form and layout of the open space on the northwest corner of the site, adjacent to the Village Store, balancing the need to create a sense of place in this prominent location, with the retention, where possible, of existing mature trees and hedgerows.

Pockets of surface water flood risk exist on both the eastern and western boundaries of the site and the design and layout of development will need to address this. The Stage 2 Village Clusters Strategic Flood Risk Assessment (SFRA) identifies several issues to be considered through a site-specific FRA, including any displacement of water due to flood mitigation measures, surface water storage and discharge rates and preparation of a Flood Warning and Evacuation Plan.

Early discussions with Anglian Water. are recommended regarding the capacity of the local Water Recycling Centre (WRC) to accommodate the cumulative development in the catchment, which may require the phasing of this site until the capacity is available.

An area of 1.40ha is allocated for approximately 40 dwellings, a scale of development that is considered to be reasonable to enable the alterations that are required to the existing road alignment as well as the provision of an area of open space within the boundaries of the site.

Policy VC BB1 – Corner of Norwich Road and Bell Road

1.40ha of land is allocated for approximately 40 dwellings.

The developer of the site will be required to ensure:

- **Realignment of Bell Road to create a suitable staggered junction with Norwich Road, Honingham Road and Mill Road, to be agreed with the Highway Authority;**
- **Creation of a new area of focal open space in the north-west corner of the site, on the area of land between the realigned Bell Road and the existing road alignment; Relocation of the existing bus stops with suitable facilities;**

- **Arboricultural assessment of the existing trees and hedgerows around and within the site, with the aim of retaining these as far as possible within the requirements of a realigned Bell Road;**
- **Retention and reinforcement of the landscaping on the eastern boundary of the site, to retain the rural setting of the adjacent non-designated heritage assets, and on the southern boundary, to contain the site in longer views;**
- **A site-specific Flood Risk Assessment (FRA) and strategy, to inform the layout of the site, taking account of the issues identified in the Stage 2 VC Strategic Flood Risk Assessment;**
- **Early engagement with Anglian Water regarding the capacity of the receiving water recycling centre and the need to phase the site until capacity is available.**

6. Bawburgh

Form and character

Bawburgh is situated in the bottom of the Yare Valley between the B1108 and A47. Two distinct settlement groups have developed each side of the river. To the south of the river, frontage development extends along Church Street towards the church; more recent estate development is situated on Hockering Lane, with a detached group of dwellings further south beyond the village hall on Stocks Hill. To the north of the river, frontage development follows the line of New Road and Harts Lane, with another nucleus of dwellings to the west of the junction with Marlingford Road.

The central area of the village was designated a Conservation Area in 1973. The floodplain of the River Yare between the two 'sides' of the village has remained undeveloped. This contributes to the valley setting of Bawburgh.

Services and Community Facilities

Bawburgh has a range of facilities including the primary school, village hall and public house. There is a daily bus service to Wymondham.

Settlement Limit

The Settlement Limit is separated by the river which runs through the centre of the village. The northern section includes almost all dwellings on New Road and Harts Lane, including the small cluster of development at the junction with Marlingford Road. The southern section includes most buildings on Church Street and Hockering Lane, but excludes the church itself. The Settlement Limit has been extended to the south along Stocks Hill, incorporating both recent development to the west at Saint Walstan Meadow and established development to the east. There is also a small addition to the Settlement Limit adjacent to the northern boundary of the VC BAW1 allocation.

Site allocations

VC BAW1

The site is located east of Stocks Hill, adjacent to the southern boundary of the Bawburgh Conservation Area. Immediately to the west of Stocks Hill is the new village hall and recreational ground, as well as some limited new residential

development. The centre of the village lies to the north, and further to the east, separated by agricultural land and vegetation is the Norwich Southern Bypass (A47). The site lies within the Norwich Southern Bypass Land Protection Zone. An existing pedestrian footpath provides a connection to the village school which is located on Hockering Lane, within 400 metres of the site.

The site is within a sensitive landscape setting and reflecting this a Landscape Appraisal will be required to inform the design and layout of the site. The site is in an elevated position within the River Valley and offers clear views to the east although existing vegetation screens views of the A47 from the site and restricts views towards Norwich. Whilst development of the site will have a strong relationship with the existing form of the settlement, particularly the modern developments in closest proximity to the site, appropriate landscaping will be required on site to address the visual impact arising in long views towards it from within the wider landscape.

Bawburgh Conservation Area encompasses the central area within the village and extends as far south as the site boundary. Existing vegetation along the road frontage to the north of the site should be retained, as should the existing vegetation along the north boundary, as this contributes positively to the character of the area. The site layout and design, including landscaping and the choice of materials, should reflect the proximity of the site to the Conservation Area. In addition, archaeological finds north of the site mean investigation of the site may be required at the planning application stage, the details of which are to be agreed with the Historic Environment Record.

In highway safety terms development of the site is considered to be acceptable due to the proximity of the site to the local services and facilities, the width of the existing road carriageway at Stocks Hill and the existing pedestrian connectivity available from the site.

A significant surface water flowpath has been identified to the south of the site, draining into the River Yare to the east. The Lead Local Flood Authority has not raised a concern about development in this location however the drainage strategy for the site should take into consideration the presence of this flowpath.

The site is within the catchment of Whitlingham Water Recycling Centre (WRC) and the in-combination effects with development identified in the GNLP may require phasing of this site beyond the early years of the Plan. Initial discussions with Anglian Water have also indicated that there may be sewers crossing the site and

therefore early engagement between Anglian Water and the developer is also advised.

An area of 1.4ha of land is allocated for up to 35 dwellings. This is considered to be a reasonable site area to enable a scheme of an appropriate design and density to come forward in this location, reflecting the local sensitivities and constraints noted above.

Policy VC BAW1: Land east of Stocks Hill

An area of 1.4ha of land is allocated for up to 35 dwellings.

The developer of the site will ensure that:

- **The design, layout and landscaping of the site is informed by a landscape appraisal that seeks to minimise the visual impact of the development within the wider landscape, including in long views from the A47. The landscape appraisal shall be submitted as part of the planning application for the site;**
- **The design of buildings, including the use of materials, is to make a positive contribution to Bawburgh Conservation Area having regard to the Bawburgh Conservation Area Character Appraisal and Management Guidelines;**
- **The Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development;**
- **Retention and protection of the existing road frontage vegetation along Stocks Hill to the north of the site, as well along the north and south boundaries, in order to maintain the character of the area and protect the amenities of existing and future residents;**
- **The drainage strategy for the site to have regard to the off-site surface water flowpath located to the south of the site, details to be agreed with the Lead Local Flood Authority;**
- **Early engagement with Anglian Water regarding the need to phase development within the catchment of Whitlingham Water Recycling Centre.**

7. Bressingham

Form and character

The parish contains a number of scattered settlements of which the largest are the part of Bressingham located on High Road and Bressingham Common located along Common Road. Both settlements are mainly linear in form and are separated and surrounded by large open fields. Both settlements are distinguished by many trees and hedgerows contributing greatly to their rural character and are afforded views across the Waveney Valley by the downward sloping land to the south.

Services and Community Facilities

Bressingham's primary school, village hall and recreation fields are all located around the High Road. Out of the village, Bressingham garden centre provides for some employment opportunities locally and there is a public house on the A1066. There are several infrequent bus services to Diss, Long Stratton and Bury St Edmunds.

Settlement Limit

The Settlement Limit has been drawn to include the two main built forms within Bressingham off Common Road and the Street, and to provide some limited infill within it without affecting the setting of 'The Grange' on High Road or the form and character of the settlement. The remainder of Bressingham is very dispersed and therefore unsuitable for the creation of a Settlement Limit without leading to significant development which would fundamentally alter the character of the area.

Site allocations

VC BRE1

The site lies east of School Road and south of High Road, opposite Bressingham Primary School. This site relates well to the central area of development in Bressingham and the services within it. Furthermore, the site also relates well to the existing development along School Road and is viewed within the context of this built form.

The site is well contained by the existing boundary hedgerows and trees. Frontage development of the site will result in the loss of the existing hedgerows and trees along School Road. However, the hedgerows along the southern and western

boundaries, which are identified as Priority Habitats, will need to be protected and enhanced through the development of the site. Enhancement of the existing landscaped boundary along the northern boundary of the site is also important in order to protect the amenities of existing and future residents.

The frontage of the site along School Road is located immediately to the north of Pine Tree Cottage, a Grade II listed building. To preserve views of Pine Tree Cottage from the north an area of open space is required in the south-west corner of the site, as identified in the supporting Heritage Impact Assessment (HIA).

For highways safety reasons on- and off-site highways works will be required. These include: frontage development facing onto School Road, localised carriageway widening along the site frontage and the provision of a frontage footway to connect with the existing pedestrian footpath at High Road. Local concerns have also been raised about parking issues associated with pick up and drop off at the adjacent school. Options to improve car-parking provision in close proximity to the school are limited. Therefore, to ensure the satisfactory functioning of the highway network, applicants will be required to undertake an assessment to determine the requirement for and deliverability of a school car park within the site in conjunction with Norfolk County Council, Bressingham Primary School and South Norfolk Council (in its role as Local Planning Authority) at the time of the planning application. Should this assessment demonstrate a deliverable need, land should be reserved within the site to facilitate this, and a proportionate contribution made to delivery.

Whilst recognising that existing surface water flows are contained to the highway and adjacent ditches, the Stage 2 VC Strategic Flood Risk Assessment (SFRA) identifies that future development and climate change could impact on existing flows. The drainage strategy for the site will need to demonstrate that there will be no increase in surface water flood risk as a consequence of the development of the site.

The allocation of a site of 2.06ha for up to 40 dwellings is considered to be appropriate and reflects the need to provide open space to maintain the setting of Pine Tree Cottage and provide an opportunity to include an overflow carpark for the school.

Policy VC BRE1: Land east of School Road

2.06ha of land is allocated for up to 40 dwellings.

The developer of the site will be required to ensure:

- **Frontage development onto School Road, with localised carriageway widening of School Road and the provision of a pedestrian footway along the site frontage to connect with the existing pedestrian footpath at High Road;**
- **To determine the requirement for and deliverability of a school car park within the site, to be agreed in conjunction with the Norfolk County Council (in its role as Highway Authority and Education Authority), the school and the Local Planning Authority, and include land within the development, and contribute proportionately, to deliver the scheme if a deliverable need is demonstrated;**
- **Protection and enhancement of existing hedgerows along the south and east boundaries of the site to integrate the site into its surroundings and the enhancement of the existing boundary to the north of the site to minimise the impact on the residential amenities of existing and future residents;**
- **Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development;**
- **A site design and layout to protect and enhance the setting of Pine Tree Cottage through the inclusion of an area of open space in the south-west corner of the site, as well as appropriate landscaping.**

8. Brooke, Kirstead and Howe

Form and character

Brooke

The village is situated on the B1332 Norwich – Bungay Road with development traditionally located in a linear form running eastwards and westwards from the Norwich Road (B1332) along The Street and High Green. Some modern estate development has occurred off both these roads.

The village is characterised by a mixture of dwellings, especially on The Street and High Green where there are many historic buildings. These combine with trees, hedges, water features and undeveloped spaces to create an attractive area which is encompassed by Brooke Conservation Area. There is a small but important area of open space at the southern end of Brecon Road. The area immediately to the south of the village is well wooded which creates a visual shield for the village. Elsewhere within the parish development is widely dispersed comprising individual dwellings and farmsteads, although Brooke Industrial Park has been developed in recent years to the north of the village on the B1332. This road provides relatively good access to Norwich some 12km to the north and Bungay to the south.

Kirstead

Kirstead is a sparsely populated parish. It comprises individual dwellings and farms dispersed throughout, together with a concentration of linear development at Kirstead Green and Green Man Lane, set in attractive open countryside.

Howe

Howe is a sparsely populated parish. The development in the parish displays a scattered form and has been concentrated along Howe Green with a small number of individual farmhouses dispersed throughout the remainder of the parish.

Services and Community Facilities

Brooke has a range of social, community and recreational facilities including a pub, cafés, farm shop, village hall and the primary school. Employment opportunities are available at the industrial park, and there is a regular bus service to Norwich and Bungay.

Settlement Limit

The Settlement Limit for Brooke is in three parts. Within the main settlement itself, the boundary is divided into a western section around development along High Green and Norwich Road and an eastern section encompassing development along The Street. Parts of the centre of the village around the Meres and the Conservation Area around Brooke House have been specifically excluded. The third section of Settlement Limit is to the north of the main settlement and defines the Brooke Industrial Park employment area. A minor amendment to the Settlement Limit has been made at High Green (north of The Mallows Walk) as part of the review of the existing Settlement Limit boundaries.

Site allocations

VC BRO1

The site lies to the north of Brooke, on two parcels of land, either side of the B1332, Norwich Road. The site is well located for access to the services and facilities in Brooke, and for public transport on the main Norwich/Bungay bus route, for access to the full range of services/facilities.

Land to the west of Norwich Road is contained between the heavily vegetated grounds of Brooke Lodge to the north and part of the completed housing allocation from the 2015 Local Plan to the south. To the rear (west) the site is open to the remainder of the existing agricultural field. Land to the east of Norwich Road lies to the north of the remainder 2015 Local Plan allocation, but is largely open to the road frontage and wider countryside on the other boundaries. As such the western part of the site is visually well contained on the Norwich Road frontage by the vegetation in the grounds of Brooke Lodge. However, there is no existing screening to the rear (west) of the site and this aspect will be visible from nearby footpaths Brooke FP2/Howe FP6 and Brooke FP4/Howe FP5. To the east the site is much more open in the landscape, with no existing screening to either the north or east and will be clearly visible from Entrance Lane and nearby footpath Brooke FP3. As such, careful consideration will need to be given to the open aspects of these sites, to ensure that there is a successful containment and integration with the wider countryside. Mature trees on the furthest west site boundary and in the grounds of Brooke Lodge will require protection.

Whilst the site extends the village northwards, rather than along the east/west access axis that has been the more traditional direction for growth, the development

will be contained on the west by Brooke Lodge and to the east by landscape reinforcement of the existing field boundary. The listed Brooke Lodge, to the north, is screened from potential development by the level of vegetation in the grounds. Brooke Conservation Area lies to the south; however, the Heritage Impact Assessment (HIA) concludes that distance and intervening development mean the site is already visually disconnected and therefore will not have an impact on this designated heritage asset. Frontage development is the preference to Norwich Road, which continues the form and character of the locality.

As the site sits either site of Norwich Road, access arrangements will need to ensure there is both safe access to the sites themselves, and that a safe flow of traffic is maintained on B1332. As such the preferred highways solution is a roundabout that links the two sites; a crossroads would not be acceptable, and a staggered junction may not be achievable within the available site frontages. The current layby is within the highway to accommodate junction arrangements. A roundabout would also have the effect of calming speeds into the village, which is currently the transition from the national speed limit to the 30mph limit. Any alternative solution would need to be agreed with the Highway Authority at the time of any planning application.

Footways will be required across the site frontages on both sides of Norwich Road, connecting to the existing footways that already provide good access to the main facilities in the village. On the western side this would also connect to footpath BrookeFP2/Howe FP6, which runs along the northern boundary of the site; the footpath will need to be appropriately incorporated into the design/layout of the development to ensure that it is safe and convenient to use. In addition, a crossing point will be required on Norwich Road so that there is safe pedestrian route to the primary school from the eastern part of the allocation.

The Stage 2 VC Strategic Flood Risk Assessment (SFRA) indicates that there is a potential for ponding in the Norwich Road frontage of the western part of the site, which will need to be taken in to account as part of the access arrangements and layout of development. A site specific SFRA will be required, to demonstrate that the site is not at an increased risk of flooding in the future, that the development of the site does not increase the risk of surface water flooding on the site and to neighbouring properties and how the natural flood storage provided by the pre-developed site is preserved.

The allocation of a site of 2.2ha for up to 50 dwellings allows for development of an appropriate scale and density to reflect the edge of settlement location and the provision of a roundabout junction on the B1332.

Policy VC BRO1: East and West of the B1332, Norwich Road

2.2ha of land is allocated for up to 50 dwellings.

The developer of the site will be required to ensure:

- **Access to the site is via a roundabout junction on the B1332, unless otherwise agreed with the Highways Authority;**
- **Footways are provided to the Norwich Road frontages, connecting to existing provision and, on the western side, to footpath Brooke FP2;**
- **Inclusion of footpath Brooke FP2 within the layout of the development, to ensure it is safe and convenient to use;**
- **A crossing point on the B1332 which secures a safe pedestrian route between the eastern part of the site and Brooke Primary School;**
- **A site-specific Flood Risk Assessment (FRA) and strategy, to inform the access arrangements and layout of the site, and which has regard to the Stage 2 VC Strategic Flood Risk Assessment (SFRA);**
- **Landscaping to the boundaries with the open countryside which successfully contain the impact of development and integrates the site with the wider countryside;**
- **Protection of the mature trees both on the site boundaries and immediately outside of the site;**
- **Frontage development to Norwich Road, consistent with the form and character of the area.**
- **Historic Environment Record is consulted to determine the need for any archaeological surveys prior to the development**.

9. Bunwell

Form and character

The village is a series of dispersed groups of dwellings. The village at Bunwell Street is set in predominantly flat open countryside. This contrasts with the clusters of development at Low Common and Bunwell Hill, which are set in the Tas Valley. Development has been concentrated at Bunwell Street, in an extensive linear form with small clusters of development at Bunwell Hill and The Turnpike, Bunwell Bottom, Cordwell and Low Common. Development along The Street is interspersed with a number of farms generally set back from the road, providing an open aspect on the street scene. Parts of the built-up area of Bunwell Street lie within the parish of Carleton Rode. For the purposes of a Settlement Limit, these are included within Bunwell. The B1113 runs through the parish, linking it to New Buckenham and Norwich. There are also road links to Attleborough and Wymondham.

Services and Community Facilities

Bunwell Street has a range of facilities, including local employment opportunities. The primary school, village hall and recreation fields are located separately at The Turnpike. There are limited bus services to Norwich, Wymondham, East Harling, Diss and Wreningham.

Settlement Limit

The Settlement Limit has been drawn to include the main built form of the settlement and includes the two small allocations made within the 2015 Local Plan; land north of Bunwell Street and land at The Turnpike. An additional area of development at Smockmill Close, north of Bunwell Street, has also been incorporated into the updated Settlement Limit. The Settlement Limit covers most development in Bunwell Street but is split at Lilac Farm where farm buildings are excluded. There are additional Settlement Limits at Old Turnpike (by the school), The Turnpike and Little Green.

Site allocations

VC BUN1

The site is located to the east of the village, adjacent to the 2015 allocation site (BUN1) which, at the time of preparing this policy, is currently under construction. To the south and west of the site is existing residential development whilst to the north and east is agricultural land. The site forms a gateway into Bunwell on approach from the east. A Public Right of Way (Bunwell FP2) runs parallel to the site, adjacent to the eastern boundary. The site relates well to the village and its existing facilities and services which are fully accessible by pedestrian footpath, including the primary school, village hall and recreation ground.

Bunwell is a predominantly linear settlement with small pockets of development in evidence, including most notably south of Bunwell Street opposite the site. The adjacent development to the west (2019/1542) is relatively low density comprising 9 detached dwellings in a tandem form of development. In this context the depth of the site within the landscape and the visual impact of further development on the streetscene is acceptable. The existing site is level with minimal landscaping, affording clear views across the fields to the north. Whilst development of the site will inevitably have some visual impact, new development in this location will be of modest scale and viewed within the context of the existing settlement. Boundaries that avoid the creation of a harsh settlement edge will be required for the north and east boundaries to improve the assimilation of the site into the adjoining countryside, particularly in public views from the local footpath network. Boundaries that result in a feeling of enclosure along Bunwell FP2 should be avoided. Landscaping of the site will also a significant role in mitigating the visual impact of development and integrating the site into the wider countryside.

The site benefits from a frontage along Bunwell Street from which direct vehicular access can be achieved. Discussions with the Highways Authority have indicated that in highway safety terms the site is acceptable. Highway mitigation measures associated with the delivery of this site include the provision of a footway along the site frontage and consideration being given to an extension of the existing 30mph speed limit adjacent to the site.

The Lead Local Flood Authority (LLFA) have advised that a small area of ponding exists in the north-east corner of the site however this may be addressed through an appropriate layout and drainage strategy at the application stage.

Due to the potential presence of Anglian Water infrastructure across the site, the limited connection potential the current vacuum sewer system and the possible need to phase development connecting to the Forncett Wastewater Recycling Centre, developers are advised to engage with Anglian Water at any early stage in the design process. The site is in an area identified as being within Groundwater Source Protection Zone 3. Site developers will be required to liaise with the Environment Agency to ensure that water quality is not adversely affected however this does not preclude development of the site.

An area of 1.04ha of land is allocated for approximately 15 dwellings. This is considered to be an appropriate area of land to deliver the standard infrastructure on site, incorporate appropriate landscaping to integrate the site into the wider landscape and respond to the density of the adjoining development to the west of the site.

Policy VC BUN1: Land to the north of Bunwell Street

1.04ha of land is allocated for approximately 15 dwellings.

The developer of the site will be required to ensure that:

- **The site layout and design responds to the gateway location of the site, with particular emphasis given to the landscaping of the site and the inclusion of appropriate boundary treatments along the north and east boundaries of the site to integrate the site with the wider countryside;**
- **In the interests of highway safety on and off-site highway works will include a footway along the site frontage and consideration being given, in liaison with the Highways Authority, to the extension of the existing 30mph Traffic Regulation Order (TRO) on Bunwell Street;**
- **Early engagement with Anglian Water (AW) to identify possible infrastructure crossing the site, the capacity to connect to the current vacuum sewer system, as well as the need to determine the capacity of the receiving Water Recycling Centre (WRC), and the consequent potential need to phase the site until capacity is available.**

VC BUN2

The site lies towards the eastern end of the settlement, within an existing small landscape gap between two sections of the linear development which characterises Bunwell. Currently the allocation site forms a gateway to a large parcel of agricultural land that continues to the north and north-east of the site. Adjacent to the west of the site is a small, recently constructed, residential development (Smockmill Close); linear residential development continues to the east whilst opposite the site is a commercial site with large industrial units that are set back from the road frontage providing an open aspect to Bunwell Street. The site has a strong relationship with the village and its existing facilities, all of which are accessible via the existing pedestrian footpath, including the primary school, village hall and recreation ground which lie to the east of the site.

The existing landscape gap provides an element of relief within the streetscene, providing open views across the wider agricultural landscape to the north-east. The flat topography of the site, combined with the distant wooded areas to the north result in long views from Bunwell Street at present. However, the road frontage is limited in width and is constrained by existing residential development to the east and west. As such, the significance of this gap as well as its value within the streetscene is limited by these factors.Long distance views back towards the site from Public Rights of Way Bunwell FP1 and FP2 to the north and east will not be significantly impacted as the new development will be seen in the context of the existing built form of the settlement. Bunwell FP5 emerges onto Bunwell Street directly opposite the site and therefore there will be some visual impact experienced by the users of this footpath. To address this, as well as to protect the residential amenities of the occupiers to the east, the policy requires an area of open space to be incorporated into the site layout within the eastern section of the site. This area of open space will also ensure that some limited views across the wider landscape are retained. If possible, in highway safety terms, the existing frontage hedgerow along this section of the site frontage should be protected and retained.

The site benefits from a road frontage and good connectivity. Discussions with the Highways Authority have indicated that on and off-site highway works will need to include the provision of a pedestrian footpath along the site frontage to connect with the existing footpath as well as localised carriageway widening of Bunwell Street.

There are a number of designated heritage assets buildings within proximity of the site. Currently there are views of The Cottage across the site from Bunwell Street, whilst these will be reduced the retention of agricultural land between The Cottage

and the site will ensure that some of the rural setting of the building will be retained. Development on the site will be required to respond sensitively to the presence of this heritage asset including through sensitive layout and design, the use of appropriate materials and incorporating appropriate landscaping to the north of the site. Whilst Lilac Farm lies opposite the site it is offset and set back within its plot. It is also viewed within the context of the adjacent commercial site and as noted in the supporting Heritage Impact Assessment is not considered to be significantly impacted by VC BUN2

The site is identified as being with Groundwater Protection Zone 3, which would not preclude development, but early liaison with the Environment Agency regarding the protection of water quality.

An area of 1ha of land is allocated for approximately 20 dwellings. This is considered to be an appropriate area of land to deliver the standard infrastructure on site and appropriately address the constraints identified above.

Policy VC BUN2: Land opposite Lilac Farm, Bunwell Street

1ha of land is allocated for approximately 20 dwellings.

The developer of the site will be required to ensure that:

- **Site layout and design includes an area of open space to the east of the site to protect the residential amenities of existing and future occupiers, and to retain some long views across the site to the north and north-east;**
- **Site layout and design to respond appropriately to the designated heritage asset to the north-west of the site (The Cottage) including through the use of appropriate materials, landscaping and boundary treatments;**
- **On and off-site highway works to include the provision of a pedestrian footpath along the site frontage and localised carriageway widening of Bunwell Street.**
- **Early engagement with Anglian Water (AW) regarding the capacity to connect to the current vacuum sewer system, as well as the need to determine the capacity of the receiving Water Recycling Centre (WRC), and the consequent potential need to phase the site until capacity is available.**

10. Burston, Shimpling and Gissing

Diss and District Neighbourhood Plan

The Diss and District Neighbourhood Plan covers an area that includes the following settlements that are, or form part of, a South Norfolk Village Cluster: Burston, Shimpling, Diss, Roydon and Scole.

The Diss and District Neighbourhood Plan is being prepared by a steering group working on behalf of Diss Town Council (as the Qualifying Body) and Burston & Shimpling, Roydon, and Scole Parish Councils. The Neighbourhood Plan area also includes Brome & Oakley, Palgrave and Stuston parishes within Mid-Suffolk District. The Neighbourhood Plan was submitted to South Norfolk Council and Mid-Suffolk District Council in July 2022 and was published for consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 between November and December 2022. Once its independent examination is complete the Neighbourhood Plan is expected to be adopted as part of the Development Plan.

The proposed Diss and District Neighbourhood Plan includes site allocations for residential development, based upon housing requirements for different areas as set out in the Greater Norwich Local Plan (GNLP).

A minimum housing requirement of 25 homes for the Burston, Shimpling and Gissing cluster, 25 homes in the Roydon Cluster and 50 homes in the Scole Cluster is identified in this Plan. This reflects the proposed allocation within the submitted Diss and District Neighbourhood Plan. These will contribute to the GNLP requirement for the South Norfolk Village Clusters.

Details of the proposed Diss and District Neighbourhood Plan can be found on South Norfolk Council's website at: www.southnorfolkandbroadland.gov.uk/ddnp.

Further information is also available at the Diss & District Neighbourhood Plan website, here: www.ddnp.info.

Form and character

Burston & Shimpling

Burston comprises the village and outlying hamlets of Mill Green and Shimpling. A further group of dwellings is located at Audley End.

Burston has developed mainly along Diss Road, Crown Green and Station Road and is centred round two village greens. The western half comprises relatively modern detached dwellings in contrast to the eastern side which is mainly semi-detached ribbon development. Crown green, Church green and the open areas leading into Higdon Close form an attractive centre to Burston. There are several notable old buildings which form part of the designated conservation area extending along Diss Road and Mill Road. The surrounding countryside comprises mainly open fields bordered by low hedges and scattered trees.

Gissing

The parish of Gissing comprises two main settlements at Upper Street and Lower Street, separated by a large, farmed area of former parkland. With the exception of a cluster of buildings at Mill Green, the remainder of the parish is sparsely populated, containing farmsteads and some isolated rows of dwellings.

Services and Community Facilities

The cluster's primary school is centrally located in Burston, which also houses a pub and a recreation field. Another pub is found in Gissing. Both villages have a limited bus service to Norwich and Diss.

Settlement Limit

The Settlement Limit has been drawn to provide for the consolidation of much of the built form of Burston, allowing for limited infill development within it. The Settlement Limit excludes the areas considered to form attractive features of the village which include Crown Green and Church Green and their respective settings. The boundary also excludes the outlying settlements, although should the Mill cease to operate this could provide a suitable brownfield redevelopment opportunity.

11. Carleton Rode

Form and Character

To the north of the parish dwellings are within the Settlement Limit of, and therefore considered within, Bunwell. Elsewhere, the main development of Carleton Rode village is along Flaxlands Road/Rode Lane, resulting in a linear settlement form characterised by one plot depth. There are isolated clusters of development at Hargate on the B1113 and at the junction of the B1113 and Rode Lane.

Development along Rode Lane has been concentrated along the east side of the road, with the exception of a small group of dwellings on the west side. The relatively undeveloped west side of Hall Road and Rode Lane allows views of the surrounding countryside. Development around Church Farm is separated from the main built-up area by large open fields, contributing to the rural setting of the village. The village is surrounded by generally flat countryside, with the Tas Valley in the southern part of the parish. The B1113 runs through the south of the parish, linking it to New Buckenham and Norwich. There is also a road link to Old Buckenham.

Services and Community Facilities

The primary school is located to the south of the village, opposite the church, while the social club and playing field are to the west of the village on Mill Road. Carleton Rode has a limited bus service to Norwich, Diss and East Harling.

Settlement Limit

The Settlement Limit has been drawn to include the main built form of the settlement and include the allocation made within the 2015 Site Allocations Plan. The proposed Settlement Limit covers most development along Rode Lane/Flaxlands Road and separates the main village from the Church Farm cluster where open countryside is prominent.

Carried forward allocations

VC CAR1

Previously called CAR1, this allocation from the 2015 Local Plan is carried forward within this document to ensure that development on the site continues to be achievable in an appropriate manner. The site benefits from planning permission for

3 dwellings (2017/2092) and is also currently subject to an updated application, also for 3 dwellings (2022/0653). The 2022/0653 planning application is pending determination subject to a resolution to the wider ongoing nutrient neutrality matter. This site extends the development boundary to the west of Rode Lane and mirrors the location of the existing houses on the opposite side of the road.

Policy VC CAR1: Land west of Rode Lane

0.3 hectares is allocated for housing and associated infrastructure for approximately 3 dwellings. This site is expected to be built out in accordance with the existing planning permission (2017/2092). Any new planning permission, other than the approval of reserved matters applications in line with the existing outline, will need to ensure the following:

- **Dwellings which are limited to 1 or 1½ storeys to reflect the scale of the dwellings immediately to the north of the site on Rode Lane;**
- **A layout and design that has regard to the setting of Flaxlands Farmhouse to the north-east of the site;**
- **Appropriate boundary treatments to the south and west boundaries of the site to reflect the rural context and edge of settlement location of the site.**

12. Dickleburgh

Dickleburgh Neighbourhood Plan

The Dickleburgh and Rushall Neighbourhood Plan is being prepared by the Dickleburgh and Rushall Neighbourhood Plan Steering Group. The Neighbourhood Plan will include site allocations for residential development, based upon housing requirements for different areas as set out in the Greater Norwich Local Plan (GNLP).

A minimum housing requirement of 25 homes has been identified for the Dickleburgh cluster is identified in this plan.

The emerging Dickleburgh and Rushall Neighbourhood Plan intends to identify a proposed site to deliver this minimum requirement. As of December 2022, the Neighbourhood Plan is yet to progress to the statutory, pre-submission consultation stage, as required by Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. However, extensive preparative works have been undertaken, including preparation of a Strategic Environmental Assessment and a Habitats Regulations Assessment. Once adopted the Neighbourhood Plan will form part of the adopted Development Plan for South Norfolk.

Further details relating to the Dickleburgh and Rushall Neighbourhood Plan can be found at the Parish Council's website, here:
www.dickleburghandrushallpc.org.uk/neigbourhood-plan

Form and character

Dickleburgh and Rushall

The main concentration of development within the parish is based along the former A140. There are also smaller rural communities at Rushall and Langmere. Individual dwellings and farmsteads are dispersed throughout the remainder of the parish.

The historical centre of the village has developed along The Street and is characterised by buildings close to the road. More recent development has extended the built-up area both north and south along the former A140 with further developments eastwards along Rectory Road and Harvey Lane. Immediately to the north of the main part of the village is an area of development at Dickleburgh Moor, a

small detached ribbon of development along the west side of Norwich Road. A number of estate developments have taken place in between Rectory Road and Harvey Lane. The A140 by-passes the village to the west providing links to Norwich to the north and Ipswich to the south, as well as Diss via the A1066.

Services and Community Facilities

Dickleburgh has a range of social, recreational and community facilities including a village hall, recreation field, shop, post office, pub, chip shop and primary school. Rushall also has a pub. Both villages are served by a limited bus service to Diss and Long Stratton. Dickleburgh has a further limited bus service to Norwich.

Settlement Limit

The Settlement Limit has been drawn to include the main built form of the settlement, but specifically excludes the grounds of All Saints Church and the Rectory, the allotment gardens on Chapel Road and the recreation ground on Harvey Lane because of their contribution to the form and character of the village. In addition, no boundary has been drawn around the detached ribbon development at Dickleburgh Moor as further residential development would be detrimental to the rural character of the area. The Settlement Limit extends around the main settlement which includes the allocated land north of Harvey Lane made within the 2015 Site Allocations Plan.

13. Ditchingham, Broome, Hedenham and Thwaite

Form and character

Ditchingham

Development within the parish has been concentrated along Loddon Road, Norwich Road, Station Road and Thwaite Road to form the established village of Ditchingham. Abutting the village to the east is the village of Broome. To the south of the parish at Ditchingham Dam is a small area of development which is contiguous with the built-up area of Bungay lying largely within the Broads Authority area and includes the large development on the former maltings sites. Development within the remainder of the parish comprises of individual dwellings and farmsteads.

The village has developed a nucleated settlement form largely as a result of substantial post-war development. The majority of this growth has taken the form of estate development between Thwaite Road and Loddon Road. An area of 1950s Tayler and Green housing at Windmill Green and Scudamore Place makes a significant contribution to the character of the village and is now a Conservation Area. The A143 runs across the south of the parish linking with Beccles and the A146 to the east and Harleston, the A140 and Diss to the west. The B1332 provides a link to Norwich, whilst local road and pedestrian facilities provide easy access to Bungay.

A large area of the southern part of the parish lies within the Broads Authority area with the main village also close to the Broads.

Broome

Development within the parish has been along Yarmouth Road and Sun Road in a linear form with an isolated group of development at Broome Street. Elsewhere the parish displays a dispersed settlement pattern comprising individual dwellings and farmsteads. The south-western end of the village merges with development at Ditchingham so that there is no clear distinction between the two settlements at this point.

The village is set in attractive open countryside within the Waveney Valley. Broome Heath lies to the north of Yarmouth Road and the undeveloped nature of this side of Yarmouth Road provides an open aspect which contributes significantly towards the rural character of the village. The A143, which by-passes the village, provides a link

to Harleston and Diss to the south-west and Beccles and Great Yarmouth to the north-east, as well as Lowestoft via the A146. Local road and pedestrian links provide easy access to Bungay to the south, whilst the nearby B1332 provides a link to Norwich to the north.

Part of the parish lies within the Broads Authority area.

Hedenham

Hedenham is a sparsely populated parish. It mainly comprises individual dwellings and farms with a small concentration of development on Church Road. The settlement is set in attractive open countryside interspersed with small wooded areas and is partly situated on the south slope of a small valley bounded to the east by Hedenham Park giving a rural character. The settlement is characterised by traditional cottages with some Tayler and Green housing at Smiths Knoll and both Hedenham Hall and Ditchingham Hall with their associated parklands form an attractive area of historic parkland.

Hedenham has had a designated Conservation Area since 1994.

Thwaite

The main concentration of development within the parish has taken place along Bungay Road towards the church. Individual dwellings and farmsteads are sparsely distributed throughout the remainder of the parish. The agricultural nature and the open countryside all emphasis the rural character of the area.

Services and Community Facilities

The cluster has a range of social, recreational and community facilities including a village hall, recreation field, shop, post office, pub, restaurant and primary school. The cluster is also home to several employment uses across different sectors. Hedenham has a limited bus service to Norwich and Bungay. Broome has a semi-regular bus service to Diss, Bungay, Beccles and Yarmouth. Ditchingham is included on all these bus routes.

Settlement Limit

Ditchingham

The Settlement Limit has been drawn to include the main built form of the settlement, and to include the land to the north of Rider Haggard Way previously allocated in the 2015 Local Plan. An additional area of land promoted as part of the Plan process on

land north-west of Lambert's Way has been assessed and incorporated into the updated Settlement Limit.

Broome

The Settlement Limit has been drawn to include the existing linear pattern of development in the settlement and to include the allocation made on the Old Yarmouth Road within the 201 Local Plan.

Hedenham

The Settlement Limit has been drawn around the area of Smiths Knoll to allow for limited sensitive infill only due to the limited facilities available and character of the conservation area.

Site allocations

VC DIT1

The site is located to the north-east of the village, immediately north of the 2015 allocation site DIT1. DIT1 is currently under construction. A Public Right of Way (PROW), Ditchingham FP5, runs north-south, parallel to the east boundary of the site. Ditchingham C of E Primary Academy is located within 100 metres of the site and the site is well connected to the other existing services and facilities within the settlement. Regular bus services connect residents of Ditchingham with Bungay to the south and Norwich to the north.

The site lies within a larger agricultural field and is bound to the east, south and west by residential development. Wider views of the site are limited due to the presence of a substantial tree belt along the northern perimeter of the wider field, as well as existing vegetation to the east along Thwaite Road. Although the site lies within a River Valley setting it has a strong relationship with the existing built form of the settlement and will not have an adverse landscape impact.

Access to the site will be via Hamilton Way to the south with additional pedestrian connectivity provided to Ditchingham FP5. The site layout and design, including infrastructure and connectivity, should maximise opportunities to respond to the adjacent development site (2019/1925). Particular regard should be given to the amenities of both existing and future residents along all of the site boundaries.

Discussions with the Lead Local Flood Authority have identified an area of the site that is at risk of flooding during the 0.1% AEP flood event. In conjunction with the

promoter of the site the site area has been amended to minimise the impact of this constraint. It is noted that the identified surface water flowpath contributes to a wider off-site flowpath and the drainage strategy for the scheme will need to respond to this appropriately. A site-specific Flood Risk Assessment will be required, with consideration given to the key issues identified in the Stage 2 VC SFRA.

Anglian Water (AW) has advised that their infrastructure may cross the site and the developer is encouraged to enter into early engagement with AW regarding this potential constraint. DIT1 is in addition to the 2015 Local Plan allocations in Ditchingham and Broome, and the cumulative impact of recent and planned growth may require phasing of DIT1 to allow for upgrades to Ditchingham Water Recycling Centre.

The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan.

An area of 1.56ha of land is allocated for up to 35 dwellings, a scale of development that is considered to be acceptable within the context of the surrounding built form and sufficient to deliver the required standard infrastructure whilst addressing the constraints addressed above.

Policy VC DIT1: Land at Thwaite's and Tunneys Lane

1.56ha of land is allocated for up to 35 dwellings.

The developer of the site is required to ensure:

- **Vehicular access to the site to be via Hamilton Way with pedestrian connectivity to Ditchingham FP5 to be created;**
- **Site layout and design to respond to the existing built forms adjacent to the site, including in terms of building height and massing, safeguarding of the residential amenities of existing and future residents and maximising opportunities for connectivity;**
- **Early engagement with Anglian Water (AW) to identify possible infrastructure crossing the site and the need to phase the site for possible upgrades to the Ditchingham Water Recycling Centre;**
- **Protection of the mature trees on the site boundaries and outside the site during the construction phase of development**

- **A site-specific FRA demonstrates that the site is not at an increased risk of flooding in the future, that the development of the site does not increase the risk of surface water flooding on the site and to neighbouring properties, and how the natural flood storage provided by the pre-developed site is preserved.**

14. Earsham

Form and character

Earsham is located within the Waveney Valley approximately 1km south-west of Bungay and in close proximity to the Broads. The main area of development in the parish lies to the south of the modern A143 along The Street. Development elsewhere in the parish is of a scattered and sporadic nature.

The main built-up area of Earsham was originally based along the line of The Street with the core of the village centred on the crossroads of The Street and Station Road. Significant post-war development has resulted in a more nucleated settlement form. Earsham has good links, via the A143 with Beccles and Lowestoft to the east, and Harleston and Diss to the west, and to Norwich via the B1332. Part of the parish, to the north of the A143 bypass, lies within the Broads Authority area.

Services and Community Facilities

The settlement has a range of commercial, social and community facilities including a primary school, pub and village hall. Earsham is in close proximity to Bungay which provides a large range of social and community facilities. There is a regular bus service to Bungay, Beccles, Diss and Yarmouth.

Settlement Limit

The Settlement Limit includes the main built form of the settlement and includes the new development at Granary Close, formerly the EAR1 allocation in the 2015 Local Plan.

Site allocations

VC EAR1

The site is located to the east of Earsham and adjacent to Earsham CEVA Primary School which abuts the northern boundary of the site. To the east of the site is the River Waveney, with the site lying within an area identified as the Waveney River Valley. A Public Right of Way (PROW), Earsham FP9, also lies to the east of the site, midway between the site and the River Waveney, and affords views back towards the settlement. The site relates well to the existing services and facilities within the village, including the primary school, village hall and public house.

Supporting evidence in the form of a Heritage Impact Assessment (HIA) and a Landscape Visual Appraisal (LVA) have considered the impact of the site on both heritage assets and the landscape. The impact of development on the significance of the setting of both The Close and All Saints Church has been assessed and is considered to be acceptable. Archaeological finds located in proximity to All Saints Church may extend closer to the site and liaison with the Historical Environment Service will be required as part of the planning application process. Some intermittent long views of the site may be visible within the wider landscape however with appropriate design and landscaping the visual impact of the site can be reasonably mitigated. These design solutions may include lower density development within the eastern section of the site.

Early highways concerns about the site have been addressed by enlarging the site boundaries to include the vicarage and its curtilage. Discussions have focussed on the removal of the existing dwelling and associated outbuildings from the site in order to secure an appropriate vehicular access into the site, and the number of dwellings to be delivered on this site has been adjusted accordingly. To preserve highway safety by improving visibility and to improve the existing pedestrian footpath it is likely to be necessary to remove the existing frontage hedgerow along this part of School Road.

Land further to the east of the site comprises floodplain associated with the River Waveney. However, the boundaries of VC EAR1 do not extend into this area and no concerns have been raised either by the Lead Local Flood Authority (LLFA) or within the supporting Stage 2 Strategic Flood Risk Assessment (SFRA). However, due to the overall site area and in accordance with current requirements, a flood risk assessment (FRA) will be required alongside any planning application for the site. This will inform specific proposals for the site.

A site area of 1.3ha has been allocated for up to 25 dwellings. This is considered to be an appropriate density for this edge of settlement site whilst taking into consideration the identified constraints, including the visual impact of development in this location.

Policy VC EAR1: Land east of School Road

1.3ha of land is allocated for up to 25 dwellings.

The developer of the site will be required to ensure that:

- **Design and layout of the site responds to the landscape and heritage sensitivities identified in the supporting Heritage Impact Assessment and the Landscape Visual Appraisal;**
- **Landscaping of the east boundary to minimise the visual impact of the development on views towards the site from the east and to reflect the edge of settlement location;**
- **Protection and reinforcement of the Priority Habitat hedgerow along the south boundary of the site;**
- **Historic Environment Record is consulted to determine the need for any archaeological surveys prior to development;**
- **On and off-site highways works to include localised improvements to the existing pedestrian network, as well as improvements to the existing highway visibility along the site frontage.**

15. Forncett St Mary and Forncett St Peter

Form and character

Forncett St Mary and Forncett St Peter are both linear in form and have developed along Aslacton Road/ Low Road which follows the line of the Tas Valley. The buildings comprise mainly farms and cottages interspersed with open fields and more recent development. The majority of new development has taken place at Forncett St Peter. A Conservation Area is drawn around most of the settlements and numerous listed and historic buildings feature within it. The undeveloped flood plain of the River Tas valley is located to the east.

Services and Community Facilities

The cluster's school is in Forncett St Peter, with Forncett St Mary housing the village hall. There is a limited bus service to Norwich and Diss.

Settlement Limit

The Settlement Limit has been drawn around the cluster of linear development at Forncett St Mary, leaving the more dispersed outlying areas outside and around the existing built-up area of Forncett St Peter. This is to prevent the linear spread of the settlement into the surrounding valley landscape. The Settlement Limit as defined for these settlements allows for limited infill development, maintains the space between the two villages and conserves the rural character of the area.

16. Gillingham, Geldeston, and Stockton

Form and Character

Gillingham

The historic core of the village lies along The Street and Loddon Road, with a further cluster of development along Kings Dam to the west. Estate development has occurred north of The Street, and the majority of the village (contained within the Settlement Limit) is now in a nucleated form. The older part of the village is characterised by substantial tree planting along Loddon Road, in particular the wooded area to the east and the line of trees along Forge Grove which are protected by a Tree Preservation Order.

The village is set in the Waveney Valley and adjacent to the Broads, and open views out from the village make an important contribution to its rural character. The southern fringes of the parish lie within the Broads Authority area. The attractive area around Gillingham Hall and its park was designated as a Conservation Area in 1994. The parish is well served by the A146 (providing direct links to Beccles, Lowestoft, Loddon and Norwich) and the A143 (access to Bungay, Gt Yarmouth, and to the A140 and Diss). The former B1140 provides access to Thurlton and Norton Subcourse.

Geldeston

The main concentration of development is around Geldeston Hill and The Street, with a small detached cluster at West End and isolated Dockeney and Dunburgh Hill. The village has developed in a linear form along The Street with a small post-war council housing estate, The Kells, having been developed by Tayler & Green to the west of Geldeston Hill. Some infill development has occurred along The Street. The A143 to the north of the parish provides a direct road link to Bungay, the A140 and Diss to the west and Beccles and Great Yarmouth to the east and to Lowestoft and Norwich via the A146. Much of the parish to the south of the village lies within the Broads Authority area.

Stockton

Stockton is a sparsely populated parish consisting mainly of individual dwellings and farms set in open countryside. There is a small cluster located around the Church. The A146 runs through the parish and provides direct access to Norwich and Beccles. The A143 in the south provides access to Bungay.

Services and Community Facilities

The cluster has a range of social and community facilities comprising a primary school and motel in Gillingham and a village hall and pub in Geldeston. Gillingham has a regular bus service to all local towns. There is a more limited bus service in Geldeston, to Diss, Bungay, Beccles and Yarmouth. There is a petrol station, with a convenience store, and fast-food restaurant to the north at the A146/A143 roundabout.

Settlement Limit

Gillingham

The Settlement Limit is in two parts. The first includes the main built form of the settlement. The second part is around the school and adjoining housing, an area which has been extended to include the recent development at Daisy Way.

Geldeston

The Settlement Limit has been drawn to include the two main built-up forms of the settlement along The Street and The Kells, including the small allocation west of Kells Way made within the 2015 Local Plan. The boundary also includes a small cluster of dwellings east of Geldeston, off The Street.

Site allocations

VC GIL1

The site lies to the south of a detached area of existing residential development and Gillingham St Michael's Primary School, south of Geldeston Road/The Street, at the western end of the village. The site is well located for the local services, including a newly created pedestrian and cycle route to services at the A143/A146 junction, and buses on the main Norwich/Beccles route. Main facilities in Beccles are also within a reasonable cycling distance of the site.

It is proposed that there is a single vehicular point of access from the recently completed Daisy Way, part the GIL 1 allocation in the 2015 Local Plan. The recent development provides a suitable access onto The Street, and localised improvements have been implemented along the site frontage. Footpath Gillingham FP12 currently runs diagonally (north-west/south-east) across the western end of the site; although the path appears to have been informally diverted around the field margins, the official route will either need to be incorporated into the design and

layout of the scheme or will require formal diversion. This will also connect the site into Footpath Geldeston FP8, which runs south to Kings Dam.

The site will require a comprehensive approach to landscaping, reflecting the fact that there is only existing development on the northern boundary. Whilst largely contained in the wider landscape, the more localised impacts development could be significant. A landscaping scheme has been agreed for the existing GIL1 allocation (application ref. 2019/1013) and consideration will need to be given as to how this is carried forward under proposals for this allocation. The western boundary of the site has some established vegetation that will require protection and enhancement as necessary. Careful consideration will need to be given to the southern and eastern boundaries, which are open to the remainder of the wider field and adjoining paddocks. Particularly important will be consideration of views from the Broads Authority area to the south, at Kings Dam and beyond, and from the public rights of way Geldeston FP8 and Gillingham FP12. Consequently, a full Landscape Assessment will be required to accompany any planning application(s) for the site.

At the Regulation 18 stage of the VCHAP the site boundaries were drawn further to the east and included areas within Flood Risk Zones 2 and 3a and tidal flooding. Following the outputs of the Stage 2 Strategic Flood Risk Assessment (SFRA), the site boundaries were moved further east. However, this also incorporates areas at both surface and fluvial (Zones 2 and 3a) flood risk in the south-western corner and a remaining small area of tidal flooding in the southeast corner, which it is recommended are left undeveloped. Development of the site will require a site-specific Flood Risk Assessment (FRA) and strategy, to inform the layout of the site.

The site is immediately south of Gillingham St Michael's Primary School and would landlock the school if developed out in its entirety. The VCHAP currently proposes 35 dwellings on this site and a further 20 within the school catchment at Geldeston (VC GEL1), which would add a modest number of pupils to the school. As both villages also experienced growth under the 2015 Local Plan and Gillingham has other sites that were shortlisted in the VCHAP Regulation 18, which are still being actively promoted, it would be reasonable to expect that there will continue to be growth in the future. As such, the County Council has requested that 0.5ha of land be safeguarded for the expansion of the Primary School, that would facilitate integration with remainder of the site when brough forward.

The site is noted as being amber for great crested newt, due to the pond adjacent to the school. The site is also within an SSSI Impact Risk Zone and, as a development of over 10 units, is likely to require consultation with Natural England.

Although the site is 2.36ha, the allocation is for approximately 35 dwellings, reflecting the need to safeguard 0.5ha of land for F1(a) use for the Primary School and the need to address flood risk issues.

Policy VC GIL1: South of Geldeston Road and Daisy Way

2.36ha of land is allocated for approximately 35 dwellings.

The developer of the site will be required to ensure:

- **Vehicular and pedestrian access via Daisy Way;**
- **Pedestrian links to footpaths Geldeston FP8 and FP9 to the west of the site;**
- **The facilitation of the formal diversion of footpath Gillingham FP12, or the incorporation of the formal route into the layout of the site;**
- **A site-specific Flood Risk Assessment (FRA) and strategy that has regard to the issues identified in the Stage 2 VC Strategic Flood Risk Assessment (SFRA), to inform proposals for the site and preparation of a Flood Warning and Evacuation Plan;**
- **A full Landscape Assessment to inform the scale, form and density of the development, as well as the extent of the protection and enhancement of the existing vegetated boundaries;**
- **0.5ha of land set aside for Use Class F1(a), for future expansion of Gillingham St Michael's Primary School**.

VC GEL1

The site lies north of Kell's Way, Geldeston and forms an extension of the recently completed development on the 2015 Local Plan Allocation GEL 1 and is well related to the built form of the settlement. The site is well located for the pub, village hall and recreation ground and the bus route between Beccles and Diss.

There is a single vehicular point of access from the recently completed extension to Kell's Way, which will allow for a continuation of the Type 3 road into the site.

Careful consideration will need to be given to the scale and density of development, to prevent intrusion into the wider landscape. The site is open to the existing recreation ground to the east, from which there will be views into and out of the site. The site rises from Kell's Way to the northern boundary, and consideration will need to be given to the scale, height and density of development in order to (a) protect the residential amenity of the properties which sit at a lower level and (b) minimise the visual impact of development on the higher parts of the site, particularly from the Broads Authority area to the south. The northern boundary is the highest point of the site, and there will be some views of the site from Old Yarmouth Road; however, this boundary has some established vegetation which will need to be retained and reinforced.

To the east of the site is the Geldeston Conservation Area, which is focussed on the Tayler and Green 'Kell's Estate' development. This development evolved over many years and worked with the topography of the location to create a clear sense of place. Development of this site should respect the form and layout of the Kell's Estate. The Heritage Impact Statement concluded that there would be no harm to the three Grade II Listed Buildings closest to the site, but that the finds and earthworks identified on the Historic Environment Record mean that investigation will be required prior to development.

The allocation is for 0.76ha for up to 20 dwellings, an area that is considered to be appropriate to allow for a scheme that addresses the landscape matters noted above, as well as the standard infrastructure requirements.

Policy VC GEL1: North of Kell's Way

0.76ha of land is allocated for up to 20 dwellings.

The developer of the site will be required to ensure:

- **Vehicular and pedestrian access from Kell's Way;**
- **A Topographical Survey and full Landscape Assessment to inform the scale and density of the development which should; reflect the existing housing within the Conservation Area, address the change in levels of the site and protect the residential amenity of adjoining houses;**

- **Protection and enhancement of the existing vegetation on the site boundaries, particularly the established vegetation on the Old Yarmouth Road boundary.**
- **Historic Environment Record is consulted to determine the need for any archaeological surveys prior to the development**.

17. Hales and Heckingham, Langley with Hardley, Carleton St Peter, Claxton, Raveningham and Sisland

Form and Character

Hales

Development in Hales has been concentrated around Yarmouth Road east of the A146 Beccles Road. Individual dwellings and farmsteads are sparsely distributed through the remainder of the parish.

The village has developed along the historical road network of Yarmouth Road, School Lane and Briar Lane. There has been significant modern infill development together with some limited estate development which has resulted in a more nucleated settlement form.

The village is set in an attractive valley landscape which contributes to its rural setting. Hales is adjacent to the A146 which provides a good link to Norwich, Beccles and Loddon whilst the B1136 provides relatively good access to Haddiscoe, and then to Great Yarmouth via the A143.

Heckingham

Part of the built up area of Hales lies within the parish of Heckingham, however the remainder of the settlement is sparsely populated comprising a small number of dwellings and farmsteads set in open countryside and the Broads Authority area. The A146 to the south of the settlement provides a good link to Norwich.

Carleton St Peter

Carleton St Peter is a sparsely populated parish consisting of a small number of individual dwellings and farms set in a predominately valley landscape.

Langley with Hardley

Development within the parish has been concentrated into three small groups at Langley Green, Langley Street and Hardley Street with individual dwellings and farmsteads widely dispersed throughout the remainder of the parish. The three groups of development are set on the edge of Langley and Hardley Marshes within the Yare Valley. In the west of the parish is the historic parkland of Langley Park. The character of the developed areas is of a dispersed nature comprising small scattered ribbons of development together with the attractive valley setting combine

to give the area an attractive rural character adjacent to the Broads, with much of the parish within the Broads Authority area.

Claxton

Development within the parish has been concentrated along The Street with a few isolated dwellings and farmsteads scattered throughout the remainder of the parish. The village, located on the edge of the Broads Area, is set in the attractive Yare Valley with extensive marshlands to the north and a gently sloping valley to the south.

The village has a strong linear settlement form with dwellings generally set back from the road although the older cottages at the east end of The Street are built-up close to the road in a traditional style.

Raveningham

Raveningham displays a dispersed rural settlement pattern consisting of individual dwellings and farms set in open countryside with significant areas of woodland, in particular the historic parkland of Raveningham Park. The parish has good access to Haddiscoe and the A143 to the east and Hales, Loddon and A146 to the west.

Sisland

The parish is sparsely populated consisting of a few individual dwellings and farms set in an attractive valley landscape. Mundham Road which runs immediately south of the parish provides direct access to Loddon and the A146.

Services and Community Facilities

Hales has a range of social and community facilities including outdoor recreation space and a shop at the Hales Service Station on the edge of the village, public house and some local employment opportunities. Hales has a regular bus service to all local towns. Claxton and Langley both have a village hall. Claxton also has a limited bus service to Norwich. Hales has a continuous footpath along the A146 to Loddon.

Settlement Limit

Hales

The Settlement Limit has been drawn to include the main built form of the settlement, development around the former Hales Hospital and land allocated within the 2015 Local Plan, adjacent to the former Hales Hospital (HAL1).

Claxton

The Settlement Limit has been drawn to include the main built form of the settlement that is within South Norfolk and allows for some limited infill development. Much of the surrounding area falls within the Broads Authority area.

Site allocations

VC HAL1

The site is located to the east of Hales, between Briar Lane to the north-west and the previous housing allocation site (formerly HAL1, now VC HAL2), immediately to the south. Further to the east is the former Hales Hospital, a listed building, now converted to residential use. Residential development also abuts the west of the site. The B1136 runs parallel to the site frontage of VC HAL2 and an existing pedestrian footway along this route provides direct pedestrian access to Loddon to the north-west.

Development of the site will have a limited visual impact from the south as it is will be sited to the rear of VC HAL2; however, currently there are views into the site from the north, particularly from Briars Lane, as well as some views from the and the connecting Public Right of Way to the north-west of the site (Heckingham FP2). The changes in ground levels to the north of the site mean that development in this location will be prominent. Existing vegetation along the north, north-east and north-west boundaries is sparse but includes some established trees. These trees will need to be retained and protected and appropriate additional landscaping incorporated along these boundaries to minimise the visual impact of the development on these wider views into the site. The site layout will need to successfully integrate the site into the rural landscape through appropriate design, density, scale and landscaping.

Views across the site towards the former Hales Hospital are contained to the north section of the site. Tree coverage around this designated heritage asset restricts direct views iof this building however the landscaping contributes to its setting of the building and views towards it should be incorporated into the site layout, possibly through the inclusion of single and 1.5 storey dwellings in the north-east of the site. In addition to the listed building, earlier archaeological records suggest the site is adjacent to an area that was likely to have been a significant Iron Age settlement and a significant Roman settlement. Liaison with the Historical Environment Service will

be required as part of the planning application process to determine the requirement for further archaeological investigation.

Currently there is no vehicular access into the site from the B1136 however development of VC HAL2 will facilitate this connection and provide a safe access onto this road. Access to the site from Briars Lane will not be permitted due to its narrow width and rural character. Footpath connectivity from within the site to Heckingham FP2 should be incorporated into the site layout and design, as should the connectivity between VC HAL1 and VC HAL2 to ensure a cohesive relationship between these sites.

Discussions with the Lead Local Flood Authority (LLFA) have identified the presence of a significant surface water flowpath in the 0.1AEP event running south-north through the site. The Stage 2 Village Clusters Strategic Flood Risk Assessment (SFRA) confirms that the existing flowpath route will need to be incorporated into the site layout and design. Diversion of the flowpath is not an acceptable design solution and a Flood Risk Assessment (FRA) will be required to determine the layout and drainage strategy for this site, taking account of the issues identified in the Stage 2 VC SFRA. Due to the relationship between VC HAL1 and the 2015 Local Plan allocation to the south a comprehensive drainage strategy would be preferred by the LLFA to maximise the potential benefits of a drainage strategy in this location. This should be explored by the developer of the site, unless otherwise agreed with the Local Planning Authority.

The Minerals and Waste Authority has also identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan.

An area of 2.48ha is allocated for up to 35 dwellings on this site and is considered reasonable to ensure that the constraints identified above, particularly the visual impact and the relationship with the adjacent heritage asset as well as the identified surface water flowpath, may be incorporated appropriately into the final site layout and design.

Policy VC HAL1: Land off Briar Lane

2.48ha of land is allocated for up to 35 dwellings.

The developer of the site will ensure:

- **A single point of vehicular access into the site via the 2015 Local Plan HAL1 allocation (south of the site) only;**
- **Connectivity between VC HAL1 and the development to the south of the site to be incorporated into the site layout and design unless otherwise agreed with the LPA. This will include landscaping, vehicular and pedestrian access, design and layout and infrastructure strategies to ensure a strong relationship between the sites and a complementary form of development;**
- **A pedestrian access from the site to connect to Heckingham FP2;**
- **Site design to retain views towards the former Hales Hospital from Briar Lane and FP2;**
- **Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development;**
- **A site-specific Flood Risk Assessment (FRA) and strategy to inform the layout of the site, including access arrangements. The FRA must have regard to the requirements set out in the Stage 2 VC Strategic Flood Risk Assessment;**
- **Retention, protection and enhancement of existing trees and Priority Habitats along the east, north and west boundaries to minimise the visual impact of the development and integrate the site into the surrounding countryside.**

Carried forward allocations

VC HAL2

Previously called HAL1, this allocation from the 2015 Local Plan is carried forward within this document to ensure that development on the site continues to be achievable in an appropriate manner. The site comprises the southern part of a field in between the existing main part of the village and development around the former Hales Hospital. The site has some significant changes in the topography.

An application for 23 dwellings on a larger site area has been submitted and is currently pending determination (2022/0287). The site is adjacent to, and is currently within the same control as, allocation VC HAL1 to the north. To ensure a comprehensive form of development is achieved opportunities to maximise the

connectivity between the sites should be explored as far as possible via the development management process. Accordingly, the HAL1 allocation text (now VC HAL2) has been updated to reflect both the boundaries of the planning application and the uplift in the site numbers that is achievable on the larger site.

Policy VC HAL2: Land at Yarmouth Road west of Hales Hospital

1.8 hectares of land is allocated for housing and associated infrastructure for approximately 23 dwellings. This site is expected to be built out in accordance with the existing planning permission (2022/0287). Any new planning permission will need to ensure the following:

- **Site layout and design to facilitate both vehicular and pedestrian access through the site to VC HAL1 to the north;**
- **Opportunities to provide for the connectivity of the site with VC HAL1 to be incorporated into the site design including access points (vehicular and pedestrian) between the sites, the drainage strategy and layout and landscaping unless otherwise agreed with the LPA;**
- **A drainage strategy and site layout that responds to the presence of the on-site surface water flowpath along the west side of the site;**
- **Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development.**

18. Hempnall, Topcroft Street, Morningthorpe, Fritton, Shelton and Hardwick

Form and Character

Hempnall

The main settlement of Hempnall comprises of development along the lines of Broaden Lane, The Street, Mill Road / Bungay Road and Field Lane. Originally a linear settlement based on the historic road network, the village has developed a more nucleated settlement form mainly as a result of modern estate development to the east of Broaden Lane and east of Field Lane. The village has also experienced significant infill development. There is also isolated ribbon development at Hempnall Green to the south-east of the village. The B1527 runs through the parish providing good access to the A140 and Long Stratton to the west and to the B1332 and Bungay to the east.

Morningthorpe and Fritton

The parish displays a largely dispersed settlement pattern with the exception of two areas of settlement which have developed at Morningthorpe and Fritton. Morningthorpe is a minor settlement grouping comprising a small number of dwellings. Fritton was originally a loose collection of properties set back from the large central common, but infill development has led to a concentration of dwellings at the north end of the hamlet. The remainder of the parish is predominately rural.

Topcroft

The main concentration within the parish has taken place along The Street with a cluster of houses located at Church Road away from the main part of the village. Individual dwellings and farmsteads are dispersed throughout the remainder of the parish.

Development along The Street has resulted in a linear settlement form characterised by one plot depth development mainly to the east side of the road, with the west side characterised by more open frontages interspersed with a number of farms set back from the road.

The large open areas, views of the surrounding countryside and good tree and hedge planting along much of The Street, are all important in maintaining the rural character and setting of the village.

Shelton and Hardwick

Development within the parish has been concentrated at Hardwick with a small isolated cluster at Shelton and individual dwellings and farmsteads dispersed throughout the remainder of the parish.

Hardwick has developed a linear settlement form based along Mill Road, Hall Lane and The Street characterised by one plot depth development.

The village comprises three distinct areas. The first is based along Mill Road and comprises generally modern development. To the north-west of this area and separated by a large open field is a limited ribbon of development along Hall Lane. The third main area is the main core of the village along The Street. The three parts of the village give it an attractive rural character set in a flat and open landscape but with an attractive river valley immediately to the north.

Services and Community Facilities

Hempnall has a good range of social and community facilities including a primary school, a number of shops, post office, surgery, garage, community centre, village hall and recreation field. There is another pub at Hempnall Green, and a cricket pavilion/social club at Topcroft. Hempnall and Topcroft have a limited bus service to Norwich.

Settlement Limit

Hempnall

The Settlement Limit has been drawn to include the main built form of the settlement. In addition, the boundary includes land at Willow Drive, the former allocation in the 2015 Local Plan. Development has occurred in the form of isolated clusters of housing along Field Lane (south of the village), Lundy Green, Road Green, Silver Green and isolated ribbon development at Hempnall Green.

Topcroft

Due to the proximity of the Flood Zones and the rural character of the settlement, the Settlement Limit has been drawn around the built form of The Street. The open areas to the front of Street Farm and Trees Farm, which are recognised for their importance in contributing to the street scene and rural character of this settlement, have been deliberately excluded from the Settlement Limit.

Shelton & Hardwick

The Settlement Limit has been drawn around two of the more built up areas of ribbon development at Shelton to allow for very limited development within the boundary. Corner Farm has not been included within the Settlement Limit in order to maintain the important open spaces around it and the separation of the two parts which characterises the village.

Site allocations

VC HEM1

The site is located south of Mill Road, to the south-west of Hempnall Mill Centre (formerly Hempnall Mill). To the north of the site are allotments, to the east is existing housing, whilst to the west and south is agricultural land. The site lies within the north-east corner of a larger agricultural field. Residential development to the east is of modest scale and single storey in form. The village benefits from a number of facilities and services including a community centre and separate village hall, a shop and primary school. All of these are accessible by pedestrian footpath.

The site is level but is located at the crest of a valley. There are no existing landscape features on the site although its elevated position facilitates some views of the B1527 (Mill Road) to the north. A Public Right of Way (PROW) (Morningthorpe FP6) runs north-south to the west of the site and it is likely that some limited views of the site will be visible from sections of this footpath however these will be filtered by the intervening vegetation between the site and the PROW. New residential development will also be seen in the context of the existing settlement. The existing development at Millfields benefits from vegetation along the southern boundary and this will need to be continued along the newly created south and west boundaries of the site to integrate the site into the countryside and avoid the introduction of a harsh edge to the settlement.

Hempnall Mill, a Grade II listed building now in use as a community centre, is to the north-east of the site. Key views towards the mill are from Mill Road further to the north and on the approach to the site along Millfields to the east. The supporting Heritage Impact Assessment (HIA) has identified that, with appropriate mitigation measures, development in this location will not have a significant impact on the setting of the listed building and offers potential opportunities to enhance the setting of the mill if additional views are opened up to the public. Possible ways to achieve this include; single storey development, low level landscaping across the site and, if possible, the reduction in height of some of the existing vegetation adjacent to the site.

Vehicular and pedestrian access to the site will be via Millfields. In accordance with the requirements of the Highways Authority the existing access road will require carriageway widening and the addition of a footpath in order to ensure continued highway safety. The presence of a small infrastructure compound adjacent to the site access may result in a need to reconfigure some of the existing parking arrangements for current Millfield residents, however due to the land ownership of both sites this is considered to be achievable. The developer of the site is advised to engage with the Highways Authority at an early opportunity to determine the requirement for a pedestrian crossing at Mill Road which would facilitate access from the site to the services and facilities located to the north of this road.

The site is identified as being within Groundwater Protection Zone 3 which would not preclude development but early liaison with the Environment Agency is recommended regarding the protection of water quality.

A site area of 0.35ha is proposed for up to 15 dwellings. Discussions with the site promoter have proposed a scale of development similar to the existing older persons housing at Millfields. As such this would likely comprise a higher number of small one- and two bedroom dwellings which would not accord with the current housing requirements as set out in the Strategic Housing Market Assessment (SHMA). Should an alternative housing mix be necessary this may reduce the number of dwellings that can be achieved on the site.

Policy VC HEM1: Land at Millfields

0.35ha is allocated for up to 15 dwellings.

The developer of the site will be required to ensure:

- **Development comprises single storey dwellings only in order to avoid landscape and heritage impacts arising, as well as to ensure compatibility with the existing development at Millfields (including preserving the amenities of existing and future residents);**
- **Appropriate boundary treatments and landscaping along the south and west boundaries of the site to reflect its edge of settlement location, as well as the setting of Hempnall Mill Centre;**
- **Protection and retention of existing vegetation along the east boundary of the site;**
- **On and off-site highway works to include carriageway widening of Millfields in order to facilitate safe vehicular and pedestrian access to the site;**
- **Discussions with the Highway Authority to establish the need for a pedestrian crossing across the B1527 (Mill Road) to facilitate access to the service to the north of the road.**
- **Historic Environment Record is consulted to determine the need for any archaeological surveys prior to the development**.

19. Heywood

Form and character

Heywood is a sparsely populated parish. It is predominately rural in nature and the majority of dwellings/farmsteads that have developed are along Heywood Road. To the south of the parish lies Diss and Heywood Road provides direct access to the town.

Services and Community Facilities

The settlement has very limited facilities, although there is pre-school provision.

Settlement Limit

There is currently no Settlement Limit in Heywood.

20. Keswick and Intwood

Form and character

Keswick

Keswick is a very rural parish despite abutting Norwich, with development concentrated on Low Road. To the south of Low Road there is an established frontage between Glebe House and Low Farm. The dwellings on Low Road are located within the Yare Valley but to the east of these there is an important gap which offers views to the crest of the valley side from the south.

To the north of Low Road there are a handful of buildings scattered along its frontage. At the eastern end is Hall Farm occupying a prominent location which helps to give Keswick its rural character.

Detached from the development on Low Road are isolated pockets of dwellings including the Keswick Mill area, an attractive area next to the river and designated as a small Conservation Area. In addition, there are other individual and groups of dwellings, and farms isolated from the main developed ribbon, set in partially wooded countryside. In the south of the parish, the former education college based on Keswick Hall, which is a Grade II listed building, has been converted to residential use which has ensured the continued use of this important building. The parkland setting of the Hall contributes to the overall attractiveness of the landscape in the area.

The parish of Keswick stretches along the B1113 linking with the A140 Ipswich Road into Norwich.

Intwood

The settlement of Intwood lies south of Keswick and the A47. This area is predominately rural with isolated dwellings and farmsteads.

Services and Community Facilities

These are very limited comprising a small community hall and recreation field. There is a regular bus service to Norwich and Mulbarton along the B1113.

Settlement Limit

The Settlement Limit has been drawn around the existing built up area at Low Road to prevent further extension into the surrounding countryside and excluding parts that are within Flood Zones 2 and 3.

A Settlement Limit has also been drawn at land between B1113 and A140 roads for a new employment allocation to provide small workshop, light industrial B1 uses and provision of an access road from the B1113 to the A140.

21. Ketteringham

Form and character

Ketteringham is a small village which lies to the south of the new A11 and the Norwich - Ely railway line. The village has developed in a linear form along The Street and Low Road. The council depot and waste-recycling/paper recycling plants in the parish are separated from the residential area. There is a smaller outlier of development to the south of the village around the Church and Ketteringham Hall.

Some infilling has taken place along The Street and Low Road, but the total number of dwellings is still low. The setting of the village within open countryside is made apparent by the significant breaks in the built-up area to the north of The Street around the War Memorial and between ‘Cytringa’ and ‘Thatched Cottage’ to the south of Low Road. These afford views over the surrounding countryside. The area around Ketteringham Hall is distinctly separate from the main part of the village. The grounds of Ketteringham Hall are of considerable archaeological importance.

Services and Community Facilities

There are limited services available comprising a village hall, preschool facilities and small garage. Further employment is available at the cluster of industrial units to the north-east.

Settlement Limit

The Settlement Limit has been drawn to include the main built form of the settlement. Due to the setting of the village in open countryside and limited service and facilities available, the boundary has been defined to allow only very limited infill development.

22. Kirby Cane and Ellingham

Form and character

The main development of Kirby Cane and Ellingham is concentrated in what has developed into a nucleated settlement around Mill Road, Mill Lane and Yarmouth Road, with significant estate development south of Yarmouth Road and on a more limited scale to the east of Mill Road and Mill Lane. There has also been a significant amount of infill development. The A143 provides a good link to Bungay, the A140 and Diss in the west and to Beccles, the A146 and Great Yarmouth to the east. The southern fringes of the parish lie within the Broads Authority area.

Services and Community Facilities

The settlement has a range of social, recreational and community facilities including a preschool, primary school, shop, post office, restaurant and village hall. There are several employment opportunities and a limited bus service to Diss, Bungay and Beccles.

Settlement Limit

The Settlement Limit has been drawn to include the main built form of the settlement, excluding the separate developments at Yarmouth Road and Mill Pool Lane.

Site allocations

VC ELL1

The site lies south of Mill Road, between the existing development and the recreation ground. The site is well located for access to the local services and facilities including the primary school, Memorial Hall, recreation ground and village shop, as well as some bus services to towns within the Waveney Valley.

A single point of access is proposed from Mill Road. It is likely that the access will need to be towards the western side of the site frontage in order for the required visibility splays to be achieved. Carriageway widening and a footway widened to 2 meters will be required across the site frontage, connecting with the existing footway and to the adjoining recreation ground. The developers of the site will also be required to work with the Highway Authority to promote an extension to the current 30mph speed limit. A surface water flow path runs along Mill Road. Careful

consideration will need to be given to the highways design to avoid the flow path being diverted into the site.

Achieving the visibility splays is likely to require the removal of the frontage hedgerow. This will open up views across the wider River Valley landscape to Ellingham Conservation Area and the Grade I listed St Mary's Church, both of which fall (principally) within the Broads Authority Area. To retain these views, the allocation does not fill the whole of the frontage between the existing housing and the recreation ground and consideration should be given as to how any development affects these longer distance views. Footpath Ellingham FP3 runs south-west/north-east, to the south of the site, between the village and the edge of the Broads Authority area at the old railway bridge and the site can also be seen form the surrounding road network, parts of which form part of National Cycle Route 1. When viewed from the south and west the development will be seen against the backdrop of existing housing on Mill Road, however, consideration will need to be given as to how to best mitigate the impact on any views from the Broads Authority area, the Conservation Area and the footpath and road network. It should also be noted that an existing high-pressure pipeline runs north/south immediately east of the recreation ground, and a suitable easement would need to be left either side of this, within the open area of land.

The site is part of a larger agricultural field and, combined with retaining the gap to the recreation ground, this means the allocation has no defined physical boundaries to the south and west. Consequently, careful consideration will need to be given to the design and layout of the site which avoids an overly (sub)urban edge to the development. Consideration should be given to development facing, rather than backing, onto the open countryside, particularly as the access is likely to be to the western edge of the site. Consideration should also be given to appropriate planting on these boundaries.

The site wraps around existing dwellings on Mill Road, and particular consideration will need to be given to the impact on the amenity of those dwellings.

As a site over 1ha which is underlain by safeguarded sand and gravel resources, development would need to comply with the relevant policies of the Minerals and Waste Local Plan.

The allocation of 1.87ha of land for approximately 25 dwellings is reasonable to ensure that the impacts on the wider landscape, as well as the identified gas pipeline and associated easement, are appropriately mitigated through a suitable site design.

Policy VC ELL1: South of Mill Road

1.87ha of land is allocated for approximately 25 dwellings.

The developer of the site will be required to ensure:

- **Highways works to include access from Mill Road to the western edge of the allocation to achieve the required visibility, along with appropriate carriageway widening on Mill Road, to achieve safe access, and provision of a 2-meter-wide footway between the existing provision and the recreation ground;**
- **Promotion of an extension to the 30mph speed limit on Mill Road, in conjunction with the Highway Authority;**
- **A Landscape Visual Impact Assessment (LVIA) submitted alongside any planning application to ensure that the design, layout and landscaping of the site appropriately takes into account the River Valley landscape, with particular attention to views to/from the Broads Authority area, Ellingham Conservation Area and the listed St Mary Church, and views from the surrounding footpath and highways network;**
- **Layout and boundary treatments to respect the transition to the rural area;**
- **The impact on the residential amenity of the existing properties on Mill Road, adjoining the site is minimised.**

VC ELL2

The site lies to the west of Mill Lane, to the rear of existing development accessed via Florence Way. Whilst there is currently no pedestrian footpath along Mill Lane a Public Right of Way, Ellingham FP3, connects the site to the main settlement and its existing services and facilities including Ellingham VC Primary School. Public Right of Way Ellingham FP2 also connects the site to Mill Lane further to the west.

Views of the site from the countryside, including from Ellingham FP2/FP3, will be seen against the backdrop of existing built form on both Florence Way and Mill Lane and will not represent a significant intrusion into the countryside.

A modest area of open space and some immature landscaping forms part of the existing scheme at Florence Way and lies adjacent to the eastern boundary of the site. Opportunities to integrate VC ELL2 with the existing properties and the soft landscaping at Florence Way should be explored as part of the site layout and design. However, the existing southern boundary of the site should be strengthened to provide some mitigation for the visual impact of the development from Ellingham FP3. For the same reason a suitable boundary will be required along the western boundary of the site.

The existing vehicular access along Florence Way is an unadopted highway and will require upgrading to facilitate access to the new development. The Highways Authority have confirmed that a number of additional on- and off-site highways works will be required to ensure highway safety is maintained. These include; localised improvements to Florence Way, improvements to Ellingham FP3, securing sufficient land to ensure appropriate visibility splays can be created and retained along Mill Lane and localised carriageway widening to Mill Lane to the north of the site. A significant tree located at the junction of Florence Way and Ellingham FP3 and must be protected and retained as part of any highway improvement works.

The site is identified as being within Groundwater Protection Zone 3 which would not preclude development but early liaison with the Environment Agency is recommended regarding the protection of water quality.

The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan.

The site is allocated for at least 12 dwellings on a site area of 0.51ha, which is considered to be a site area reasonable to reflect the density of development adjacent to the site.

Policy VC ELL2: Land at Florence Way

0.51ha of land is allocated for at least 12 dwellings.

The developer of the site will be required to ensure:

- **Protection of the significant tree located at the junction of Ellingham FP3 and Florence Way as well as the protection, reinforcement and enhancement of the existing vegetation along the south and west boundaries of the site;**
- **A scale of development and site layout that integrates successfully with the existing development at Florence Way;**
- **Improvements to Ellingham FP3 to ensure pedestrian connectivity to the existing local footpath network is to an acceptable standard;**
- **Off-site highway works to to include: upgrade to the existing access into Florence Way to facilitate access into the site and carriageway widening of Mill Lane to the north of Florence Way to improve highway safety**.

23. Little Melton and Great Melton

Form and Character

Little Melton

Little Melton was historically linear in form, but some estate development has taken place at Ringwood Close, Gibbs Close and south of School Lane at Braymeadow Lane and Greenacres. The village is set in open countryside, and is visible from Watton Road to the north, creating a landscape setting when approaching the village from Green Lane. However, hedges and trees to the south of the village mean there are fewer long-range vistas.

The proximity to the A47 (via Green Lane) makes Little Melton accessible from Norwich.

Great Melton

Great Melton comprises a scattering of farms and cottages with a loose knit group of dwellings at High Green. To the north of High Green there is an area forming Great Melton Park.

Services and Community Facilities

Little Melton has a range of services and community facilities including the primary school, preschool facilities, shop, pub and garage. There are allotments, accessible from Great Melton Road and Mill Road, which contribute to the rural nature of the village. The village hall and playing field are on Mill Road, outside the Settlement Limit and in a countryside setting. There is a lack of footpaths in the village, which combined with narrow roads, makes pedestrian travel challenging at peak times. There is a semi-regular bus service to Norwich, Wymondham, Hethersett.

Settlement Limit

The Settlement Limit has been drawn to include the main built form of the settlement and include the land allocated within the 2015 Site Allocations Plan (LIT 1) located south of Ringwood Close. The Settlement Limit has also been updated to include recent developments at All Saints Close (north of Mill Road), minor planning permissions along School Lane (2016/1105 and 2017/0251) and a further planning permission south of School Lane and east of Burnthouse Lane (2017/2843). Following a site assessment, part of a site promoted through the Plan process has

been included within the amended Settlement Limit on land north of Great Melton Road. The Settlement Limit excludes the allotments which run between Great Melton Road and Mill Road.

Site allocations

VC LM1

The site is in the centre of Little Melton, with good access to local services and facilities, including the bus route between Wymondham and the Norfolk and Norwich University Hospital. The main frontage of the site lies to the south of School Lane, immediately opposite Little Melton Primary School and the Village Inn public house. The site extends south to the boundary with Meadowbrook Farm, and then west to Burnthouse Lane. The site wraps around Elm Farm and the adjoining bungalows at 32 School Lane, and incorporates the listed barn associated with Elm Farm. Immediately to the northwest a recent permission for 30 dwellings (2019/2485) was under construction at the time of preparing this document.

Whilst the site has frontages to both School Lane and Burnthouse Lane, the single point of pedestrian and vehicular access will be from School Lane. The School Lane frontage is in the heart of the village and has existing footway links to the main local services and facilities. Improvements to the frontage footway will be required for this development. Conversely, Burnthouse Lane is very rural in nature, with an established hedgerow, and is narrow with no footway connections to the local services and facilitates. As the site is opposite the Primary School it is proposed to incorporate a small off-road parking area, to alleviate localised on-carriageway parking associated with the primary school. An additional access also exists to Braymeadow Lane to the southeast, which could provide pedestrian and cycle connectivity for the site, with the latter linking to Hethersett Lane and the Norwich Research Park and Norfolk and Norwich University Hospital as part of the potential extension of the ‘Pink Pedalway’.

The main constraint within the site is the presence of a Grade II listed barn in the southeast section, which links the two main elements of the site on School Lane and Burnthouse Lane. It will be important to protect the setting of the listed building, particularly the open aspect to the south/southeast and the connection to the wider countryside which makes an important contribution to its significance as an agricultural barn. The Historic Impact Assessment (HIA) which supports this plan identifies an area which should be kept clear of development; as such it is proposed

that this part of the site should be set out as informal open space that will integrate with the wider countryside.

The HIA identifies additional areas adjacent to this where the design and layout of development should respect the setting of the listed building and ensure that its significance is not diminished. As the site cannot be accessed from Burnthouse Lane, vehicular and pedestrian access will be required across this open space; however, this should be designed sympathetically to avoid a formal layout/design which would urbanise the environment. The barn itself has undergone some renovation and is used partly used for storage but requires further repair/renovation. Applications for the development of the site should also include proposals which secure the long-term future of the listed barn, which is currently used for storage. Archaeological investigation was undertaken for the development of the adjacent site (2019/2485) and will also be required prior to the development of this site, particularly as linear ditch lines are visible in ariel photographs of the site.

The northern section of the site at School Lane is well contained within the landscape, particularly considering the development currently being progressed on the site immediately to the west. In contrast the Burnthouse Lane section of the site is more open to the wider landscape to the south. Protecting and reinforcing the existing planting on both the southern and western boundaries will help to retain the existing rural approach to the village from the south, and the sense of a gap between Little Melton and Hethersett.

The site contains a number of ecological features, including established trees and hedgerows and ponds. The listed barn has the potential to contain bat roosts and the site is also within an amber zone for great crested newts. As such appropriate ecological surveys would be required with any planning application, covering, but not limited to, the habitats provided by the existing features onsite and the connectivity to wider ecological features in the vicinity, including local ponds.

The site is within the catchment of Whitlingham Water Recycling Centre (WRC) and the in-combination effects with development identified in the GNLP may require phasing of this site beyond the early years of the Plan and early engagement with Anglian Water is recommended.

Although the site is 3.00ha, the allocation is limited to approximately 35 dwellings, which reflects the need to keep the south-east section of the site clear of development to protect the setting of the listed barn, the protection of existing

biodiversity features on site and the provision of a small off-carriageway parking area associated with the school.

Policy VC LM1: South or School Lane and East of Burnthouse Lane

3.0ha of land is allocated for approximately 35 dwellings.

The developer of the site will be required to ensure:

- **Access from School Lane, with potential secondary pedestrian and cycle only access onto Braymeadow Lane;**
- **Footway improvements along the School Lane frontage, to link with existing provision;**
- **Provision of a parking area within the site (adjacent to School Lane) principally for school use, the nature and scale to be agreed with the Highways Authority, the Education Authority and Little Melton Primary School, as appropriate;**
- **South-east section of the site to remain undeveloped, and the layout and design on the adjoining areas to protect the rural setting of the listed barn, as detailed in the Heritage Impact Assessment;**
- **Access across the southeast section of the site, between the two elements to be developed, to be sympathetic to the setting of the listed barn;**
- **Proposals for the site to secure the long-term future of the listed barn;**
- **Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development;**
- **Protection and enhancement of the ecological/biodiversity features of the site, including the established tress, hedgerows and ponds, including appropriate reinforcement of planting on the southern and western boundaries, to contain the development in the rural landscape;**
- **Early engagement with Anglian Water regarding the need to phase development within the catchment of Whitlingham Water Recycling Centre.**

24. Morley and Deopham

Form and character

Morley

Morley (formerly the parishes of Morley St Peter and Morley St Botolph) has a widely dispersed settlement pattern. Historically the settlement has developed around two isolated parish churches and a number of farmsteads.

The main area of development in the parish is located at Morley St Botolph and extends along Chapel Road, The Street and Deopham Road. There is also a significant linear development in the south of the parish at Hill Road, astride the former A11, which adjoins development at Besthorpe within Breckland District and is part of the area covered by the Attleborough and Snetterton Heath Area Action Plan.

The other significant development within the parish is Wymondham College, a large secondary boarding and day school. The College is located in the south of the parish in an area otherwise characterised by isolated and dispersed dwellings and farms.

Deopham

Deopham is a linear village. Whist it does not have a centre it has distinct areas around Low Common, Coldham Green and Deopham Green.

Services and Community Facilities

There is a limited range of facilities that are widely dispersed through the village including a preschool, primary school, pub, village hall and recreation field. Wymondham College, a state maintained secondary boarding and day school provides some local employment opportunities. There is a daily bus service to Norwich and Attleborough.

Settlement Limit

The settlement limits have been drawn to retain the existing wooded character of the settlements while allowing for further limited infill development in the Morley St Botolph area.

25. Mulbarton, Bracon Ash, Swardeston and East Carleton

Form and Character

Mulbarton

Historically Mulbarton developed with buildings mainly clustered around the junctions at three corners of the Common, with further dwellings to the west of the Common. More recently, estate development has taken place on a large scale to the south of The Common which has altered the form and character of the village at the south end. However, as a result of past planning policies, The Common and its setting has otherwise remained largely preserved as an undeveloped space in the centre of the village and is important in terms of both visual amenity and recreation opportunities. There has been little development on the edges of The Common to its east and west in order to preserve its connections to the surrounding countryside, drawing the countryside into the 'core' of the village.

There is also preserved open farmland between the B1113, the western edge of new residential areas south of The Common and the settlement of Bracon Ash which contributes to the rural setting of the village.

The view of the church, north of The Common, is prominent from all parts of The Common. The special character of this area with the church, the hall and the historic barn has been recognised by the designation of a Conservation Area in 1977, which was extended in 1994.

Bracon Ash

The parish of Bracon Ash lies to the south-west of Mulbarton on the B1113. There are three distinct settlement groupings, including the area around the church and the area at Hethel. The main settlement has developed in a linear fashion along The Street, Hawkes Lane and Poorhouse Lane and comprises mainly frontage properties. It is separated from Mulbarton by agricultural land to the south of Cuckoofield Lane which contributes to its individual identity. Within the village, there is an important gap to the north of Mergate Farm, which maintains the segregation between the farm and the village. The B1113 gives reasonable access via the A140 to Norwich.

Swardeston

Swardeston has developed either side of the B1113, with outliers of development around The Common. The historic 'core' of the village is to the west of the main road where there are a number of older cottages facing The Common. More recent estate scale development has taken place to the east of the B1113.

The focus of the village is The Common which occupies some 21 hectares. There has been some limited infilling in the surrounding settlement groups but its character as a large, informal open space crossed by a network of unmade tracks has remained and contributes greatly to the pleasant rural character of the village. There is an outlier of development to the south of the road leading to Lower East Carleton. The landscape to the east of the village is open.

East Carleton

The parish is predominately rural with the main settlement having developed with frontage properties along Rectory Road, Hethersett Road and Wymondham Road.

Services and Community Facilities

Mulbarton possesses a good range of facilities which includes a surgery, pharmacy, two shops, a post office, village hall, recreation field, several takeaway restaurants, the primary school and preschool facilities. There is also a regular bus service to Norwich and a daily service to Diss and East Harling. Swardeston also benefits from the former and Bracon Ash from the latter service. Elsewhere in the cluster there are various local employment opportunities, and Bracon Ash has a village hall.

Settlement Limit

Mulbarton and Bracon Ash

The Settlement Limit has been drawn to include the main built form of the settlement and include the allocated land. The village hall, Old Hall Farm and the church and rectory are excluded, but there are further small clusters of development with boundaries at the north and west of the common. An amendment has been made to include recent development at Long Four Acre Avenue (2017/2131). In Bracon Ash, development at Poorhouse Lane, The Street and Hawkes Lane are included. However, the triangular area of land used as a green, Mergate Farm and the small cluster of dwellings off Mergate Lane have been excluded. Infill development opportunities have been created at The Rosery and Norwich Road in Mulbarton and at Hawkes Lane and the nurseries in Bracon Ash. Recent development at Nursery Close (2017/2807) has been incorporated into the updated Settlement Limit.

Swardeston

The Settlement Limit has been drawn to include the main built form of the settlement and include the previously allocated land west of Main Road. The Settlement Limit is fragmented and has been updated to reflect recent developments at the former nursery site, Bobbins Way (2017/2247). In addition, there is a Settlement Limit around two groups of dwellings to the north and west of the common, on Intwood Lane and The Common.

Site allocations

VC MUL1

The site is located to the east of the village, adjacent to the existing estate development at Bluebell Road. Overall the settlement is well served by existing facilities and amenities and development in this location will benefit from pedestrian connectivity to all of these. Key services, including Mulbarton Primary School, the GP surgery, local retail outlets and bus stops connecting to Norwich, are located within 1km of the site. The site is located in the south-east corner of a significantly larger agricultural field that lies between The Rosery to the south and Rectory Lane to the north. There are two Public Rights of Way within close proximity of the site – Mulbarton FP10 to the north and Mulbarton FP11 to the south. To the east and south of the site is existing residential development of varying density and form.

Mulbarton Neighbourhood Plan 2015-2030 sets out the community aspirations for new development within the village, including the preferred locations for new development being centred around The Common. Following assessment of all sites submitted for consideration as part of the allocation process it became clear that those sites that may be considered acceptable in accordance with Policy HOU1 of the Mulbarton Neighbourhood Plan (Location of New Residential Development) raised a number of other concerns including heritage, landscape, access and accessibility, and were therefore not suitable for allocation. Whilst VC MUL1 falls outside the area defined as the ‘Heart of the Village’ in the Neighbourhood Plan it relates well to the existing settlement and is considered to acceptable in all other respects.

Development on VC MUL1 will represent a limited break-out to the east of the existing settlement. However, the development will be viewed in the context of the existing residential development to the east along Bluebell Road, as well as the lower density development on the opposite side of The Rosery to the south. As such

the visual impact of VC MUL1 within the wider landscape will be limited particularly with careful consideration given to the boundary treatments and landscaping along key boundaries. At present a significant hedgerow with established trees forms the southern boundary of the site along The Rosery. To maintain the rural character of The Rosery vegetation must be protected and retained as part of any scheme for the site and furthermore should be reinforced as required. Similarly, existing established trees along the western boundary of the site should be retained and protected during the construction phase of development to improve the integration of the site with the existing development.

Vehicular and pedestrian access to the site will be possible from the east via Bluebell Road only. Discussions with the Highways Authority have identified a number of constraints to The Rosery including the carriageway width and the lack of pedestrian connectivity (with limited opportunities to create a suitable pedestrian route) as precluding alternative access points into the site. Furthermore, the quantum of development already served via the existing Bluebell Road restricts the scale of growth that could be achieved in this location to a maximum of 35 dwellings at this time.

An area of 1.5ha of land has been allocated for up to 35 dwellings. This is a site area which is considered reasonable to deliver an appropriately designed scheme that responds sensitively to the existing patterns of development (including the variable densities) and incorporates a landscape scheme that will ease the transition for this edge of settlement site, as well as deliver the standard infrastructure requirements expected.

Policy VC MUL1: Land east of Bluebell Road and north of The Rosery

1.5ha of land is allocated for up to 35 dwellings.

The developer of the site will be required to ensure:

- **Vehicular and pedestrian access to the site is via Bluebell Road only in order to preserve existing highway safety along The Rosery;**
- **The retention, protection and reinforcement of the existing vegetation and trees along the south and west boundaries of the site and the introduction of appropriate boundaries and landscaping to the north and east of the site to reflect the edge of settlement location.**

VC SWA1

The site is located to the east of the B1113 and to the east of existing residential development fronting Norwich Road. It also lies between the carried forward allocation VC SWA2 (formerly SWA1) to the north and a further residential site to the south which is construction at the time of preparing this plan (2014/1642). The site comprises brownfield land formerly occupied by a plant nursery. Redundant greenhouses and a former farm shop remain on the site. Swardeston has some services, including recreation facilities and village hall, and also benefits from the wider range of services and facilities available in Mulbarton. Existing bus stops are to the east and west of the B1113, approximately 260 metres from the site. Bus services frequently connect to Norwich and beyond to the north and Mulbarton to the south. A Public Right of Way (FP6) runs parallel to the east/ south-east boundaries of the site.

The site boundaries of VC SWA1 have been drawn to provide a good its relationship with the permitted and allocated residential sites to the north and south. A contiguous boundary to the east of these sites will contain the development in the wider landscape, minimising the visual impact of the built form whilst also improving the relationship between all three sites. Opportunities to provide pedestrian and vehicular connectivity between the sites should also be explored at the detailed design stage, as should the implications for the overall drainage strategies. Detailed design matters will also need to consider the relationship between these developments, providing a form and layout that compliments the adjacent schemes. Existing vegetation along the site boundaries should be retained and enhanced, particularly the mature trees along the north boundary of the site.

Vehicular access to the site will be via the new access point off the road serving the Bobbins Way development. Some upgrades to the access road may be required, however these details will need to be confirmed with the highways authority as part of the planning application process. An existing continuous footpath links Swardeston with Mulbarton providing pedestrian access between the settlements. The existing footpath is of limited width in some places and some localised off-site highways works may be required to upgrade this link. These details should be agreed with the highways authority at the application stage.

The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan.

An area of 1 ha has been allocated for approximately 20 dwellings. This is considered to be an appropriate scale of development given the recent and planned development in Swardeston, which reflects the surrounding context and makes efficient use of the land whilst also providing adequate space for the standard on-site infrastructure requirements.

Policy VC SWA1: Land off Bobbins Way

1 ha of land is allocated for approximately 20 dwellings.

The developer of the site will be required to ensure that:

- **Vehicular access to the site to be via Bobbins Way;**
- **Retention and protection of the mature trees along the north boundary of the site and the introduction of an appropriate boundary to the east of the site, which contains the site in the landscape and integrates with the rural context;**
- **Detailed design and layout of the site to responds to the adjacent residential developments and maximises opportunities for connectivity between the sites.**

Carried forward allocations

VC SWA2

This allocation from the 2015 Local Plan is carried forward within this document to ensure that development on the site continues to be achievable in an appropriate manner. The site lies to the south-east of the junction between Main Road and Gowthorpe Lane. At the time of preparing this Plan no application had been submitted on the site, however there is ongoing interest in pursuing development.

The site lies immediately north of VC SWA1 and opportunities to deliver connectivity between the sites, as well as a coherent approach to the landscaping of the eastern boundaries of the two sites, should be explored. The site is also in a prominent location at the entrance to the village from the north and the design and layout of the site should reflect this, and take to opportunity to reinforce the existing 30mph speed limit.

The site is identified as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan.

Policy VC SWA2 Land on Main Road

2.7 hectares of land is allocated for approximately 30 dwellings.

The developer of the site is required to ensure the following:

- **A 2.0m wide footway along the site frontage, to enable improved connectivity to the village and to nearby recreational routes, and opportunities are maintained for connectivity between this site and VC SWA1;**
- **Design and layout to reflect the prominent location at the gateway to the village, including opportunities to reinforce the 30mph speed limit;**
- **The Historic Environment Record is consulted to determine any need for archaeological surveys prior to development;**
- **Appropriate boundary treatment to the east of the site, which contains the site in the landscape and integrates it with the rural context; and**
- **Wastewater infrastructure capacity is confirmed prior to development taking place.**

VC BRA1

This allocation from the 2015 Local Plan is carried forward within this document to ensure that development on the site continues to be achievable in an appropriate manner. An application for 23 dwellings on this site has been submitted (2021/2579) however this site lies within an area impacted by nutrient neutrality and as such at the time of preparing this plan the application is pending determination.

The site lies to the east of Norwich Road and south of the village hall. There is no physical feature delineating the southern boundary of the site, which is in line with existing development on Hawkes Lane.

Policy VC BRA1: Land at Norwich Road

0.9 hectares of land is allocated for housing and associated infrastructure for approximately 20 dwellings.

The developer of the site is required to ensure the following:

- **Highway works to include vehicular access from the B1113 only, and the provision of a pedestrian footpath along the full length of the site frontage.**
- **Site layout and design to include frontage development along the B1113 to improve highway safety. The site layout and design must also have regard to the setting of the heritage assets Home Farm (to the south-east) and Thatched Cottage (to the north-east of the site);**
- **A landscaping scheme for the site which reflects the edge of settlement location and includes an appropriate boundary treatment on the southern boundary of the site;**
- **Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development.**

In addition, the developer of the site will be required to investigate the need for the following:

- **Whether there is a requirement to promote an extension to the existing 30mph Traffic Regulation Order;**
- **Opportunities to provide off-site improvements to the existing pedestrian network, including the creation of a pedestrian crossing point near to the junction of School Road and The Street, in liaison with the Highways Authority and the LPA.**

26. Needham, Brockdish, Starston and Wortwell

Form and Character

Needham

Needham is a linear village of mainly detached dwellings on single plot frontage along the former A143. The village is located along the foot of the northern valley slope of the River Waveney. Most development has been concentrated between the village hall and Whitehouse Farm in a linear form.

The northern end of the village has a more open aspect and includes a semi-derelict sunken area of ex-gravel pits. The surrounding area comprises valley slopes rising above the village to the north and characterised by large fields with few hedgerows or trees. To the south, the valley floor has a mixture of arable fields and many mature trees providing an attractive rural setting.

Brockdish

The parish contains Brockdish and Thorpe Abbotts. Brockdish is primarily a linear village located along the northern side of the Waveney Valley close to the A143. The village core is centred on the junction of The Street/Scole Road and Grove Road.

A separate area of residential development is located a short distance to the west near the church. Separation of these two distinct parts of the settlement should be maintained in order to preserve the character of the conservation area with its many listed buildings.

Thorpe Abbotts comprises a small group of mainly detached houses located on frontage plots around the junction of The Street and Mill Road, approx. 2.5 kilometres west of Brockdish. There has been a conservation area designated around Thorpe Abbotts since 1994.

Starston

The parish contains a dispersed form of development which includes a ribbon of development fronting onto The Street. The row extends along the northern slopes of a shallow valley toward the junction with Church Hill, Redenhall Road, Railway Hill and Harleston Road which, combined with the setting of the church and the bridge, forms an attractive focal point. A wide area is defined as a conservation area which

is distinguished by the presence of some notable buildings. The surrounding area is open and affords distant views.

Wortwell

There are two main areas which together form the established village of Wortwell. The main part of the village is along the line of High Road whilst the remainder, known as Low Street, has developed along Low Road. Individual dwellings and farmsteads are dispersed throughout the remainder of the parish. The A143, which bypasses the village, provides good links to Harleston, the A140 and Diss to the west, and to Bungay and the A146 to the east.

Services and Community Facilities

Needham, Brockdish and Wortwell each have a village hall, pub and opportunities for recreation. Needham and Brockdish have a semi-regular bus service to Diss and Beccles. Wortwell shares this service in addition to a daily service to Norwich, Bungay and Yarmouth. Starston has a semi-regular bus service to Norwich and Harleston.

Settlement Limit

Needham

The settlement is constrained to the west by the A143 Bypass and Flood Zones 2 and 3 to the north and east. The Settlement Limit is drawn to provide for some limited infill development within the existing village core. The area of development adjacent to the Harleston bypass roundabout is excluded as it is within the flood zone. The Settlement Limit also excludes the church and village hall and the land opposite as it contributes to the open character and rural appeal of this part of the village.

Brockdish

The Settlement Limit has been drawn to include the main built form of the settlement at Brockdish and allow for some limited sensitive infill within it. A minor addition to the Settlement Limit has been drawn to include a single dwelling that was approved adjacent to the eastern edge of development along The Street (2018/1190).

No Settlement Limit has been defined at Thorpe Abbotts due to the extensive conservation area and its remoteness from services and facilities.

Starston

Due to its dispersed character, attractive valley landscape and extensive conservation area, the Settlement Limit has been drawn to reflect the existing settlement form in three separate parts to prevent further development extending into the surrounding open countryside.

Wortwell

The Settlement Limit has been drawn to include the main built form of the settlement along High Road. Minor extensions to the Settlement Limit have been drawn to include recent development to the south of High Road (2018/2019), as well as an additional parcel of land promoted and assessed as part of the Plan process located immediately north of Wortwell United Reform Church and west of High Road. As a consequence of this extension to the Settlement Limit, existing dwellings adjacent to this site have also been included in the Settlement Limit which now extends to the gap within the built form on High Road.

Site allocations

VC NEE1

The site at Needham is located to the north of the village in close proximity to the High Road/ A143 roundabout. The A143 runs to the north and east of the site, separated from the site by a parcel agricultural land as well as existing residential development. Harman's Lane, a narrow access-only road, runs parallel to the south-west boundary of the site. The site provides an opportunity for linear development along its frontage, in a form similar to the existing pattern of development adjacent to the north-east and south-west of the site. Existing pedestrian footpaths connect the site to the existing facilities and services within Needham and also extend north into Harleston. A Public Right of Way – Needham FP4 – is to the north of the larger agricultural field.

Development in this location will infill an open gap that exists in the streetscene. A linear form of development will be a sympathetic addition to the settlement. Although the site lies within the designated Waveney River Valley it is not connected visually to the River Waveney which lies further to the south. The topography of the site, as well as the existing pockets of woodland and tree belts, will restrict wider views into the site and reduce the wider landscape impact. Consideration will need to be given to the boundary treatments to avoid an urbanising effect. Retention of the existing hedgerow along the site frontage would be preferred but will need to be explored as part of the discussions with the Highways Authority regarding safe vehicular access into the site.

Discussions with the Highways Authority have suggested that development in this location could have a positive impact on traffic speeds, reinforcing the existing 30mph speed limit. Off-site highway works may include improvements to the existing footpath along the site frontage as well as a financial contribution towards a pedestrian refuge point at the roundabout to the north to improve pedestrian connectivity to Harleston.

A surface water flow path has been identified to the north and east of the site but does not significantly extend into the site and does not preclude development of the site. In accordance with the findings of the Stage 2 Strategic Flood Risk Assessment (SFRA) the developer of the site will be required to prepare a site-specific FRA as part of the planning application for the site. This should have regard to the Stage 2 SFRA prepared to support the allocation of VC NEE1, particularly regarding any displacement of water due to flood mitigation measures, surface water storage and discharge rates.

The site currently has no network connectivity the sewer system, therefore early engagement with Anglian Water is recommended regarding the requisitioning of new connection or alternative on-site treatment.

The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan.

The site is allocated for approximately 15 dwellings on an area of 0.9ha, a scale of development that is considered appropriate for the local area whilst also addressing the constraints identified above.

Policy VC NEE1: Land north of High Road and east of Harmans Lane

0.9ha of land is allocated for approximately 15 dwellings.

The developer of the site will be required to ensure:

- **Frontage development with vehicular accesses to High Road only;**
- **On and off-site highway works to include improvements to the existing pedestrian footpath along the site frontage as well as a proportionate financial contribution towards enhancing the existing pedestrian connectivity at the A143/ High Road roundabout to the north-east of the site;**
- **Boundary treatments to reflect the rural context of the site and avoid the introduction of close boarded fences along prominent boundaries;**
- **The Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development;**
- **The preparation of a site-specific Flood Risk Assessment (FRA) and strategy to inform mitigation measures and the layout/development of the site which has regard to the Stage 2 VC Strategic Flood Risk Assessment;**
- **early engagement with Anglian Water regarding the requisitioning of new sewer connection or alternative on-site treatment.**

VC WOR1

The site lies at the western end of Wortwell village, north and south of High Road. The area to the north of High Road adjoins Oak Hill to the east, whilst the area to the south is immediately adjacent to three recently completed self-build properties. Overall, the site is proposed for 12 dwellings, approximately eight to the north of High Road and four to the south.

The scale of development means that the two elements of the allocation are likely to be served by private drives, rather than adopted highways. Both sites have vegetation on the road frontages. To the north this includes a series of oak trees, some of which are covered by Tree Preservation Orders (TPOs), and the layout of, and access to, the site will need to retain those trees covered by TPOs, plus the non-TPO trees as far as is possible. To the south the vegetation screens the site when viewed from the west and maintains a more rural approach to the village; again, access should be designed to retain, reinforce, and/or replace this vegetation.

Due to the rising nature of the land within the river valley, broadly from south to north, the allocation could potentially be prominent in the local landscape and there are some longer distance views towards the Grade I listed St Mary's Church, Redenhall. Therefore, consideration will need to be given to the height of potential dwellings. The sites will need to include boundary treatments that retain the rural approach to Wortwell from the west as well as in any views from footpath Wortwell FP6 (which runs south from The Old School Cottage to Low Road), including additional landscaping which could compensate for the loss of trees not covered by TPOs.

Whilst there is an existing footway on the north side of High Road, this will require widening to current highways standards, and the developer(s) of the site will be required to undertake to work with Norfolk County Council to promote a Traffic Regulation Order for the extension of the existing 30mph speed limit.

Development of the two elements of the site will need to ensure that a policy compliant level of affordable housing is delivered, in accordance with other policies of the Local Plan.

The Stage 2 VC Strategic Flood Risk Assessment (SFRA) identifies potential surface water ponding to the east of the site, north of High Road, as well as surface water flooding on the road frontage of the land to the south of High Road. As such as site-specific Flood Risk Assessment will be required, with consideration given to the key issues identified in the Stage 2 VC SFRA.

Although the site is 0.95ha, the allocation is for 12 dwellings, reflecting the need to protect the trees covered by TPOs, the landscaping requirements and the need to address flood risk issues.

Policy VC WOR1: North and south of High Road

0.95ha of land is allocated for at least 12 dwellings.

The developer of the site will be required to ensure:

- **The two parcels are treated as a single unit, in order to deliver a policy compliant level of affordable housing;**
- **Protection and retention of those trees covered by Tree Preservation Orders (TPOs), north of High Road;**
- **Arboriculture surveys to demonstrate the impact on non-TPO trees and a sensitive landscaping scheme and boundary treatment to reinforce the rural approach to Wortwell from the west, and from footpath Wortwell FP6 to the southwest;**
- **Design and layout, including building heights, to reflect the potential prominence of the site in the River Valley landscape;**
- **Widening of the footway across the site frontage to current Highways standards;**
- **The preparation of a site-specific Flood Risk Assessment (FRA) and strategy to inform mitigation measures and the layout/development of the site, which has regard to the issues identified in the Stage 2 VC Strategic Flood Risk Assessment.**

The developer of the site will also undertake to work with the Highway Authority to promote an extension to the existing 30mph speed limit via the Traffic Regulation Order process.

Carried forward allocations

VC WOR2

Previously called WOR1, this allocation from the 2015 Local Plan is carried forward within this document to ensure that development on the site continues to be achievable in an appropriate manner. This site was actively promoted to the Village Clusters Housing Allocation Plan for an increased number of dwellings and as such the Council is satisfied that the site remains available for development. Due to the substantial highways requirements associated with Major Development (10+ dwellings) in this location, the scale of development set out in this allocation remains the same as in the 2015 Local Plan.

The Stage 2 VC Strategic Flood Risk Assessment (SFRA) identifies a number of factors which need to be taken into account in developing proposals for this site, and

indicates the need for a site-specific FRA, with the resultant strategy informing the layout of the development

Policy VC WOR2: land at the junction of High Road and Low Road

0.4 hectares of land is allocated for housing and associated infrastructure for approximately 5 dwellings.

The developer of the site is required to ensure the following:

- **If vehicular access is proposed from Low Road off-site highway works to include improvements to Low Road and at the Low Road/High Road junction, to ensure highway safety, or alternatively access to be via a private drive from High Road;**
- **The Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development;**
- **A site layout and design that has consideration to the historic grain of the existing settlement that is in closest proximity to the site;**
- **Preparation of a Flood Risk Assessment (FRA) to inform the drainage strategy and site design and layout. The FRA should have regard to the Stage 2 Strategic Flood Risk Assessment prepared as part of the Village Clusters Housing Allocation Plan.**

27. Newton Flotman and Swainsthorpe

Form and character

Newton Flotman

The main settlement lies on the A140 in the Tas Valley, where the boundaries of Saxlingham Thorpe and Newton Flotman parishes meet. Development within the settlement is nucleated, with almost all residential development in the village occurring to the north of the river. The valley side development is visually prominent when approaching from the south-west. Little development has occurred on the east side of the A140 in the attractive valley floor area of the Tas Valley, with the A140 therefore forming a boundary to the main part of the settlement. Much of this eastern area is now included within the enlarged Shotesham Conservation Area. Church Road provides a strong boundary when approached from the north with the church being strikingly prominent.

Swainsthorpe

Development is concentrated between the A140 and the Norwich/London railway line. The settlement is characterised by detached dwellings with the central focus being around the Church and its setting. This is an attractive undeveloped space in the village where development would be inappropriate. Despite recent new development the village has maintained a rural feel which has been achieved by the retention of attractive features such as ponds within the village.

Services and Community Facilities

Newton Flotman has a good range of services and facilities. The main part of the village contains a GP surgery, primary school, village hall, recreation field, residential care home, motorbike salesroom and allotments. There is a restaurant to the south of the village, and local employment at the animal feed mill to the south of the river. The village possesses a good direct link via the A140, to Norwich and Long Stratton and there are regular bus services to Norwich, Long Stratton and Diss. Swainsthorpe also has a pub/restaurant on the A140 and is connected by the same bus routes.

Settlement Limit

Newton Flotman

The Settlement Limit has been drawn to include the main built form of the settlement and include the allocated land, NEW1 made within the 2015 Site Allocations Plan. The village hall, rectory and church are excluded from the Settlement Limit, as is the animal feed mill and all housing on the east of Ipswich Road.

Swainsthorpe

The Settlement Limit has been drawn to include the main built form of the settlement, preventing further extension into the surrounding countryside. Due to the limited services and facilities available, the narrowness of local roads, the boundary has been drawn to allow for only very limited infill.

Site allocations

VC NEW1

The site lies to the southwest of Alan Avenue, and southeast of the 2015 Local Plan allocation. The site is well located for access to the services and facilities within the village, and to public transport on the main A140 corridor.

The site requires two points of access, the first through the carried forward 2015 Local Plan allocation (NEW1) and the second directly from Alan Avenue. Detailed proposals for the 2015 Local Plan allocation received a committee resolution to grant full planning permission for 31 dwellings in May 2022. The layout for the carried forward SWA1 (Application Ref. 2021/2784) includes an access across the northwest corner of this allocation, adjacent to 111 Alan Avenue, and also makes provision for access between the sites along the north-western boundary of this allocation. The site promoters have indicated that a second access can be achieved in the northeast corner of the site. The Highways Authority's preference for the second access to become a continuation of Alan Avenue into the allocation site as the primary route, and the remainder of Alan Avenue (from No. 71) to become the side road off this primary route.

Once development has taken place on the 2015 Local Plan allocation this site will be surrounded by modern housing on three sides and will be visually well contained. The remaining southwestern boundary has limited public viewpoints but would benefit from reinforcement of the existing hedge line to soften the impact of the development and contain it within the wider landscape. Given the proximity of

surrounding residential development, careful consideration will need to be given to the topography of the site, which slopes broadly downwards from north to south.

Potential issues with foul water capacity have been raised and were also identified as part of the planning application process for the carried forward NEW1; consequently, the site may need to be phased beyond the first years of the plan and early engagement with Anglian Water is advised. The site is also identified as being with Groundwater Protection Zone 3, which would not preclude development, but requires early liaison with the Environment Agency regarding the protection of water quality.

Policy VC NEW1: Land off Alan Avenue

1.05ha of land is allocated for approximately 25 dwellings.

The developer of the site will be required to ensure:

- **Two points of access, the first via the adjoining carried forward 2015 Local Plan allocation (now VC NEW2), and the second from another point on Alan Avenue, closer to the junction with Flordon Road;**
- **Reinforcement of the vegetation of the southwestern boundary to successfully contain the site and integrate the development with the wider countryside;**
- **Design and layout to take account of the site topography to protect the residential amenity of existing and future properties;**
- **Liaison with Anglian Water regarding foul water capacity and the potential need to phase the site to later in the plan period;**

Carried forward allocations

VC NEW2

Previously called NEW1, this allocation from the 2015 Local Plan is carried forward within this document to ensure that development on the site continues to be achievable in an appropriate manner. This site is to the south-west of Alan Avenue. The site is adjacent to, and within the same control as, allocation VC NEW1 and where possible opportunities to maximise the connectivity between the sites should be explored via the development management process. A planning application for 31 dwellings has been considered by South Norfolk Council's Development

Management Committee and, at the time of preparing this plan, has a resolution to approve, subject to a being able to address nutrient neutrality (2021/2784).

Policy VC NEW2: Land adjacent Alan Avenue

1.3 hectares of land is allocated for housing and associated infrastructure for approximately 30 dwellings. This site is expected to be built out in accordance with planning application 2021/2784 when approved. Any new planning permission will need to ensure the following:

- **Vehicular and pedestrian access via Alan Avenue;**
- **Landscaping of the site to reflect the edge of settlement location, as well as its elevated position within the wider landscape;**
- **Appropriate boundary treatments along the north-west and south-west site boundaries to minimise the visual impact of the development;**
- **Connectivity of the site with VC NEW1 to be incorporated into the site design including vehicular and pedestrian access between the sites, landscaping, site layout and the drainage scheme, unless otherwise agreed with the LPA;**
- **Liaison with Anglian Water regarding foul water capacity and the potential need to phase the site to later in the plan period;**

28. Pulham Market and Pulham St Mary

Form and character

Pulham Market

Pulham Market is a nucleated village which has developed around an attractive village green. A large number of attractive buildings front the green and are included within a larger conservation area. The village green affords an open aspect for the village centre. There has been considerable development in the second half of the twentieth century to the north and west of the conservation area at Falcon Road, Julians Way, Mill Close and Springfield Walk. In addition, infill development has occurred within the built-up area of the village.

Land around the village is gently rolling and offers distant views across mainly arable land. This gives the village its attractive rural setting. The former route of the B1134 (Tattlepot Road) provides a good link to the A140 linking to Norwich and Long Stratton to the north and Diss to the south. To the west, there is a relatively good link to Harleston.

Pulham St Mary

The main village is located centrally within the parish. It developed in a linear form east-west with development later being located on a north-south axis along North Green Road, Station Road and Mill Lane, and later still, estate development at Goldsmith Way, Bond Close and Chestnut Road. This has resulted in a village with both linear and nucleated features. The ribbon of local authority housing on Norwich Road reinforces the linear form at the western end of the village.

In the centre of the village the grounds of 'The Grange' form a large undeveloped area which adds to the open character of the village, as does the area to the north of The Street around the churchyard. Large parts of the village containing a variety of historic buildings fall within a Conservation Area, which extends to the river meadows south of The Street as far as Dirty Lane. The village has good road access via Starston to Harleston to the east and via Pulham Market to the A140 to Norwich, Long Stratton and Diss to the west.

Services and Community Facilities

Pulham Market has a range of social and community facilities including a surgery, primary school, shop, post office, village hall, pubs and allotments. Pulham St Mary

also has a community hall, shop, post office, residential care home and garage. Both villages are served by a semi-regular bus service to Norwich, Diss, Long Stratton and Harleston.

Settlement Limit

Pulham Market

The Settlement Limit has been drawn to include the main built form of the settlement. There are some opportunities for limited infill within the Settlement Limit.

Pulham St Mary

The Settlement Limit has been drawn to include the main built form of the settlement but to exclude the churchyard and the grounds of The Grange which contribute to the character of the village.

Site allocations

VC PSM1

The site is to the north of Norwich Road and west of the centre of Pulham St Mary. The site is part of a larger agricultural field and as such there is currently no boundary defining the western edge of the allocation. Norwich Road runs parallel to the southern boundary of the site, an area of woodland lies to the north and Poppy's Lane, a sunken rural lane, bounds the east of the site. To the south of Norwich Road is a linear row of semi-detached dwellings with direct access to the highway. Pulham St Mary has a number of local services and facilities, as well as a continuous pedestrian footpath connecting it to Pulham Market which lies to the northeast. Pulham CE Primary School is located approximately 1km from the site in Pulham Market and is accessible by pedestrian footway along the entire route.

The site is in a prominent village location due to its proximity to Norwich Road. Development on this this site will have a visual impact however with appropriate site design and layout the impact is considered to be reasonable. The existing allotments immediately to the east of Poppy's Lane provide a break in the streetscene and an area of open space in the southeast corner of the site will extend this green break, whilst simultaneously also addressing the flood risk issue outlined below. To preserve highway safety the frontage hedgerow along Norwich Road will require partial or complete removal however all protected trees on the site and along the site boundaries will continue to be protected. Appropriate landscaping will be required within the site to compensate for the loss of the hedgerow along Norwich

Road. Development of the site will not have a significant visual impact on the wider landscape due to the presence of existing tree belts and areas of woodland that restrict views towards the site. Views from the footpath network to the south of Norwich Road will be seen in the context of the existing built form and opportunities exist to form an attractive gateway into the village on the approach from Pulham Market.

In terms of access to the site, this can either be via an access off a significantly improved Poppy's Lane between the Poppy's Lane/ Norwich Road junction (which also requires improvement) and Goldsmiths Way, or by the creation of a new priority route through the site, from Norwich Road to Goldsmiths Way, which will reduce existing traffic flow along Poppy's Lane. The former would significantly change the character of Poppy's Lane and create a greater divide between the two green spaces at this junction (existing allotments and new space proposed in the southeast corner of the site). Early engagement with the highways authority is recommended to inform the detailed design of the site. The highways authority has also confirmed a number of highways requirements to ensure the continued safe and free flow of the highway network. These include the provision of frontage development onto Norwich Road with associated vehicular accesses as well as a pedestrian footpath along the site frontage.

Flood map data, as well as discussions with the Lead Local Flood Authority, have confirmed that the southeast corner of the site lies at the head of a surface water flow path with a risk of flooding identified in this area at the 0.1% AEP event. The area at risk of flooding extends onto Poppy's Lane and any highways works associated with the development of the site should seek to improve the current situation. The SFRA Stage 2 assessment for the site concludes that the existing flow paths on the site should be retained and integrated into the site layout and design, with development steered away from the southern boundary and that an area of green infrastructure in the southeast corner of the site would be an appropriate design solution. A site-specific Flood Risk Assessment will be required to inform the layout and design of the site, as well as the detailed drainage strategy, however it is considered that development of the scale proposed is achievable. Furthermore, the detailed drainage strategy for the site may offer opportunities to improve the existing situation outside the boundaries of the site.

An area of 2.83 hectares has been allocated for up to 50 dwellings. This would be an appropriate site area to deliver a scheme of a suitable density, including the

identified area of green infrastructure and standard infrastructure requirements, and facilitate the highways improvements to the local road network.

Policy VC PSM1: Land north of Norwich Road and west of Poppy's Lane

2.83 ha of land is allocated for up to 50 dwellings.

The developer of the site will be required to ensure:

- **Access to the site either via an improved Poppy's Lane and Poppy's Lane/Norwich Road junction or via or a new access road between Norwich Road and Goldsmiths Way;**
- **On- and off-site highways works to include the provision of a pedestrian footpath along the site frontage and road frontage development onto Norwich Road;**
- **A site-specific Flood Risk Assessment (FRA) and strategy to inform the layout/development of the site, including access arrangements. The FRA must have regard to the requirements set out in the Stage 2 VC Strategic Flood Risk Assessment;**
- **An area of open space to be retained in the south east corner of the site to reduce the visual impact of the development and address the identified areas of flood risk;**
- **The retention and ongoing protection of trees subject to Tree Preservation Orders along the north and south boundaries of the site;**
- **An appropriate boundary treatment along the west boundary of the site to lessen the visual impact of the development and integrate with the wider rural landscape.**

29. Rockland St Mary, Hellington and Holverston

Form and character

Rockland St Mary

Development is concentrated along The Street with a small, detached cluster of development at Rockland Staithe to the east of the village, and an isolated group of houses to the west at The Oaks, Bramerton Lane. A small number of individual dwellings and farmsteads are widely dispersed throughout the remainder of the parish. The village has developed a linear settlement form based along Rookery Hill and The Street. It has experienced some limited estate development, particularly at the eastern end of the village adjacent to Surlingham Lane together with some infill development.

The village is set on the Yare Valley, in close proximity to the Broads, with a smaller tributary valley to the south, which together with good views from within the built-up area of the surrounding landscape and the good tree and hedge planting throughout, give the village a pleasant rural character. Most of the parish to the east of the village, including Rockland Staithe, lies within the Broads Authority area. Bramerton Lane / Rockland Road (C202) which meets the A146 at Trowse provides a relatively quick link to Norwich and the A47. Run Lane links to the A146 at Hellington Corner.

Hellington

The parish is very rural in character consisting of a few individual dwellings and farms, with isolated clusters of development at Hellington Corner and Hellington Hill. The A146 runs through the south of the settlement providing a good link to Norwich.

Holverston

The parish is sparsely populated consisting of a few individual dwellings and farms all set in open countryside. The A146 runs through the south of the parish providing a good road link to Norwich.

Services and Community Facilities

Rockland St Mary has a range of social, recreational and community facilities including a primary school, shop, post office, pub, GP surgery village hall and recreation field. Rockland St Mary also has a regular bus service to Norwich. Facilities elsewhere in the cluster are limited, although there are two farm shops in Holverston.

Settlement Limit

Rockland

The Settlement Limit has been drawn to include the main built form of the settlement along The Street, as well as along School Lane and development around Surlingham Lane on Bee-Orchid Way. The boundary is close to but does not adjoin the Broads Authority area.

Holverston and Hellington

There is currently no Settlement Limit in Holverston and Hellington.

Site allocations

VC ROC1

Rockland St Mary is a predominantly linear village, located in close proximity to the Broads National Park. The site lies to the east of the village, in closest proximity to the Broads area, and as such is within the transitional landscape around this sensitive area. Rockland St Mary is served by a number of services and facilities including public house, village hall and separate Parish Room and a local store. Rockland St Mary Primary School is located to the west of the village.

Originally promoted for allocation as two separate parcels of land the site is allocated as a one site in order to maximise the benefits of housing delivery, and as such a single scheme is required with no artificial subdivision of the site.

To the west of the site is Eel Catcher Close, a modest linear development set back from the road frontage. Agricultural land lies to the north and south, with a small cluster of development to the east separated from the site by a parcel of agricultural land. A Public Right of Way (PROW) runs parallel to the east boundary of the site (Rockland St Mary FP3) whilst Rockland St Mary FP2 extends to the north of the site on the opposite side of New Inn Hill. The site is within a sensitive location at a crest in the landscape, requiring careful design and landscaping to contain the visual impact. Furthermore, both PROWs have clear views towards the site and landscaping of the site will need to take into consideration the visual impact of the development from these vantage points. The site layout should take into consideration the existing mature trees adjacent to the east boundary and it will be necessary to protect these trees during the construction phase of development. Developers will be required to submit an appropriate Landscape and Visual Impact Assessment (LVIA) as part of the detailed planning application and site developers

are strongly recommended to liaise with the Broads Authority early in the site planning process in order to ensure appropriate viewpoints are considered at the detailed design stage.

Vehicular access into the site may result in the loss of the mature oak tree on the site frontage. The retention of this tree should be explored as part of the detailed design process. The Highways Authority has confirmed that necessary highway works will include the provision of a footpath along the site frontage, connecting to the short length of footpath alongside Eel Catcher Close and then to the existing footpath provision north of The Street. An opportunity exists to provide a second footpath/cycle connection between the south-west corner of the site and The Street, to the east of Old Hall Barn. This should be incorporated into the site layout to maximise pedestrian/cycle connectivity of the site and should be of appropriate design to reflect its proximity to the designated heritage asset. An informal footpath is currently in evidence across the site, connecting FP3 to the existing pedestrian footpaths in the village and the development of this site should retain that link.

Archaeological finds have been recorded within the local area and may extend closer to the site. Liaison with the Historical Environment Service will be required as part of the planning application process to determine the requirement for further archaeological investigation.

The site is located in an area identified as being within Groundwater Source Protection Zone 3. Site developers will be required to liaise with the Environment Agency to ensure that water quality is not adversely affected however this does not preclude development of the site.

The Minerals and Waste Authority has also identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan.

The site is within the catchment of Whitlingham Water Recycling Centre (WRC) and the in-combination effects with development identified in the GNLP may require phasing of this site beyond the early years of the Plan and early engagement with Anglian Water is recommended.

An area of 1.47ha is allocated for approximately 25 dwellings. This is considered to be an appropriate density to reflect those matters identified above, and in particular the landscape sensitivity of the wider area.

Policy VC ROC1: Land south of New Inn Hill

1.47ha of land is allocated for approximately 25 dwellings.

The developer of the site will be required to ensure that:

- **A Landscape and Visual Impact Appraisal is submitted as part of the detailed planning application to identify the impact of development on the landscape, particularly the Broads Area, and to inform the scale, layout and design of development;**
- **Protection of the mature trees to the east of the site during the construction phase of development;**
- **Appropriate landscaping and boundary treatments along the north, east and south boundaries of the site to minimise the visual impact of the development in the landscape;**
- **On- and off-site highways works to include a pedestrian footway across the site frontage to connect to the existing pedestrian footway to the west of the site, as well as a secondary pedestrian access to the east of Old Hall Barn and providing a linkage to the local footpath network;**
- **Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development;**
- **Early engagement with Anglian Water regarding the need to phase development within the catchment of Whitlingham Water Recycling Centre.**

VC ROC2

The site lies south of The Street, to the rear of the GP Surgery and existing dwellings. The site is close to the main services and facilities in the village, as well as the peak time bus service to Norwich.

Currently there is no direct vehicular access to the site from The Street which in its current form could be used could be used to serve the allocation. Options have been considered by the site promoter and the preferred access uses and upgrade of the existing field access between 24 and 26 The Street. This will require improvement along the length of the access to provide at least a Type 6 road to the Highway Authority's standards, and to create suitable visibility splays within the

Highway Authority's control. These improvements will be sufficient to serve up to 25 dwellings. The Highway Authority also wishes to see improved pedestrian facilities on The Street, between the site access and the footway outside 34 The Street.

Whilst the site extends behind what is principally frontage development on The Street, the effect is partly mitigated by School Lane and St Margaret's Way to the west, which have development in depth, and the long and heavily vegetated gardens of the plots to the east. The site is visually well contained from The Street and by the existing vegetation to the east, but careful consideration will need to be given to the remaining boundaries, which will be to, large, open agricultural fields. Proposals will need to both visually contain the development and integrate the site with the wider countryside, taking into account any views from footpath Rockland St MaryFP4/Hellington FP3 to the south-east. Proposals will also need to protect those tress and hedgerows which border the site, albeit that many are outside the site itself.

The site is identified as being with Groundwater Protection Zone 3, which would not preclude development, but early liaison with the Environment Agency regarding the protection of water quality.

The site is within the catchment of Whitlingham Water Recycling Centre (WRC) and the in-combination effects with development identified in the GNLP may require phasing of this site beyond the early years of the Plan. Similarly, early consultation indicated that there may be sewers crossing the site, and therefore early engagement with Anglian Water is also advised.

Policy VC ROC2: South of The Street

1.33ha of land is allocated for up to 25 dwellings.

The developer of the site will be required to ensure:

- **Access from The Street, suitable for up to 25 dwellings;**
- **Footway connections from the site access to nearby footways on the south side of The Street;**
- **Landscaping which visually contains the site and integrates it with the wider countryside to the south;**
- **Protection of the trees and hedges on the site boundaries, including those outside of the site itself**;

- **Early engagement with Anglian Water regarding the need to phase development within the catchment of Whitlingham Water Recycling Centre.**

30. Roydon

Diss and District Neighbourhood Plan

The Diss and District Neighbourhood Plan covers an area that includes the following settlements that are, or form part of, a South Norfolk Village Cluster: Burston, Shimpling, Diss, Roydon and Scole.

The Diss and District Neighbourhood Plan is being prepared by a steering group working on behalf of Diss Town Council (as the Qualifying Body) and Burston & Shimpling, Roydon, and Scole Parish Councils. The Neighbourhood Plan area also includes Brome & Oakley, Palgrave and Stuston parishes within Mid-Suffolk District. The Neighbourhood Plan was submitted to South Norfolk Council and Mid-Suffolk District Council in July 2022 and was published for consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 between November and December 2022. Once its independent examination is complete the Neighbourhood Plan is expected to be adopted as part of the Development Plan.

The proposed Diss and District Neighbourhood Plan includes site allocations for residential development, based upon housing requirements for different areas as set out in the Greater Norwich Local Plan (GNLP).

A minimum housing requirement of 25 homes for the Burston, Shimpling and Gissing cluster, 25 homes in the Roydon Cluster and 50 homes in the Scole Cluster is identified in this Plan. This reflects the proposed allocation within the submitted Diss and District Neighbourhood Plan. These will contribute to the GNLP requirement for the South Norfolk Village Clusters.

Details of the proposed Diss and District Neighbourhood Plan can be found on South Norfolk Council's website at: www.southnorfolkandbroadland.gov.uk/ddnp.

Further information is also available at the Diss & District Neighbourhood Plan website, here: www.ddnp.info.

Form and character

The main development in the parish is concentrated in three areas. There is the main village of Roydon; an area of settlement around Baynards Green; and parts of

the settlement of Diss to the west of Shelfanger Road and north of Factory Lane, and along Tottington Lane west of Fair Green (both of which are within Diss Settlement Limit and considered with Diss). The parish also contains clusters of development around Brewers Green and part of Bressingham Common along Bressingham Road. Roydon village is located on the A1066 overlooking the Waveney Valley, and comprises several residential estates to the north of the road and a ribbon of development along its south side. To the east, an area of open fields containing an isolated row of dwellings on Factory Lane separates Roydon from the developed area of Diss. Elsewhere, the village is surrounded by open farmland affording attractive views to Snow Street and a shallow valley to the north, and across the larger Waveney Valley to the south. At Baynards Green, development is of a linear nature along Snow Street, Baynards Lane and Hall Lane. These combine to create an attractive environment, where trees are integral to the setting of the dwellings.

The A1066 provides Roydon with a direct east-west link to Diss and other settlements along the Waveney Valley. Old High Road provides a further link to the centre of Diss via Roydon Road. The B1077 Shelfanger Road links northward to Shelfanger and Attleborough.

Services and Community Facilities

The village contains a range of facilities including a primary school, service station, village hall and pub. The village also has space for recreation and a regular bus service to Diss, Norwich, Long Stratton and Bury St Edmunds.

Settlement Limit

The Settlement Limit has been drawn to include the main built form of the settlement and to maintain the separation of the two parts of the village, and that of Roydon and Diss.

31. Saxlingham Nethergate

Form and character

Development within the parish is concentrated at Saxlingham Nethergate with smaller concentrations at Saxlingham Thorpe and Saxlingham Green, and a small cluster of dwellings at West End. The remainder of the parish comprises scattered individual dwellings and farmsteads.

Saxlingham Nethergate has developed from a linear settlement form with development historically taking place along the south side of both The Street and Church Hill. This contrasts with the opposite frontage of The Street and Church Hill which is generally wooded and makes an important contribution to the rural character of the village. Estate development has taken place at Kensington Close, Steward Close and Pitts Hill Close. Church Green is a particularly attractive open space which contributes to the setting of The Old Rectory, the church and The Old Hall, all of which are listed buildings. The importance of this area is reflected by its inclusion in the conservation area, which also includes Church Hill and The Street. The village is set in an attractive valley landscape based on a tributary of the River Tas. The A140 which runs north-south through the western limit of the parish, providing good links from the village to Norwich and Long Stratton.

Services and Community Facilities

The village has a preschool, primary school, village hall, cricket pavilion and community garden. Saxlingham Green also has a residential care home. There is a semi-regular bus service to Norwich and Harleston.

Settlement Limit

The Settlement Limit has been drawn to include the main built form of Saxlingham Nethergate. Dispersed development around Saxlingham Green has not been included.

32. Scole

Diss and District Neighbourhood Plan

The Diss and District Neighbourhood Plan covers an area that includes the following settlements that are, or form part of, a South Norfolk Village Cluster: Burston, Shimpling, Diss, Roydon and Scole.

The Diss and District Neighbourhood Plan is being prepared by a steering group working on behalf of Diss Town Council (as the Qualifying Body) and Burston & Shimpling, Roydon, and Scole Parish Councils. The Neighbourhood Plan area also includes Brome & Oakley, Palgrave and Stuston parishes within Mid-Suffolk District. The Neighbourhood Plan was submitted to South Norfolk Council and Mid-Suffolk District Council in July 2022 and was published for consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 between November and December 2022. Once its independent examination is complete the Neighbourhood Plan is expected to be adopted as part of the Development Plan.

The proposed Diss and District Neighbourhood Plan includes site allocations for residential development, based upon housing requirements for different areas as set out in the Greater Norwich Local Plan (GNLP).

A minimum housing requirement of 25 homes for the Burston, Shimpling and Gissing cluster, 25 homes in the Roydon Cluster and 50 homes in the Scole Cluster is identified in this Plan. This reflects the proposed allocation within the submitted Diss and District Neighbourhood Plan. These will contribute to the GNLP requirement for the South Norfolk Village Clusters.

Details of the proposed Diss and District Neighbourhood Plan can be found on South Norfolk Council's website at: www.southnorfolkandbroadland.gov.uk/ddnp.

Further information is also available at the Diss & District Neighbourhood Plan website, here: www.ddnp.info.

Form and character

The village is located partly on the edge of the Waveney Valley. The village is centred around the junction of the former routes of the A140 and A143. The village

contains extensive frontage development to the north and east of this junction backed by several large housing estates. Relatively little development is located on the western side of the former A140, except for some limited frontage development along The Street and a small housing estate to the south of Diss Road. The area around the junction forms the village core and includes a variety of buildings of considerable historical significance.

Approximately half of the village consists of relatively modern dwellings of which many are detached, and the village is characterised by several open spaces near the centre, some of which afford views over the surrounding countryside. The A140 and A143, which both bypass the village, provide direct links to Norwich and Ipswich and to towns along the Waveney Valley. The A1066 to the west of the village links Scole to Diss, with Diss railway station around 2.5km from the village.

Services and Community Facilities

Scole has a range of social and community facilities including a primary school, village hall recreation field and pub. There is a semi-regular bus service to Diss, Norwich, Beccles and Long Stratton.

Settlement Limit

The Settlement Limit has been drawn to include the main built form of the settlement and to protect the setting of the Conservation Area around the village centre and church from inappropriate development to the west. The boundary includes a residential allocation proposed to be carried forward in the Diss & District Neighbourhood Plan, located behind the affordable housing scheme at Flowerdew Meadow opposite the school. The Settlement Limit has been updated to incorporate recent development west of Norwich Road at Kings Close (2016/0165).

33. Seething and Mundham

Form and Character

Seething

The village of Seething has developed a linear form along Seething Street. It is characterised by predominantly one plot depth development. The abundance of tree and hedge planting especially along road frontages, together with the large open grounds of the church, and the undeveloped frontage of The Street east of the Church affording good views of the surrounding open countryside, all contribute to the rural setting of the village. This is recognised by its designation as a conservation area.

A particularly attractive feature of the village is the large pond and adjacent woodland area which are an integral part of the setting of Mere House and White Lodge, both listed buildings. To the north-east of the main built-up area is a ribbon of development comprising council housing set in open countryside. The north and north-west of the parish comprises attractive valley landscape which contributes towards the rural setting of the village. Road links exist via Brooke Road (C203) and the B1332 to the west, and to Loddon and the A146 to the east.

Mundham

The parish has a very dispersed settlement pattern of individual dwellings and farms, isolated clusters of development at the London Road/Mundham Road junction and at Mundham Common Road. The remainder of the parish is predominately agricultural.

Services and Community Facilities

Seething has a range of social, recreational and community facilities including a primary school, shop, post office and village hall. Both villages are served by a limited bus service to Norwich and Loddon.

Settlement Limit

Seething

The Settlement Limit has been drawn to include the main built areas of the settlement. It is split into three parts to exclude the area around the ponds in order to preserve the rural character of the village. The existing southern-most Settlement Limit has been extended westwards to include the linear development to the west of

Seething Road, incorporating the two new dwellings approved under planning permission 2018/1033, as well as two further sites promoted and assessed through the Plan process. A new length of Settlement Limit has also been drawn around existing linear development on Mill Lane to the north of the settlement.

Site allocations

VC SEE1

The site lies to the west of Mill Lane, north of the existing linear development, which runs south to the junction with Brooke Road.

The existing development is frontage only and relatively consistent in form and density, being predominantly two-story semi-detached dwellings, set back from the road frontage by gardens and parking. The site will also be developed as frontage housing, in keeping with this existing pattern. The site is well screened by existing vegetation to the west, but the northern boundary is open to the adjoining agricultural field; public views are likely to be minimal, but landscaping would be desirable to contain the development in the wider rural landscape.

The site is less than 1km from the local services and facilities in the village, as well as the bus stops on the route that currently serves Norwich City Centre. Whilst there are no footways on Mill Lane, much of the road has wide verges and there is good visibility. The Highway Authority has indicated that a footway along the site frontage will be necessary, although this could be less formal in nature to reflect the character of the area, along with local carriageway widening.

The site is identified as being underlain by safeguarded sand and gravel resources, consequently any development will need to comply with the relevant policies of the Minerals and Waste Local Plan at the time of any application.

The site is adjacent to a Water Recycling Centre (WRC), and Anglian Water has identified that there are sewers crossing the site, both of which will need to be taken into account as part of the development layout. In addition, the WCS is small and consequently development of SEE1 may have a disproportionate impact on the WRC, requiring upgrades.

The Village Clusters Strategic Flood Risk Assessment (SFRA) identifies that development sites should not increase runoff and contribute to the existing known surface water issues.

Policy VC SEE1: West of Mill Lane

0.53ha of land is allocated for at least 12 dwellings.

The developer of the site will be required to ensure:

- **Development is set out as frontage housing, in keeping with the form and character of Mill Lane;**
- **A footway, suitable for the rural location, and carriageway widening will be required across the front of the site;**
- **Protection of mature trees adjoining the site and landscaping of the northern boundary to contain the site in the wider landscape**;
- **Early engagement with Anglian Water regarding their infrastructure on and adjoining the site and capacity of the Water Recycling Centre**.

34. Spooner Row and Suton

Form and character

The village has developed as four significant settlement groupings, with the Norwich to Ely railway line and agricultural land separating the groups. The open spaces between these settlement groups contribute to the character of the village. To the north-east, across the A11, is Suton which is a small hamlet. There are minor road connections to the A11 providing access to Attleborough, Wymondham and Norwich.

Services and Community Facilities

The village hall, rail halt and primary school are in the School Lane/Station Road cluster, while there is a pub on the crossroads to the east. Suton has preschool facilities. Spooner Row has a railway station with one train a day to Norwich and Cambridge. There is also a regular bus service to Norwich, Wymondham and Attleborough, although these only stop on the B1172 across the A11 and several hundred meters from the village proper.

Settlement Limit

The Settlement Limit has been drawn to include the main built form of the settlement but excludes the school playing field. As such, it appears in clusters, reflecting the dispersed nature of Spooner Row. No Settlement Limit is defined for Suton.

Site allocations

VC SPO1

The site lies to the west of Bunwell Road, opposite a residential development under construction at the time of preparing this plan. Linear development characterises much of the existing development within the village with notable exceptions including the new development east of Bunwell Road. Spooner Row comprises a number of distinct areas of development separated by modest parcels of agricultural land. The site forms part of a larger agricultural field to the south east of the main settlement.

The site is located in the south east corner of the agricultural field, along the road frontage and adjacent to the boundary with residential dwellings to the south. Development of this site will reduce the existing undeveloped gap between The Orchards and the Queen's Street/Bunwell Road junction, however linear

development will complement the traditional built form in evidence in the village, whilst continuing to retain some separation between the different clusters of development. In combination with the development on the opposite side of Bunwell Road, the site marks a transition between the village and the rural surroundings. As such a modest level of development is allocated in this location to limit the visual impact in the wider landscape setting. For the same reason appropriate boundary treatments will be required along the newly created site boundaries, as well as the protection and enhancement of the existing boundary with properties to the south.

To maintain and protect highway safety a number of on- and off-site highways works have been identified. These include improvements to both the existing carriageway and the pedestrian frontage footpath between the site and Station Road, as appropriate, and a review of the existing speed limit along the site frontage.

To the north of the site, and within the same parcel of agricultural land, an extensive area is identified as being within floodzones 2 and 3a. An active surface water flowpath has also been identified north of VC SPO1. The allocation does not extend into these identified areas and the Lead Local Flood Authority has confirmed that, with an appropriate drainage strategy, development of the site is acceptable. Opportunities to improve the existing flood risk as part of the site layout and design should be sought as part of development of the site.

The impact of VC SPO1 on the identified heritage asset to the south of the site, The Orchards, has been assessed via the supporting Heritage Impact Assessment. Development of the site is not considered to result in harm to the significance of the setting of the listed building however reinforcement of the existing boundary vegetation will also provide further protection of this heritage asset. Archaeological records exist for land south of Bunwell Road therefore consultation with the Historic Environment Record will be required to determine the need for surveys prior to development.

Spooner Row Water Recycling Centre (WRC) is small and consequently development of SPO1 may have a disproportionate impact on the WRC, requiring upgrades, therefore early engagement with Anglian Water is recommended.

An area of 0.76ha is allocated for approximately 15 dwellings in this location. This is considered to result in an efficient use of land whilst avoiding areas of identified flood risk within the wider area and limiting the visual impact of development on the approach into the settlement.

Policy VC SPO1: Land west of Bunwell Road

0.76ha of land is allocated for approximately 15 dwellings.

The developer of the site will be required to ensure that:

- **Linear frontage development only to reflect the existing pattern of development in Spooner Row;**
- **Appropriate landscaping of the north and west boundaries, to contain the development and integrate it with the wider countryside, and the protection and enhancement of the existing vegetation along the south west boundary;**
- **A site-specific Flood Risk Assessment (FRA) and strategy, to inform the layout of the site, which has regard to the requirements of the Stage 2 VC Strategic Flood Risk Assessment;**
- **Highway works to include improvements to the existing carriageway as well as the pedestrian footway between the site and Station Road;**
- **Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development**

VC SPO2

The site is located to the south of Station Road, immediately opposite Spooner Row Primary School. The main area of the settlement is to the east of the site. Spooner Row comprises a number of distinct areas of development, separated by modest parcels of agricultural land. A linear pattern of development characterises much of the existing built form although there are also some small clusters of housing, most notably along Bunwell Road as well as current development site opposite VC SPO2. The frontage of VC SPO2 has a planning history that includes a previous permission for residential development that has expired.

Originally promoted for allocation as two separate parcels of land, the site is a single allocation in order to maximise the benefits of housing delivery, and as such a single scheme is required with no artificial subdivision of the site.

Frontage development of the site along Station Road will reflect the existing linear development in Spooner Row, whilst the larger area to the rear of the frontage provides an opportunity for a more comprehensive development. The site will be viewed against the backdrop of the existing development along Station Road, as well as the new dwellings under construction at the time of preparing this plan; however,

it will also reinforce the transition between the settlement and the rural surroundings. Appropriate landscaping of the site boundaries will be required to mitigate the visual impact of the site development, particularly along the southern boundary, whilst the protection and enhancement of the existing landscaping on the eastern and western boundaries will also provide mitigation of the visual impact.

Vehicular access to the site will be via Station Road only. In order to secure adequate visibility splays it will be necessary to remove some or all of the existing established hedgerow and mature trees along the site frontage. Where possible retention of the existing landscaping should be a priority, however replacement landscaping should be incorporated into the site layout and design if this is not possible. An area of potential traditional orchard priority habitat has been identified as lying adjacent to the western boundary of the site and opportunities to enhance this area could be considered as part development of this site, securing additional biodiversity gain.

To preserve and maintain highway safety, highway works associated with the development of this site will include the provision of a footway across the site frontage to connect to both the existing footpath provision in the village and enable safe pedestrian access to Spooner Row Primary School.

An area of surface water flooding has been identified along the site frontage and within part of the site boundaries. This is not considered to preclude development of the site and the Lead Local Flood Authority has confirmed that a reasonable drainage solution is achievable to address this issue.

Spooner Row Water Recycling Centre (WRC) is small and consequently development of SPO2 may have a disproportionate impact on the WRC, requiring upgrades, therefore early engagement with Anglian Water is recommended.

The site is allocated on an area of 1.67ha and is allocated for approximately 25 dwellings, reflecting the gateway location of the site and the need to address flood risk issues.

Policy VC SPO2: South of Station Road

1.67ha of land is allocated for approximately 25 dwellings.

The developer of the site will be required to ensure that:

- **Access from Station Road only with off-site highways works to include a pedestrian footpath along the site frontage and a crossing point to connect to Spooner Row Primary School;**
- **Protection and enhancement of the trees and hedgerows on the east and west site boundaries and an appropriate boundary to the south of the site, which both contains the site and integrates it with the wider rural landscape;**
- **Site layout and design to include linear development facing the Station Road frontage.**

Carried forward allocations

VC SPO3

Previously called SPO1, this allocation from the 2015 Local Plan is carried forward within this document to ensure that development on the site continues to be achievable in an appropriate manner. Since 2015 the site has been subject to a number of planning applications with subsequent amendments also granted planning consent. The site continues to benefit from planning permission for 7 dwellings (2016/0627) and a CIL payment has been made following the commencement of the site.

This site lies to the north of the playing field, opposite existing housing and consolidates one of the existing development boundary clusters.

Policy VC SPO 3: Land at School Lane

0.3 hectares of land is allocated for up to 7 dwellings. This site is expected to be built out in accordance with the existing planning permission (2016/0627). Any new planning permission will need to ensure the following:

- **Off-site highway works to include improvements to the provision for pedestrian safety in the immediate area of the development site, details of which to be agreed with the Highways Authority and the LPA;**
- **Protection of the existing protected tree (subject to a Tree Preservation Order) on the east of School Lane during the construction phase of development;**
- **Retention, protection and reinforcement of the existing established hedgerow and tree boundaries along the south and east boundaries of the site wherever possible;**
- **Appropriate boundary treatments to the north and east boundaries to reflect the rural context of the site.**

VC SPO4

Previously called SPO1, this allocation from the 2015 Local Plan is carried forward within this document to ensure that development on the site continues to be achievable in an appropriate manner. This site sits opposite and adjacent to existing housing on Chapel Road, and consolidates one of the existing clusters of dwellings that make up Spooner Row.

The site has been subject to several planning applications, as part of linked permissions for development south of the village, east of Bunwell Road. At the time of preparing the this Plan the site has permission for 14 units. However, whilst development east of Bunwell Road has commenced, development on VC SPO4 has not started and a constraint has been identified in terms of an underground gas pipeline at a shallow depth on the site frontage, which has delayed implementation. The Chapel Lane part of the linked planning permissions accommodates all of the affordable housing for the combined 39 units, and this is reflected in Policy VC SPO4

Policy VC SPO4: Land at Chapel Road

0.6 hectares of land is allocated for up to 14 dwellings. This site is expected to be built out in accordance with the existing planning permissions (2014/2472, 2016/2424 & 2018/1622). Any new planning permission will need to ensure the following:

- **Sufficient affordable housing to meet the Local Plan policy requirements for the combined Chapel Lane and east of Bunwell Road sites;**
- **The northern edge of the site should be landscaped to lessen the visual impact when approaching the village along the Wymondham Road;**
- **Advice is sought from the appropriate water authority regarding the need for relocation of the existing nearby sewage pumping station, to facilitate maintenance.**

35. Stoke Holy Cross, Shotesham and Caistor St Edmund & Bixley

Form and character

Stoke Holy Cross

Within the parish of Stoke Holy Cross there are two main areas of settlement, the main village lying either side of the C201 road connecting Norwich and Hempnall in the west of the parish, and the settlement of Upper Stoke which lies on its eastern boundary. This latter area forms part of the settlement of Poringland and is covered by the Poringland Settlement Limit defined through the Greater Norwich Local Plan (GNLP).

Historically the village developed around the mill which forms the principal building in the small conservation area. The village has traditionally had a strongly linear form which developed along the eastern banks of the River Tas away from the older historic part of the settlement around the mill. More recent estate development has taken place on the eastern side of Norwich Road where the village has grown up the slope of the valley.

The C201 provides a direct link from the village to Norwich.

Shotesham

Development within the parish has been concentrated along the Street to form the established village of Shotesham. The village has developed a linear settlement form with one plot depth only. The whole village is set within an attractive valley landscape with a particular feature being the abundance of trees and hedges which fill the significant gaps that separate many of the buildings and therefore are important in maintaining the rural character of the village.

The main built-up area together with part of Shotesham Common is a conservation area, designated since 1973. This was extended in 1994 to include the attractive landscape to the west associated with Shotesham Hall.

Caistor St Edmund and Bixley

Caistor St Edmund is situated in the Tas Valley and is the site of the remains of a Roman market town. Development within the parish is sparsely populated with development concentrated along Stoke Road and Caistor Lane and the remainder of the parish displaying a dispersed settlement pattern of individual dwellings. The

parish is located close to the A140 and A47 allows good access to Norwich and further afield.

Bixley is predominately rural in nature with isolated dwellings. The B1332 allows good access to the south towards Poringland, but also to the north to A146 and A47.

Services and Community Facilities

Stoke Holy Cross possesses a range of facilities, including a primary school and a preschool, village hall, recreation facilities, village shop, two restaurants and a takeaway. Arminghall village hall is located in Bixley parish, and Shotesham has a pub. Shotesham has a semi-regular bus service to Norwich and Harleston. Stoke Holy Cross, Caistor St Edmund and Bixley share this service but also have more regular buses to Norwich, Bungay and Poringland.

Settlement Limit

Stoke Holy Cross

The Settlement Limit has been drawn to include the main built form of the settlement and recent new housing development. The boundary allows for additional infill development on Long Lane and elsewhere in the village but has been drawn to protect the more rural character of the village in the southern and northern extremities of development along Norwich Road.

Shotesham

Due to the limited services available and the attractive valley landscape the Settlement Limit has been drawn around the existing built up area to prevent further ribbon development extending into the surrounding countryside. The area from the walled frontage of Shotesham House and the Old Barn southwards along The street has been excluded from the Settlement Limit because of the importance this area has in contributing towards the form of the village. Any proposals for new development within the boundary must take account of the character of the well-established conservation area and positively enhance it.

Site allocations

VC STO1

The site is located to the north-east of the village, is adjacent to a recent development at Harrold Place and mirrors the eastern edge of the development off Broomefield Road, on the opposite side of Long Lane. Development on the site will be viewed in the context of these recent developments. The site benefits from good connections to the services and facilities available within Stoke Holy Cross, including via the existing pedestrian footpaths. Stoke Holy Cross Primary School has recently benefitted from an expansion of its site area following recent residential development in the village.

The Highway Authority has confirmed that most of the development will be served from the existing Harrold Place access, plus some frontage development onto Long Lane. The recently completed access at Harrold Place will require widening and some recent planting may need to be removed to facilitate this. The element of frontage development onto Long Lane is preferred to reinforce the existing 30mph speed limit and the existing footpath provision will require extending along the site frontage.

The site is located to the south of the Tas Valley River Valley, with a small area of the site extending into this landscape designation. The visual impact arising from this site will be reduced by being seen against the backdrop of the existing settlement, particularly the adjacent scheme and housing along Long Lane. Development at Harrold Place successfully integrates into the surrounding landscape and as such development on this site should reflect the form and scale of the adjoining scheme. To minimise the visual impact of the development on the approach from the east along Long Lane, dwellings should be restricted to 1 and 1.5 storey in height, unless supporting evidence at the time of the planning application confirms that 2 storey development is acceptable. The existing eastern boundary, including the established trees, will require protection and enhancement to mitigate the visual impact arising from the development. Landscaping will also be required along the northern boundary of the site to soften the visual impact of the development in longer views towards the site from the north and west, including those across the River Valley.

The site is allocated for up to 25 dwellings on a site area of 1.42ha, a scale of development which is considered to be acceptable reflecting the landscape sensitivities of the site and the density of the adjoining development at Harrold Place.

Policy VC STO1: Land north of Long Lane

1.42ha of land is allocated for up to 25 dwellings.

The development of the site will be required to ensure:

- **The continued safe and free flow of the local highway network, with the majority of dwellings served from the existing Harrold Place access, plus frontage development onto Long Lane, and the extension of the existing pedestrian footpath along the site frontage;**
- **Protection and enhancement of the existing Priority Habitat, including the established trees, along the eastern boundary of the site to minimise the visual impact of the development from Long Lane;**
- **Establishment of landscaping along the northern boundary of the site to minimise the visual impact of development in views across the River Valley;**
- **Development is limited to 1 and 1.5 storey in height along the eastern boundary and in the north-east corner of the site to minimise the visual impact of the development and the impacts on residential amenity**.

36. Surlingham, Bramerton and Kirby Bedon

Form and character

Surlingham

Surlingham has a linear character with no significant estate development. It comprises ribbons of continuous single plot depth development principally along The Street, The Green and Walnut Hill with off-shoots from these roads along New Road and Mill Road. Detached from this main group is Ferry Corner to the north, and Church Corner. The village retains a very rural character and is adjacent to the Broads, with much of the parish's northern half lying within the Broads Authority area

The settlement is linked to the Norwich Area by the C202 which links via Bramerton to the A146 at Trowse close to its junction with the A47 Norwich Southern By-pass and provides good accessibility to the wider Norwich area.

Bramerton

Within the parish of Bramerton there are a number of groups of development; the main village running north to south along Framingham Lane and The Street; the development between, and on, Hill House Road and Mill Hill including that which overlooks the River Yare; and small developed frontages isolated from the main village on Surlingham Lane and Cory's Close.

The majority of the main settlement within the parish is a conservation area containing a number of listed buildings and important spaces within the settlement including the wooded parkland setting of Bramerton Hall. Bramerton is also in close proximity to the Broads, with the northern fringe of the parish within the Broads Authority area

Kirby Bedon

Kirby Bedon is a sparsely populated parish. It consists mainly of individual dwellings and farms, many with farm buildings associated and clusters of dwellings set in open countryside. Kirby Bedon is also in close proximity to the Broads, with the northern fringe of the parish within the Broads Authority area.

Services and Community Facilities

Surlingham has a primary school and Bramerton has a village hall and recreation facilities. In addition, there are two pubs on the bank of the river Yare. All three villages are connected by a regular bus service to Norwich.

Settlement Limit

Surlingham

The Settlement Limit has been drawn to protect the rural nature of the settlement and the existing pattern of linear development.

Bramerton

The Settlement Limit has been drawn to include the main built form of the settlement along the Street and includes the former employment site at Church Farm which is now residential.

37. Tacolneston and Forncett End

Form and character

The main concentration of development within the parish of Tacolneston is based along Norwich Road and adjoins the built-up area of Forncett End to the south. Development in the remainder of the parish comprises scattered individual dwellings and farmsteads. The village developed as a predominantly linear settlement along Norwich Road with the addition of post war estate development, namely at Dovedale Road, Boileau Avenue and off Bentley Road in Forncett End.

Further estate development exists at The Fields to the west of Norwich Road. A significant break in the built-up frontage on both sides of Norwich Road exists to the north of the Manor House buildings whose setting in spacious grounds with good tree growth contributes towards the 'open' nature and rural character of this part of the village. The area to the north of the estate development at Dovedale Road is designated as a Conservation Area, which extends as far east as the church. This area has a distinctly rural character with mature trees.

In Forncett End a ribbon of development has extended along Long Stratton Road to the east with development limited to the north side of the road east of Chestnut Tree Farm with the southern side largely undeveloped and fronting open fields. Development has also extended along the south side of West Road and along both sides of Tabernacle Lane as far as Elm Tree Farm.

The B1113 provides relatively good access to Norwich and New Buckenham whilst the B1135 runs to the north providing access to Wymondham and Long Stratton. The remainder of the parish is served by 'C' class and unclassified roads.

Services and Community Facilities

The parish has a range of social and community facilities including a primary school, pub, takeaway restaurant, village hall and recreation facilities. There is a limited bus service to Norwich, Diss, Wymondham, Wreningham and East Harling.

Settlement Limit

Tacolneston has two separate areas contained within settlement limits. A Settlement Limit has been drawn to include the main built form of the settlement whilst a smaller

Settlement Limit has been drawn around the estate development at Dovedale Road to the north of the village.

Site allocations

VC TAC1

The site lies to the west of Norwich Road, in front of an existing bungalow as well as the agricultural buildings associated with Hill Top Farm. To the north of the site, separated by existing residential development, is Tacolneston Conservation Area which extends north along the B1113. On the opposite side of the B1113 is the Dovedale Road development comprising single and 1.5 storey dwellings whilst to the south of the site is a parcel of agricultural land which forms a gap in the built form of the settlement.

The site has a strong relationship with the existing services and facilities within the village, being located within 200 metres of the village primary school and approximately 550 metres from the recreational facilities and village hall. A continuous footpath, on the opposite side of Norwich Road, connects the site to these amenities as well as the rest of the settlement.

A green gap separates Tacolneston into two clusters of development, north and south along the B1113. Whilst VC TAC1 will have an impact on the open, semi-rural, character created by this gap it relates well to the existing built form to the north of the village, particularly the development at Dovedale Road, as well as the existing agricultural buildings to the west and the planning permission for 3 dwellings along the site frontage (2016/2635). With appropriate design and landscaping, and viewed in the context of the existing developments, this site will not have a significant impact on the wider landscape setting.

A network of off-site ponds exists in proximity to the site development of the site should ensure ongoing connectivity between these ecological features. Similarly, appropriate measures will need to be taken to ensure the continued protection of the protected horse chestnut tree on the site frontage, adjacent to the existing farm access.

The existing farm access is proposed to be upgraded to create the new vehicular access to the site and some highways works have been identified as being appropriate to preserve existing highway safety. These measures include the provision of a pedestrian footpath extending along the site frontage, as well as the

delivery of a highway crossing to connect the site to the existing footpath on the opposite side of the road thereby creating a safe pedestrian route to Tacolneston CE Primary Academy.

There is currently limited capacity at the receiving Water Recycling Centre (Forncett End) and early engagement with Anglian Water is recommended regarding the potential need to phase of the site beyond the earlier years of the Plan.

A site area of 0.6ha has been allocated for up to 25 dwellings. A concept drawing has been provided illustrating that this number of homes could be accommodated on the site however this layout comprises a high number of one- and two-bedroom dwellings. Whilst this does not accord with the current housing mix as set out in the Greater Norwich Strategic Housing Market Assessment (SHMA), a regular criticism of smaller village sites is that there is often a high proportion of larger dwellings at the expense of smaller, entry level, dwellings. As such, this site could help addres this concern. However, should an alternative housing mix be necessary this may reduce the number of dwellings that can be achieved on the site.

Policy VC TAC1: Land to the west of Norwich Road

0.6ha is allocated for up to 25 dwellings.

The development of the site will be required to ensure:

- **Highway works to include the provision of a frontage footpath and the creation of a crossing point across the B1113 to connect to the existing pedestrian footpaths, and provide a safe route to school;**
- **Retention and protection of the horse chestnut tree on the site frontage which is subject to an existing Tree Preservation Order;**
- **Appropriate boundary treatments to the south of the site minimise the landscape impact of the development.**
- **Early engagement with Anglian Water (AW) to determine the capacity of the receiving Water Recycling Centre (WRC), and the consequent potential need to phase the site until capacity is available.**

Carried forward allocations

VC TAC2

Previously called TAC1, this allocation from the 2015 Local Plan is carried forward within this document to ensure that development on the site continues to be achievable in an appropriate manner. The site is located off a cul-de-sac called the Fields which is accessed from the B1113 Norwich Road. At the time of preparing this plan the site benefits from outline planning permission (2017/0225) and the Council is in receipt of an associated Reserved Matters application (2021/2572) as well as applications to discharge a number of planning conditions. However, the site lies within an area impacted by nutrient neutrality and as such these applications currently remained undetermined at the time.

Policy VC TAC2: Land adjacent The Fields

0.95 hectares of land is allocated for housing and associated infrastructure for approximately 21 dwellings. This site is expected to be built out in accordance with the existing planning permission (2017/0225). Any new planning permission, other than the approval of reserved matters applications in line with the existing outline, will need to ensure the following:

- **Vehicular access from The Fields only;**
- **Site layout and design to minimise the impact on the residential amenities of existing and future residents;**
- **Highway improvement works to include promotion of a 20mph Traffic Regulation Order at The Fields as well as improvements to the existing pedestrian footpath provision between the site and the existing bus stop on Norwich Road (at The Jolly Farmers, Forncett End) unless otherwise agreed with the LPA;**
- **Appropriate boundary treatments along the north-west and south-west boundaries of the site to reflect the rural context of the site and the edge of settlement location;**
- **Protection and retention of the existing established trees along the site boundaries;**
- **Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development.**
- **Early engagement with Anglian Water (AW) to determine the capacity of the receiving Water Recycling Centre (WRC), and the consequent potential need to phase the site until capacity is available.**

38. Tasburgh

Form and character

There are two main areas of settlement in the parish, Upper and Lower Tasburgh. Upper Tasburgh has developed as a nucleated settlement as a result of post-war estate development and lies above the Tas Valley which runs to the south and west. Lower Tasburgh is set in the Tas Valley and comprises an older ribbon of development strung along part of Grove Lane and Low Road. With the exception of a small estate at Harvey Close the character of Lower Tasburgh comprises single plot depth development of varying age with significant trees and hedges interspersed with important gaps that give it an attractive rural character. Upper Tasburgh has a good access onto the A140 linking Norwich and Ipswich and on which there are frequent bus services. Lower Tasburgh's links to this road are by minor roads, some of which are very narrow.

Services and Community Facilities

There is a range of facilities including a village hall, recreation facilities, restaurant and primary school. Tasburgh has a regular bus service to Norwich, Long Stratton and Diss.

Settlement Limit

The Settlement Limit is fragmented. In Upper Tasburgh the Settlement Limit incorporates the main built-up area. The existing Settlement Limit in Lower Tasburgh has been restricted to development that is best located to access the available services. A small extension to the Settlement Limit in Lower Tasburgh has been drawn to incorporate the four dwellings approved by planning permission 2018/0290, as well as the adjacent existing properties. The revised Settlement Limit extends to (but excludes) the wildlife amenity area.

Site allocations

VC TAS1

This site was previously allocated in the 2015 South Norfolk Site Specific Allocations and Policies Document for approximately 20 dwellings. The site was promoted again for the Village Clusters Housing Allocations Plan for a potential increase in

numbers. Subsequently a planning application for 35 dwellings was submitted but refused. Within this Plan an uplift of approximately 5 dwellings is allocated. The site is well located for the primary school, village hall and recreation ground, as well as main bus services between Norwich and Long Stratton on the A140.

The site comprises land immediately to the north-west of the existing built-up area of Tasburgh, between the main part of the village and a small area of development around Old Hall Farm further to the north-west. The site also immediately adjoins the school, to the east.

The site is open to the Church Road frontage but is otherwise well contained by existing development and vegetation. Development should protect the existing mature vegetation at the northern end of the site and enhance the planting on the eastern and western boundaries.

The site will require a principal access from Church Road, which will itself need to be widened across the site frontage to 5.5m with a 2.0m frontage footway to link with existing provision. The Highway Authority also requires an access from Henry Preston Road, with a continuous road link between the two accesses.

The site adjoins the Preston VC CE Primary School, which is currently on a constrained site of approximately 0.76ha. The 2015 Local Plan policy required the provision of land for potential future expansion of the school, which would otherwise be landlocked by the development. Expansion to a 2-form entry primary school would require approximately 0.46ha of land, which may unduly restrict the number of dwellings that could be achieved on site. Consideration should, however continue to be given to the longer term need to allow for proportionate expansion of the school.

The Heritage Impact Assessment that supports this plan identifies three listed buildings in the vicinity, plus the Tasburgh Enclosure Scheduled Ancient Monument opposite. The nearest listed building is Old Hall Farmhouse to the northwest of the site, which has an access along the allocation boundary. Whilst the front elevation of the house faces the site, the wider setting is contained in its extensive grounds and there are intervening buildings between the farmhouse and the site. Notwithstanding this, the layout of the site and the use of landscaping will need to respect and protect the wider setting of the building. Otherwise there are not considered to be any harms from the development of this site.

Policy VC TAS1: North of Church Road

1.2ha of land is allocated for approximately 25 dwellings.

The developer of the site will be required to ensure:

- **Access from Church Road, with a continuous vehicular and pedestrian link through to a second access from Henry Preston Road. Church Road to be widened to 5.5m in front of the site, with a 2.0m footway connecting to existing provision;**
- **The layout and landscaping of the site respects and protects the setting of the nearby listed Old Hall Farmhouse;**
- **Early engagement with Anglian Water regarding the sewer crossing the site;**
- **The Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development;**
- **The existing woodland to the northern end of the site is protected and enhanced;**
- **Land is set aside for Use Class F1(a), for future expansion of Preston VC CE Primary School.**

39. Tharston, Hapton and Flordon

Form and character

Tharston and Hapton

There are three main groups of development within the parish concentrated on The Street (Tharston), Chequers Road adjoining Long Stratton and in Hapton. Outside of these there are some isolated areas of sporadic development. The western edge of the parish adjoins the Tas Valley.

Development in The Street incorporates a variety of dwelling types alongside farms. This combined with substantial tree and hedge planting, especially along the road frontage gives the settlement its strong rural character.

In the south of the parish are housing estates off Chequers Road which are contiguous with Long Stratton, and towards the northern end of Chequers Road a broken ribbon of development. This ribbon is rural in character.

Hapton is a small settlement which has developed along the line of The Street. Some development has occurred to the north of this and the settlement has experienced limited modern infill development.

Flordon

The settlement of Flordon comprises two physically distinct areas. One is situated around the main Norwich-London railway line bridge, and the other has developed further to the west around the parish church. The village has experienced limited estate scale housing development in the form of a small housing estate (St Michaels View) together with some more recent infill development.

The village is characterised by good tree and hedge planting together with significant open frontages which contribute towards its rural setting. To the south of The Street is a tributary valley of the River Tas which includes Flordon Common, an SSSI.

Services and Community Facilities

The cluster has limited facilities if excepting the development contiguous with Long Stratton, which contains a surgery, residential care home and industrial estate. There is a primary school in Hapton and a village hall in Tharston, with some areas for

recreation and employment and a limited bus service to Norwich, Long Stratton and Diss.

Settlement Limit

Hapton

Hapton does not currently have a Settlement Limit.

Flordon

The Settlement Limit is fragmented and drawn to include the estate development at St Michael's View to the west and the groups of dwellings either side of the rail track to the east. It excludes the Rectory, church room and a few dwellings on the south of The Street.

40. Thurlton and Norton Subcourse

Form and character

Thurlton

The main concentration of development has developed in a linear settlement form based upon the historical road network based along Beccles Road, Church Road and Low Road although modern estate development off Beccles Road has resulted in a more nucleated form in this area. In addition, the village has experienced a considerable amount of modern infill which has generally respected the existing character of frontage development. There is a detached group of houses at College Road, whilst the wooded grounds of All Saints Church and The Rectory provide a 'soft' edge to the village which makes an important contribution to its rural character.

The village is set in an attractive landscape with Thurlton Marshes and the Broads to the north and a small tributary valley immediately to the west with views of the surrounding countryside from within parts of the built-up area. Part of the parish lies with the Broads Authority area. Beccles Road provides a relatively good link to Beccles and the A143 to the south, whilst the nearby B1136 links to the A146 and Loddon to the west and Haddiscoe and the A143 to Great Yarmouth to the east.

Norton Subcourse

The main concentration of development within the parish is based along Loddon Road/The Street and adjoins the main built-up area of Thurlton. There is a small scattering of development based along Low Road with development in the remainder of the parish comprising dispersed individual dwellings and farmsteads. The village is set within a small tributary valley with the marshland of the River Yare within the Broads Authority area immediately to the north. The good open views of the surrounding landscape from within many parts of the built-up area, together with areas of good tree and hedge planting, provide the village with its essentially rural character.

The former B1140 provides a link to the A143, A146 and Beccles to the south, and to Reedham via the Reedham Ferry to the north. The B1136 links the village to Haddiscoe and Gt Yarmouth to the east and Loddon to the west.

Services and Community Facilities

Thurlton has a range of social and community facilities including a preschool, primary school, post office and shop, public house and village hall. There are also opportunities for recreation and employment in the settlement. There is a limited bus service to Norwich and a daily service to Beccles.

Settlement Limit

Thurlton/Norton Subcourse

The Settlement Limit includes the main built form of the settlement and extends west to include Norton Subcourse, but excludes the playing fields next to the village hall.

Site allocations

VC THU1

The site is located to the east of Beccles Road, to the rear of existing development along the road frontage. Immediately to the north and south of the sites lies existing residential development and as such development of this site will have a minimal impact on the existing townscape. Thurlton FP3 Public Right of Way follows the southern boundary of the site, marking the transition between this and the recent development at Blacksmiths Gardens to the south. The Public Right of Way connects the site to the existing footpath network and afford direct access to the existing facilities and services within the village, including the village school.

Recent development at Blacksmiths Gardens retains open boundaries along the Public Right of Way and development of this site will be required to provide similar a boundary solution to avoid enclosure of this footpath. To minimise the visual impact of the development on the approach from the north-east along the Public Right of Way consideration will also need to be given to the boundary to the north of the site. Furthermore, the scale of development adjacent to the existing properties along Blacksmiths Gardens, Links Close and Meadow Close should reflect the scale and form of that development to protect the amenities of existing and future occupiers.

For reasons of highway safety, vehicular access to the site is only permissible via Blacksmiths Gardens. The Highways Authority have advised that the standard of road through this development will restrict the scale of development that is possible on the allocation site. The site is allocated for a minimum of 12 dwellings to reflect this constraint however, subject to an appropriate site layout and design, a higher

number of dwellings may be achievable, should an acceptable solution be agreed with the Highways Authority.

Whilst no ecological constraints on the site have been identified, the site is located within a SSSI Impact Risk Zone. Natural England should be consulted if there is to be any discharge of water or liquid waste of more than 20m³/day to ground (i.e. to seep away), or to existing areas of surface water (such as a beck or a stream).

Some archaeological finds of limited significance were discovered on the adjacent land therefore investigation of the site may be required at the planning application stage, the details of which are to be agreed with the Historic Environment Service.

The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan.

The site is allocated for at least 12 dwellings on an area of 0.57ha, which is considered to be reasonable to reflect the scale and density of development on the adjacent sites as well as the highway constraints identified by the Highways Authority.

Policy VC THU1: Land north of Blacksmiths Gardens

0.57ha of land is allocated for at least 12 dwellings.

The development of the site will be required to ensure:

- **Vehicular access via Blacksmiths Gardens only;**
- **Appropriate boundary treatments to north-east and south-west boundaries to minimise the visual impact on Thurlton FP3;**
- **Historic Environment Record is consulted to determine the need for any archaeological surveys prior to development.**
- **The scale and layout of development reflects that of adjoining properties, to protect the amenity of existing and future residents.**

VC THU2

The site lies to the west of Beccles Road in Thurlton. The site is well related to the settlement and is connected to the facilities and services that are available locally via an existing pedestrian link on the opposite side of Beccles Road. An extant planning permission (2016/2904) exists on part of the site for 5 dwellings and the allocation boundary has been drawn to incorporate this planning permission within VC THU2.

The site is reasonably contained in wider views by the existing development adjacent to it, as well as the existing vegetation along the site boundaries. Retention and enhancement of these Priority Habitats and the existing significant trees along the southern and western boundaries will provide some visual mitigation of the development of the site.

There are changes in ground levels across the site and there will be a requirement to address these appropriately at the planning application stage. The scale of development on the site, as well as the site layout, will respond to the existing ground levels and will be designed to protect the amenities of existing and future residents. The site layout should also incorporate the existing pond in the southern corner of the site.

The Lead Local Flood Authority has identified a surface water flow path adjacent to the site. Whilst it does not impact on development of the site its presence should be noted in the preparation of a planning application.

The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan.

In the interests of highway safety vehicular access into the site will only be via Beccles Road.

The site is allocated for up to 15 dwellings on a site area of 0.77ha. This number includes the existing planning permission for 5 units and represents an uplift of 10 dwellings on the site. A maximum of 15 dwellings on this site is considered to be appropriate, reflecting the irregular site boundaries and responding to the identified constraints on the site.

Policy VC THU2: Land adjacent to Holly Cottage, west of Beccles Road

0.77ha of land is allocated for up to 15 dwellings.

The development of the site will be required to ensure:

- **Vehicular access from Beccles Road only;**
- **The protection and enhancement of the Priority Habitats along the south and west boundaries, including the retention of significant trees, to minimise the visual impact of the site and retention of the existing pond;**
- **Site layout and design informed by a topographical survey to reflect the changes in levels across the site in order to protect the amenities of existing and future residents.**

41. Thurton and Ashby St Mary

Form and character

Development within Thurton parish has been concentrated along Ashby Road north of the A146 and is contiguous with the main built-up area of Ashby St Mary. Development south of the A146 is limited to The Street and Loddon Road. In Thurton, detached clusters of development exist along Cookes Road, White Heath Road and Hall Road; in Ashby St Mary, a detached cluster of development exists at Mill Common, to the east of the built-up area, and scattered development at Low Common and along Folly Lane. The remainder of both parishes is made up of individual dwellings and farmsteads.

The village is based on the historic road network, in particular Mill Road/Ashby Road and The Street, although estate development has occurred on either side of Mill Road/Ashby Road, resulting in a nucleated settlement form. The village of Thurton is set in an attractive tributary valley of the River Yare. The wooded areas to the north and east of the village are a particularly attractive feature of the valley and are important in the rural setting of the village, and combined with the open character of The Street give the village an attractive semi-rural character. The A146 provides good road links with Norwich, Loddon and Beccles.

Services and Community Facilities

Thurton has a range of facilities, including a preschool group, primary school, village hall, recreation facilities and pub. There is also a regular bus service to Norwich and Lowestoft.

Settlement Limit

The Settlement Limit includes the main built form of the settlement, excluding the playing field and central triangle of land opposite the pub.

42. Tivetshall St Mary and Tivetshall St Margaret

Form and character

Tivetshall St Mary & Tivetshall St Margaret

Development in the Tivetshalls is principally along The Street/Rectory Road in a linear form comprising mainly single plot development. Development is also concentrated around School Road and Green Lane to the north. Clusters of development are located at Rectory Road to the south but these are away from the facilities that the Tivetshalls share. The village has an open rural character derived from the tree and hedge planting and views of the surrounding open countryside. Development in the remainder of the parish comprises individual dwellings and farmsteadslopment in the remainder of the parish comprises individual dwellings and farmsteads

Services and Community Facilities

There is a limited range of facilities shared by the Tivetshalls; a primary school and village hall which are located around Green Lane/School Road. A public house is located away from the built-up areas on the A140 Norwich-Ipswich road. There are some opportunities for recreation and there is a limited bus service to Norwich and Diss.

Settlement Limit

The Settlement Limit has been drawn around the existing built-up area of The Street, School Road and Thwaites Oak Close to prevent further extension of development into the surrounding countryside whilst allowing for limited infill development within it. Outlying areas, further from facilities have been excluded from the defined Settlement Limit. A minor addition to the Settlement Limit has been included, incorporating an area of land west of The Street and immediately south of the existing Settlement Limit that was promoted and assessed as part of the Plan process.

Site allocations

VC TIV1

The site lies west of The Street and south of Mill Road, Tivetshall St Mary, set behind existing development that fronts onto both of those roads. Tivetshall primary

school, village hall and recreation ground lie a short distance to the north of the site. The Old Ram lies nearby on the A140 where a limited, but peak time, bus service between Norwich and Diss also runs.

The existing built-form of the village is characterised by linear ribbon development and the development of the site would represent a departure from this. However, by virtue of its position, the site will be, to some extent, screened by existing development along The Street and Mill Road and otherwise visually contained from wider views by boundary hedgerows. Moreover, it will result in a more contained form of development that avoids further intrusion into the countryside along existing roads. The existing hedgerow along the southern boundary should however be retained, reinforced and protected and the presences of bungalows along the east and north of the site will limit the density that can be achieved on site.

Vehicular access to the site will be via The Street. Whilst there are continual not footways along The Street that link to the footways near the local school, village hall and recreation ground there is a 30mph speed limit along the street and large verges for pedestrians to step off the carriageway if necessary.

The allocation of a 1.12ha site for approximately 20 homes is considered to appropriately reflect an efficient use of land whilst ensuring that the impact on the amenity of neighbouring properties can be minimised.

Policy VC TIV1: Pear Tree Farm, west of The Street

1.1 hectares is allocated for approximately 20 homes

The developer of the site will be required to ensure:

- **Vehicular access via The Street.**
- **Overlooking and visual impact of new development on the residential amenity of existing single storey buildings adjacent to the eastern and northern boundaries is minimised.**
- **Appropriate assessment of potential ground contamination and the undertaking of remedial works as necessary to address any identified issues.**
- **Retention, reinforcement and protection of the existing hedgerow along the southern boundary of the site.**

43. Toft Monks, Aldeby, Haddiscoe, Wheatacre and Burgh St Peter

Form and Character

Toft Monks

Development within the parish has been concentrated around the junction of Yarmouth Road/Beccles Road, Post Office Road/Mardle Road and along Bulls Green Lane. Development within the remainder of the parish comprises individual dwellings and farmsteads.

The main village comprises two distinct areas which are separated by the open field to the south of Mardle Road and which is important in contributing towards the generally open appearance from which much of the attractive rural character of the village is derived.

Development along Yarmouth Road, both sides and along the west side of Bulls Green Lane has taken the form of ribbon development. Along Beccles Road development is limited to the east of the road whilst to the west is the open field separating the two parts of the village. To the north of Mardle Road is Grade 2 agricultural land.

Aldeby

Development within the parish has been concentrated in two separate clusters at The Street and around Common Road. Individual dwellings and farmsteads are dispersed throughout the remainder of the parish.

Development at The Street is linear in form and comprises one plot depth along The Street, Beccles Road and Rectory Road. It is set in open countryside with the attractive Waveney Valley to the south and close to the Broads.

Development at Common Road comprises a small concentration of dwellings centred on the crossroads of Dun Cow Road, Common Road and Lily Lane.

The settlement is characterised by tree and hedge planting along the road frontages although the open nature of the western side of Dun Cow Road, north of the crossroads, affords particularly good views of the surrounding countryside.

Much of the southern part of the parish lies within the Broads Authority area.

Haddiscoe

Development along The Street and Thorpe Road has resulted in a linear form of settlement characterised by one plot development the main exception being the Tayler and Green housing at Mock Mile Terrace. The mainly undeveloped nature of the north side of Thorpe Road provides attractive views towards the River Waveney, which contribute to the rural character of the area. The detached area of development at Rectory Road also displays a strong linear form.

The settlement is an attractive valley landscape with the Waveney Valley to the north and a small tributary valley to the west. The settlement is also in close proximity to the Broads, with much of the parish lying within the Broads Authority area

Wheatacre & Burgh St Peter

Development within the parish has been concentrated around the crossroads formed by Beccles Road, Staithe Road, Pitt Road and Mill Road. The remainder of the parish comprises a small number of widely dispersed individual dwellings and farmsteads with the exception of the small concentration of development at the River Waveney Centre in the east of the parish. Part of the built-up area of Burgh St Peter lies within the adjacent parish of Wheatacre and for the purposes of a village Settlement Limit is included within the boundary of Burgh St Peter.

The village of Burgh St Peter has developed a linear settlement form comprising one plot depth along Beccles Road, Staithe Road, Mill Road and Pitt Road. Good tree and hedge planting exists especially along the eastern side of Pit Road, whilst elsewhere within the village a more open character prevails allowing for good views of the surrounding countryside, in particular the Waveney Valley which lies to the south and east and the Broads which are in close proximity to the north, south and east of Burgh St Peter. Much of the parish therefore lies within the Broads Authority area.

Services and Community Facilities

Toft Monks has a pub and Haddiscoe a village hall with some space for recreation plus a pub. Glebelands Community primary school is on the A143 in between the two villages. Burgh St Peter also has a village hall with recreation space, with a pub on the road to Wheatacre. A number of employment opportunities exist throughout the cluster, including at Aldeby Business Centre. All villages in the cluster except Haddiscoe share a daily bus service to Norwich, Beccles and Loddon. Toft Monks and Haddiscoe also have a regular service to Bungay and Yarmouth.

Settlement Limit

Toft Monks

The Settlement Limit has been drawn to reflect the existing settlement form and to prevent further development extending into the surrounding open countryside whilst providing for some limited infill development within it.

Aldeby

The settlement limits have been drawn around the two main concentrations of development centred on The Street and Common Road. They have been drawn to allow for very limited infill due to the lack of facilities locally and to prevent the further extension of development into the surrounding open countryside, in particular the adjacent valley landscape of the Waveney valley.

Haddiscoe

The Settlement Limit has been drawn around the existing development at Rectory Road to prevent the further extension of this ribbon of development and to protect its attractive rural valley setting to the west, and around the main built-up area along The Street and Thorpe Road.

Wheatacre & Burgh St Peter

The Settlement Limit has been drawn to include the main built form of the adjoining settlements to allow for limited infill development due to the rural nature of the area. The Settlement Limit has been updated to include a small parcel of land west of Mill Road which has been promoted and assessed as part of the Plan process.

Site allocations

VC HAD1

The site occupies the northern section of a large agricultural parcel of land and lies immediately to the south of the A143, a Corridor of Movement. Opposite the site, to the north of the A143, is Haddiscoe Manor Farm. Haddiscoe Village Hall lies immediately adjacent to the east of the site. A pedestrian footpath runs along the north side of the A143, connecting the site to the village services and facilities including the bus service to larger settlements.

The site currently provides a visual break in the settlement to the south of the A143 however existing mature trees and hedgerows along the site boundaries mean that it

is contained within long views and development in this location will not have a significant visual impact on the wider landscape. Appropriate landscaping of the site, including but not limited to the protection and enhancement of the existing boundary treatments, will be required due to the proximity of the site to the Broads Area.

The site layout will reflect the proximity of the site to the A143 to protect the residential amenities of the future residents. The site design and building orientation should be designed to reduce the noise impact wherever possible. As part of minimising the noise impact of vehicular traffic on residential development in this location a significant area of open space should be retained at the front (north) of the site, adjacent to the A143. Consideration should also be given as to how landscaping can be used to buffer traffic noise, whilst retaining key views across the frontage of the site.

To the south-west of the site, on elevated ground, is St Mary's Church a listed building visible from the A143. The open setting of this listed building contributes to its significance, as evidenced in the Heritage Impact Assessment, and as such development on this site will be set back from the A143, to avoid an adverse impact on the setting of this heritage asset. The layout and design of the site will complement the setting of the Church whilst retaining the views towards it from the A143. In addition, liaison with the Historical Environment Service will be required as part of the planning application process to determine the requirement for archaeological investigation.

Vehicular access to the site will be from the A143. The Highways Authority has indicated that development in this location could assist in reinforcing the current 30 mph speed limit. Several on- and off-site highway works have been identified as being necessary to preserve highway safety and the free flow of traffic. These works include the provision of a right turn lane junction into the site as well as a crossing point to connect the site to the existing pedestrian footpaths in the village. Opportunities for improvements to Rectory Road, adjacent to the west boundary of the site, should be explored by the developer in conjunction with the Highways Authority, as part of the site design and layout

The Lead Local Flood Authority has confirmed that whilst the wider area is subject to significant surface water flowpaths the site is not impacted. The drainage strategy should have regard to the wider context of the site. Vehicular access into the site will need to have regard to those areas noted as being at risk of surface water flooding within the highway.

The receiving Water Recycling Centre (Haddiscoe Mock Mile-Terr) is small and consequently development of HAD1 may have a disproportionate impact on the WRC, requiring upgrades. The site itself is also not directly connected to the sewer system and will require the requisitioning of a connection. Early engagement with Anglian Water is recommended on these issues.

The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan.

An area of 3.01ha is allocated for up to 35 dwellings. This is considered to be a reasonable site area, allowing for an appropriate scale of development on the site whilst providing sufficient land to address the constraints identified above.

Policy VC HAD1: Land south of Haddiscoe Manor Farm

3.01 hectares of land is allocated for up to 35 dwellings.

The developer of the site will be required to ensure that:

- **Vehicular access from A143, unless otherwise agreed with the Highways Authority and the Local Planning Authority;**
- **Highway works to ensure the continued safe and free-slow of traffic to include the provision of a right turn lane junction and a pedestrian crossing point to enable safe pedestrian access to the existing pedestrian footpath to the north of the A143;**
- **An area of open space is retained at the north of the site, adjacent to the A143, to minimise the impact of the A143 on the amenities of future residents;**
- **The site layout, including dwelling orientation, is designed to protect the amenities of future residents in terms of traffic noise;**
- **Connectivity of the site includes a pedestrian footway within the site to connect the site to the village hall to the east;**
- **Site layout and design to maintain the views and setting of St Mary's Church, including long views towards the site from the A143, through the setting back of development within the site;**
- **Appropriate landscaping of the site to reflect its sensitive location, including the retention, protection and reinforcement of the**

existing hedgerows to the east and west boundaries of the site and the introduction of an appropriate boundary to the south of the site, which both visually contains the site and reflects the rural nature of the location;

- **Historic Environment Record to be consulted to determine the need for any archaeological surveys prior to development**;
- **Early engagement with Anglian Water regarding the capacity of the receiving WRC and the requisitioning to new sewers and any consequent need to phase the delivery of the site.**

VC BUR1

The site is located adjacent to the crossroads that form the centre of the village, north of Staithe Road and east of Pit Road. To the south of Staithe Road, extending to the east, is linear development which includes the village hall. Aldeby Business Park, a local employment centre, and a public house are within close proximity to the site. A limited bus service connects the village to both Norwich and Beccles. The local primary school, Glebeland Community Primary School, is located in Toft Monks.

Whilst the site is currently well contained within the immediate landscape it is visible from the Broads Area and as such appropriate landscaping to the north of the site will be required to minimise the visual impact of the development. To complement the existing form of ribbon development in this location, linear development only along Staithe Road will be acceptable. In order to avoid retain the rural character of the area development should be set back from the road frontage. There is an existing mature hedgerow along the site frontage however in order to facilitate safe access into the site it is possible that it will be necessary to remove this hedgerow either in part or full. Consideration should be given to shared accesses, to minimise hedgerow loss and opportunities for replacement planting within the site should be maximised.

The local Highways Authority have advised that on and off-site highway works will be required to ensure that highway safety is maintained. These works may include localised carriageway widening along the site frontage (Staithe Road) with opportunities to create improvements to the adjacent Beccles Road/Pit Road/ Staithe Road/ Mill Road junction to be explored. Provision for a pedestrian footpath across the site frontage will be necessary with further localised improvements to the existing footpaths to be agreed in conjunction with the Highways Authority and the Local Planning Authority. Highway works associated with the development should be

proportionate to the scale of the proposal and a contribution towards the improvements identified may be the most appropriate solution.

Developers may wish to seek early engagement with Anglian Water (AW) to ensure that the site layout and design proposals are compatible with the AW's infrastructure located to the north-west of the site. Anglian Water has not raised any concerns about the development of this site through the site allocation process and development in this location is considered to be acceptable.

During the consultation process some concerns were raised locally about instances of surface water flooding within the local area, particularly along Mill Road to the south of the site. The Lead Local Flood Authority has engaged with the site allocation process and a Strategic Flood Risk Assessment has also been undertaken to support the selection of sites and no technical concerns have been identified as part of this process. An appropriate drainage strategy for the site will be agreed at the planning application stage and may improve the existing drainage situation noted in some of the public consultation comments.

Wheatacre Church Lane Water Recycling Centre (WRC) is small and consequently development of BUR1 may have a disproportionate impact on the WRC, requiring upgrades. The site also discharges upstream of the WRC where there are capacity constraints and sewer upgrades are likely to be necessary, therefore early engagement with Anglian Water is recommended.

An area of 0.56ha of land is allocated for at least 12 dwellings, which is considered to be an appropriate site area to enable a layout and design that is compatible with the local context.

Policy VC BUR1: Land north of Staithe Road

0.56ha of land is allocated for at least 12 dwellings.

The developer of the site will be required to ensure:

- **Site design, layout and landscaping to reflect the rural setting and avoid the introduction of a harsh settlement edge along the site frontage in order to ensure a compatible form of development;**

- **An appropriate boundary treatment to be incorporated along the northern site boundary to minimise the visual impact of the development on the Broads Area;**
- **On- and off-site highways works to be agreed in conjunction with the Highways Authority and the Local Planning Authority including: localised improvements to the existing carriageway at Staithe Road along the site frontage as well as a review (and possible improvements to-) the existing Beccles Road/ Pit Road/ Staithe Road/ Mill Road junction, and provision for a footpath along the site frontage.**
- **Early engagement with Anglian Water regarding the capacity of the Wheatacre Water Recycling Centre and the local sewer network.**

44. Wacton

Form and Character

Wacton is a small rural settlement situated only a few miles from the A140 to the southwest side of Long Stratton. The settlement is more concentrated to its north side along Church Road and Hall Lane but opens up southeast of Hall Lane at the green, becoming more rural with its large historic common to the far south.

Services and Community Facilities

There are limited services in the parish, but there is a village hall and recreational facilities.

Settlement Limit

There is currently no Settlement Limit in Wacton.

45. Wicklewood

Form and Character

The main concentration of development has taken place along Wymondham Road, High Street, Hackford Road, Church Lane and Low Street. Further clusters of development have taken place at Milestone Lane and The Green. Individual farmsteads and dwellings are sparsely distributed through the rest of the parish. The core of the village has frontage development which encircles the nursery, mushroom farm and some agricultural land. A couple of small estate-type developments have grown up at All Saints Close and Hillside Crescent. Church Lane and Low St are located on the north-facing slope of a valley, and the dwellings here benefit from views of the surrounding countryside. The Grade II listed windmill is a distinctive feature on the eastern side of the High Street and dominates the skyline of this part of the village. Good road links exist to Wymondham and Hingham via the B1135 and B1108 respectively.

Services and Community Facilities

There is a good range of facilities including a primary school, village hall, recreation field and pub. Wicklewood has a regular bus service to Norwich and Wymondham.

Settlement Limit

The Settlement Limit has been drawn to include the main built form of the settlement. There is a small break in the Settlement Limit where the central agricultural land is accessed (behind the mushroom farm on Church Lane).

The South Norfolk Place-making Guide advocates protection of the setting of local landmarks, such as Wicklewood windmill. There are surface water drainage issues in the village, and development must address this issue.

Site allocations

VC WIC1

The site is located west of The Green, south west of Hackford Road and south of Wicklewood Primary School. The site is in a prominent location on the approach to the village and currently marks the transition between the surrounding countryside and the settlement. The main focus of the settlement is to the north of Hackford Road and is accessible via the existing pedestrian footways in the village. A wider

range of facilities and services are also available in the market town of Wymondham, located a short distance from the village.

The site is within a prominent plateau landform and forms a smaller area within a larger agricultural field. As such it is recognised that there are landscape and visual impacts associated with development of this site. However, an assessment of the context of the site has confirmed that with careful landscaping and layout this site offers an opportunity to create a key gateway entrance to the village, as well as reinstate previously lost hedgerow landscape features. To achieve these objectives there will be a particular emphasis on the soft landscaping, on-site tree planting and the layout and design of the site. This landscape focus is reinforced by the organic boundaries of the site. An area of open space in the north east corner of the site will form a visual focal point around the existing village sign, reinforcing the gateway location and retaining an open aspect at the junction of Hackford Road, Wymondham Road and The Green.

Vehicular access to the site will only be permissible via The Green and a suite of off-site highways works have been identified as being necessary to support the development of this site. These highways works include: localised carriageway widening of The Green to a width of 5.5metres between the site entrance and Hackford Road, a frontage footway across the site frontage and extending north to Wicklewood Primary School and the creation of a crossing point to the connect the site to existing facilities to the north of Hackford Road.

An area of surface water flooding has been identified to the south of the site, with some areas of ponding also noted within the carriageway along the site frontage, however this is not considered to be a constraint that would prevent development of the site.

The site is within the catchment of Wymondham Water Recycling Centre (WRC) and the in-combination effects with development identified in the GNLP may require phasing of this site beyond the early years of the Plan.

An area of 1.63ha is allocated for up to 30 dwellings. This is considered a reasonable site area to ensure that landscaping of the site is appropriate to respond to the identified landscape constraints.

Policy VC WIC1: Land to the south of Wicklewood Primary School

1.63ha is allocated for up to 30 dwellings.

The development of the site will be required to ensure:

- **Landscaping of the southern and western boundaries of the site, respecting the need to integrate the site with the surrounding open rural landscape, as well as the retention and reinforcement of the existing hedgerow along the northern boundary;**
- **A layout that includes an area of open space around the existing village sign to create a gateway into the settlement;**
- **Off-site highway works to include localised carriageway widening of The Green to a width of 5.5metres between the site entrance and Hackford Road, a footpath along the site frontage to connect with Wicklewood Primary School and a crossing point across Hackford Road to improve connectivity to the existing settlement.**

VC WIC2

The site is located south-west of Hackford Road and north of Wicklewood Primary School. The Grade I listed St Andrew's and All Saintworss Church is to the north of the site. Wicklewood War Memorial is also located within the churchyard. The main focus of the settlement lies to the east of Hackford Road and is accessible via the existing pedestrian footways in the village. A wider range of facilities and services are also available in the market town of Wymondham, located a short distance from the village.

The site is currently in use for grazing and is well contained within the landscape with existing residential development to the east and west. An established hedgerow denotes the boundary along Hackford Road, with mature trees restricting views into the site from the north. Development of the site will need to maximise opportunities to maintain wider views of the Church whilst also seeking to conserve its immediate setting. The Heritage Impact Assessment concludes that with an appropriate site design and layout, as well as reinforcement of the existing landscaping to the north, the impact on the wider views of the Church can be mitigated appropriately.

The Highways Authority have advised that a frontage footway connecting the site to Wicklewood Primary School will be necessary. Vehicular access with appropriate visibility splays may result in the loss of the existing hedgerow along Hackford Road

however opportunities to retain or replace this with appropriate landscaping should be included within the site layout and design.

The site is within the catchment of Wymondham Water Recycling Centre (WRC) and the in-combination effects with development identified in the GNLP may require phasing of this site beyond the early years of the Plan.

An area of 0.89 hectares is allocated for a minimum of 12 dwellings which is considered to be an appropriate density reflecting the wider context of the site.

Policy VC WIC2: Land off Hackford Road

0.89 ha is allocated for a minimum of 12 dwellings.

The development of the site will be required to ensure:

- **Site layout and design to maximise wider views of St Andrews and All Saints Church, whilst also seeking to conserve the immediate setting of the heritage asset;**
- **Retention and enhancement of the existing landscaping along the northern boundary of the site;**
- **Highway works to include pedestrian footpath along the site frontage to connect to Wicklewood Primary School and a crossing point on Hackford Road to improve access to the other services and facilities in the village.**

Carried forward allocations

VC WIC3

Previously called WIC1, this allocation from the 2015 Local Plan is carried forward within this document to ensure that development on the site continues to be achievable in an appropriate manner. An application for 9 dwellings has been submitted and at the time of preparing this plan is pending determination (2021/1076), subject to addressing of the wider nutrient neutrality matter.

Part of this site fronts onto Hackford Road, with the rest of the site wrapping behind the curtilage of existing housing.

Policy VC WIC3: Land at Hackford Road

0.7 hectares is allocated for housing for approximately 6 dwellings.

The developer of the site is required to ensure the following:

- **Vehicular access from Hackford Road;**
- **Appropriate landscaping to the south of the site to minimise its visual impact on St Andrew and All Saints Church and its setting, as well as appropriate boundary treatments along the north and east boundaries of the site to reflect its rural context and edge of settlement location**.

46. Winfarthing and Shelfanger

Form and Character

Winfarthing

Winfarthing has developed a linear settlement character along The Street, part of Hall Road and Mill Road, with outliers of development at Short Green and Goose Green. Winfarthing comprises mainly single plot frontage development including a mixture of housing types and some notable old buildings. The Street is characterised by several areas of open frontage formed mainly by the playing field and several farms which contribute towards the dispersed nature of much of the development, especially in the southern half of the village which has a very open aspect.

The village contains a conservation area in the centre containing a variety of development interspersed with open spaces and an attractive tree-lined area adjacent to St. Mary's Church. The visual interest along The Street is enhanced by a number of notable old buildings and complemented by the bends in the road.

Shelfanger

The settlement has developed along the B1077 and contains a mixture of old and new development centred on the junction of The Street, Church Road and Rectory Road, with newer extensions to the east and west. The built-up areas are surrounded by large open field with few trees or hedgerows affording distant views especially to the north and to the west.

Services and Community Facilities

The parish contains a range of facilities including a school and pub in Winfarthing, and a village hall with a recreation field in Shelfanger. There is a daily bus service to Diss.

Settlement Limit

Winfarthing

The potential for development is limited by the linear nature of Winfarthing. The existing Settlement Limit has been drawn to allow for limited infill within it. The Settlement Limit includes the areas within the main village which are developed but excludes the area considered to form an attractive setting to the church. The boundary therefore maintains the separation of the existing settlements while

providing for limited infill development which should enhance the form and character of the village.

Shelfanger

Much of the existing built form of the settlement is within flood zone areas and the form and character of the settlement limits the potential for further development if further intrusion into the countryside is to be avoided. The Settlement Limit has been defined to provide some limited infill development whilst precluding further expansion of the ribbon development to the east and west of the village.

Site allocations

VC WIN1

The site is located west of Hall Road and immediately north of development at Chapel Close. It is in a prominent location at the entrance to the village and marks the transition between the surrounding countryside and the settlement. The site is connected to the existing services and amenities in the village, including the village hall to the north, by existing pedestrian footways.

The site is part of a wider agricultural field and as such there are currently no defined boundaries along the western boundary and only a small number of trees along the northern boundary, closest to Hall Road. A low-level native hedgerow marks the eastern boundary, adjacent to Hall Road. To the south Chapel Close is a crescent form of development with an area of open space forming a central feature in the development. Development of the site, including the location of public open space, will need to respond to the existing form of development at Chapel Close. Frontage development on the site is also required to reflect the linear nature of development throughout Winfarthing. The northern boundary of the site will be landscaped to lessen the visual impact when approaching the village along Hall Road.

Off-site highway improvement works have been identified to ensure the continued safe and free-flow of the existing highway network. These works include widening of Hall Road along the site frontage as well as connectivity to and improvements to the existing pedestrian provision where reasonable, including an upgraded provision along the site frontage. The details of the works to the existing pedestrian footway provision will need to be confirmed at the planning application stage in agreement with Norfolk County Council Highways Authority.

A surface water flowpath has been identified to the west of the site, within the wider agricultural field, but this does not extend into the site boundaries. Whilst recognising that existing surface water flows are contained to the highway and adjacent ditches, the Stage 2 SFRA identifies that future development and climate change could impact on existing flows. A drainage strategy for the site will need to demonstrate that there will be no increase in surface water flood risk as a consequence of the development of the site.

Winfarthing Water Recycling Centre (WRC) is small and consequently development of WIN1 may have a disproportionate impact on the WRC, requiring upgrades, therefore early engagement with Anglian Water is recommended.

An area of 1.0ha is allocated for approximately 20 dwellings.

Policy VC WIN1 – Land west of Hall Road

1.0ha of land is allocated for approximately 20 dwellings.

The development of the site will be required to ensure:

- **A layout that responds positively to the form and layout of the adjacent development at Chapel Close and includes frontage development onto Hall Road;**
- **Landscaping of the northern boundary designed to lessen the visual impact when approaching the village from the north along Hall Road;**
- **Off-site highway works to include widening of Hall Road along the site frontage and improvements to the existing pedestrian footpaths, details of which to be confirmed in agreement with Norfolk County Council Highways Authority.**

VC WIN2

The site lies to the west of Mill Road at the southern edge of the settlement. The linear site mirrors the existing form of development on the opposite side of Mill Road. Furthermore, the site is connected to the local services by existing pedestrian footways.

Currently there are no boundary treatments delineating the site. However, an established row of trees lies to the south of the site, outside the boundary of the site, and restricts views into the site on the approach from the south. Development on the site will be of modest linear form, reflecting the existing pattern of development to the

north and east of the site. The western and southern boundaries of the site should comprise soft landscaping to minimise the impact of the development on views from the Public Right of Way network. With appropriate design, development of the site is not considered to impact on the Winfarthing Conservation Area or the other designated heritage assets identified in the Historic Impact Assessment.

The Stage 2 SFRA identifies a small area of the site in the north-eastern corner as being at risk of surface water flooding in all AEP flood events. Whilst development on the wider site is not precluded a precautionary approach to development is required in this area of the site. A site-specific Flood Risk Assessment will be required for this site to inform the final layout, including the location of the public open space.

For highways safety reasons a number of off-site highway works will be required. These include: the provision of a pedestrian footway along the site frontage, a formal crossing point to facilitate safe access to All Saints Primary School on the opposite side of Mill Road and discussions with Norfolk County Council to establish the requirement for a 20mph Traffic Regulation Order to maintain highways safety on the approach to the primary school.

Winfarthing Water Recycling Centre (WRC) is small and consequently development of WIN2 may have a disproportionate impact on the WRC, requiring upgrades, therefore early engagement with Anglian Water is recommended.

The site is allocated for up to 20 dwellings on an area of 0.98ha which is a scale of development that is considered to be compatible with the existing linear form of development adjacent to the site.

Policy VC WIN2: Land off Mill Road

0.98ha is allocated for up to 20 dwellings.

The development of the site will be required to ensure:

- **A linear form of frontage development only to reflect the existing character and to provide an appropriate gateway to the Conservation Area;**
- **A site-specific Flood Risk Assessment (FRA) and strategy, to inform the access arrangements and layout of the site, and which**

has regard to the Stage 2 VC Strategic Flood Risk Assessment (SFRA);

- **Measures to ensure the satisfactory and safe operation of the highway network, including the provision of a pedestrian frontage footway with a formal crossing point across Mill Road to enable safe access to the primary school;**
- **Soft landscaping along the southern and western boundaries of the site to reflect the rural location and minimise the landscape impact of the development.**

47. Woodton and Bedingham

Form and character

Woodton

The village has a predominantly nucleated settlement pattern based around Hempnall Road, The Street, Triple Plea Road and Chapel Hill. Some limited estate scale development has taken place in the village. The village is set in an attractive valley landscape being situated on a south facing valley slope with a smaller tributary valley to the east. The attractive setting of the village, the views of the surrounding countryside from various parts of the village, and the good tree and hedge planting throughout, combine to give the village its attractive rural character. The B1527 provides a link to the A140 and Long Stratton to the west, whilst the B1332 to the east of the village provides links to Norwich and Bungay.

Bedingham

The northern part of this parish forms part of the built-up settlement area of Woodton. The majority of the parish is sparsely populated with development concentrated along School Road, with the remaining individual dwellings and farms showing a dispersed pattern.

Services and Community Facilities

The settlement has a range of social and community facilities including a primary school, pub, village hall and recreation facilities. There is a regular bus service to Norwich and Bungay.

Settlement Limit

The Settlement Limit has been drawn to include the main built form of the settlement, including the ribbon development north along The Street and the WOO1 allocation. There is no settlement limit around the School road area of Bedingham.

Site allocations

VC WOO1

The site at Woodton is to the north east of the settlement, south of Church Road and west of Norwich Road. It is adjacent to both the Woodton recreation ground and Woodton Primary School, which both lie to the east. The Village Hall and Ravens

Den (a community wood and play area) are to the south west of the site, accessed via Hempnall Road. Existing pedestrian footpaths connect the site to the village however these are restricted in places, particularly along Norwich Road to the east.

The site has a gently undulating topography and due to the open aspect of the site there are currently long views across the site to the north, west and south. A mature hedgerow along the east boundary of the site should be retained as far as possible with appropriate boundary treatments introduced along the west boundary of the site. Boundary treatments should sensitively reflect the transitional location of the site between the countryside and village, whilst any development to the south of the site must protect the amenities of both existing and future residents.

In terms of highways safety, development to the north of the settlement is considered to be preferable. As a consequence of this development the B1332 / B1527 junction may require some improvements and the developer is encouraged to enter into early engagement with the Highways Authority to determine the extent of these works. Other highway works identified include road widening along the site frontage. Elsewhere, existing pedestrian connectivity around the primary school site is noted as being substandard. Development of VC WOO1 provides an opportunity to improve the current situation by creating a new pedestrian link between Woodton Primary School to the east and The Street to the south, via both the recreation ground and The Woodyard Square and as such this is a policy requirement for the delivery of this site.

Primary and/or pre-school education facilities in the village will be enhanced through the delivery of this site. This will be achieved through the safeguarding of land within the allocation site, or through the repurposing of land within the existing recreation ground with the loss of land being compensated for by safeguarded land within the allocation site boundary. The safeguarded land within VC WOO1 for education or recreation use (reflecting the options set out above) must be delivered in addition to the Council's current requirements for open space (as set out in the Council's adopted 'Guidelines for Recreation Provision in New Residential Developments' SPD, September 2018, or subsequent replacement document).

Other considerations for the delivery of this site include the possible requirement for phased development reflecting existing capacity at the Waste Recycling Centre (WRC) and in the local sewer network. The developer of the site is encouraged to engage with Anglian Water at the earliest opportunity to explore this further.

The Minerals and Waste Authority has identified the site as being underlain, or partially underlain, by safeguarded sand and gravel resources. As such development on the site must comply with the relevant minerals and waste safeguarding policy in the Norfolk Minerals and Waste Local Plan.

An area of 3.3 ha is allocated for up to 50 dwellings. Due to the delivery of the additional community benefits associated with this site, specifically the improved pedestrian connectivity for the village and the provision of an area of land to support the ongoing pre-school education facility within the settlement, as well as the standard infrastructure requirements, the scale of development proposed is considered to be reasonable in accordance with the objectives of the VCHAP.

Policy VC WOO1: Land south of Church Road

3.3ha of land is allocated for up to 50 dwellings.

The developer of the site will be required to ensure:

- **Liaison with the Highways Authority to determine the extent of works required to the B1332/B1527 road junction as well as road widening along the site frontage;**
- **Provision of a pedestrian footpath to connect Woodton Primary School with The Street via the recreation ground, the site and The Woodyard Square to the south;**
- **The provision of an area of land to be safeguarded for either education or recreational use in order to secure the continued and future pre-school provision within the village;**
- **Retention and protection of the existing Priority Habitat hedgerow along the east boundary of the site;**
- **Site layout and design to reflect the current open views across the site and protect the amenities of existing and future residents to the south of the site.**
- **Boundary treatments to contain the visual impact of the site, whilst reflecting the rural context;**
- **Early engagement with Anglian Water regarding the need to phase the site to address capacity issues with both the Water Recycling Centre and the local sewer network.**

48. Wreningham, Ashwellthorpe and Fundenhall

Form and character

Wreningham

The village centre is linear, with ribbon development following Church Road, Wymondham Road and Ashwellthorpe Road, with a pocket of further development along Mill Lane. The primary school is located centrally where the four roads meet, and further along Mill Lane at the Norwich Road junction is the hamlet of Toprow.

The village is surrounded by large open fields interspersed with hedgerows and a few trees. Toprow lies along a shallow valley. Narrow lanes and mature trees contribute to the village's rural atmosphere. The B1113 provides a direct link to Norwich.

Ashwellthorpe & Fundenhall

The main concentration of development has taken place along both sides of The Street resulting in a predominantly linear settlement. A further ribbon of development extends at the western end of The Street, southwards on New Road. Some estate development has taken place at Knyvett Green, Greenwood Close and Muskett Road on the south of The Street. To the north of The Street is Lower Wood, a large wooded area (and SSSI) forming an attractive backdrop to the village and contributing to the rural character and setting of the village. Good road links exist to Wymondham on the B1135 and Norwich via the B1135 and A11.

Services and Community Facilities

Wreningham has a primary school, village hall and pub. Ashwellthorpe has a new viallge hall and adjoining recreation facilties, as well as pre-school provision, and Fundenhall a pub. Fundenhall has a daily bus service to Wymondham, Ashwellthorpe a limited service to Norwich and Diss, and Wreningham has access to both.

Settlement Limit

Wreningham

The Settlement Limit has been drawn to include the main built form of the settlement The Settlement Limit covers most development along Wymondham Road, Ashwellthorpe Road and Church Road, up to the junction at Hethel Road as well as

limited infill on Church Road. The existing Settlement Limit has been extended to the west, along Wymondham Road, to include three dwellings granted planning permission by 2018/2301. The clusters of development to the east of the church and to the north-east of Hethel Road are excluded from the Settlement Limit. The separate Settlement Limit at Mill Lane/Toprow includes most of the cluster of dwellings in that location and has been altered to allow limited infill.

Ashwellthorpe

The Settlement Limit has been drawn to include the main built form of the settlement, with two breaks at Wood Farm and Church Farm and has been extended to include the development at Muskett Road, Browne Close, Goodrum Close and Warman Way.

Site allocations

VC ASH1

The site lies to the south of existing linear development on New Road, Ashwellthorpe. Vegetation and mature trees line the north, south and west boundaries of the site whilst the eastern boundary is open to New Road. The site occupies a transitional location on the approach into the village from the south. A pedestrian footpath along The Street connects New Road with the new village hall and the existing preschool facilities in Ashwellthorpe.

Originally promoted for allocation as two separate parcels of land the site is allocated as one site in order to maximise the benefits of housing delivery. A single scheme, with no artificial subdivision, is required for the site.

The Priority Habitat hedgerows and mature trees along the south and west boundaries restrict views into and out of the site and should be retained and protected to minimise the visual impact of the development in the wider landscape. Reflecting the existing pattern of development along New Road development on the site should be set back from the road frontage to avoid an urbanisation of the streetscene.

A single vehicular access into the site is preferred. The highways authority has identified a number of on-and off-site highway works associated with the delivery of the site. These include the provision of a footpath along the site frontage, improvements to the New Road/ The Street intersection to improve the current

visibility at this junction and the provision of a pedestrian crossing point from New Road to enable safe access to the existing footpath north of The Street.

Discussions with the Lead Local Flood Authority (LLFA) have identified a significant surface water flowpath to the west of the site with water flowing in a northerly direction towards the River Tiffey. A small area in the north -west corner of the site is noted in the Stage 2 Strategic Flood Risk Assessment (SFRA) as being at risk of surface water flooding in all AEP events, where development should be avoided. Due to the relatively small area shown to be at risk it is considered that this issue can be mitigated through careful design and that it does not preclude development of the overall site. Furthermore, the LLFA have advised that with an appropriate drainage strategy, development of the site could result in an improvement to the existing situation off-site. However, a site-specific Flood Risk Assessment (FRA) will be required for the site and will need to have regard to the matters raised in the Stage 2 SFRA. The FRA will inform the layout and design of the development, the access and egress routes for the site as well as any further mitigation measures that may be required.

Local concerns have been raised regarding drainage issues in the locality. Anglian Water has indicated that issues are likely to be the result of extreme events (storms, snow melt etc.) and that ongoing monitoring of the local storm tank is in place, with planned upgrades in 2027. Anglian Water has also noted that the receiving Wastewater Recycling Centre (WRC) has limited permit headroom remaining and that a new permit will be required to accommodate further development. Developers are encouraged to enter into early engagement with Anglian Water to ensure appropriate phasing of the site.

The site is located in an area identified as being within Groundwater Source Protection Zone 3. Site developers will be required to liaise with the Environment Agency to ensure that water quality is not adversely affected however this does not preclude development of the site.

An area of 0.89ha is allocated for up to 15 dwellings, reflecting the on- and off-site constraints identified above, the standard infrastructure requirements for the site and the edge of village location.

Policy VC ASH1: Land west of New Road

0.89h of land is allocated for up to 15 dwellings.

The development of the site will be required to ensure:

- **A site-specific Flood Risk Assessment (FRA) and strategy to inform the layout/development of the site, including access and egress arrangements. The FRA must have regard to the requirements set out in the Stage 2 Strategic Flood Risk Assessment;**
- **On- and off-site highway works to include safe access into the site from New Road, a pedestrian footpath along the site frontage which is to be of suitable appearance for the location, a crossing point to facilitate safe pedestrian access from New Road to the existing footpath north of The Street; and a proportionate contribution to an upgrade to the existing New Road /The Street junction (to be agreed with the Highways Authority and the Local Planning Authority);**
- **Development to be set back from the road frontage to reflect the existing pattern of development along New Road;**
- **Retention and protection of the Priority Habitats and mature trees along the west and south site boundaries to minimise the visual impact of the development and the enhancement of the existing vegetation along the north boundary to protect the amenities of future and existing residents.**

Monitoring Framework

Topic	Indicator	Target
Housing supply	Number of Homes Completed	Delivery of 1,200 2018 to 2038 or 60 homes per annum
Housing supply	Number of Affordable Homes Completed	Affordable homes delivered as a percentage to total homes delivered in accordance with GNLP policy requirement
Housing supply	Number of planning permissions granted on allocated sites where S106 provides for policy compliant affordable housing	80%
Communities	Number of planning permissions granted on allocated sites where the housing mix meets policy requirements	80%
Communities	Number of Self-Build CIL exemptions	Contribute to maintaining South Norfolk's duty to provide serviced plots
Communities	Net change in number of core services and facilities	Neutral/Positive
Character	Number of planning permission granted on allocated sites which meet specified density requirements	80%

Site progress tracker for each allocation

Monitoring Framework also proposed to include a simple progress tracker for each site allocations. The target for each allocation would be for it to be complete by 31st March 2038. An example table to track site progress is set out below:

Topic	**Reference / Progress Indicator**
Site Reference	**e.g. ALP1**
Pre-application Enquiry Received	Yes or No
Outline Application	Submitted, Approved or Refused
Reserve Matter / Full Application	Submitted, Approved or Refused
Commenced	Yes or No
Completed	Yes or No

Glossary

Accessible

In the case of community facilities and services (such as healthcare), easy to travel to or use. With reference to buildings or public transport, easy to enter and use by all.

Affordable housing

Housing provided for sale or rent at prices below the current market rate, which people in housing need are able to afford. Affordable housing tenures are defined in government guidance, as set out in Annex 2 of the National Planning Policy Framework.

Allocated

Land which has been identified for a specific use in the current Development Plan.

Area Action Plan (AAP)

A development plan document within the local plan that establishes a set of development proposals and policies for a specific area. In South Norfolk Area Action Plans have been written for Long Stratton and Wymondham.

Biodiversity

The variety of different types of plant and animal life in a region.

Biodiversity net gain

Refers to development having a positive impact on biodiversity, leaving it in a better state than before development occurred.

Brownfield land, brownfield site

Land or site that has been subject to previous development.

Brownfield Register

Brownfield land registers provide up-to-date information about sites that local authorities consider to be appropriate for residential development having regard to the relevant legislation.

Built environment

The man-made surroundings that provide the setting for human activity, ranging in scale from personal shelter to neighbourhoods to the large-scale civic surroundings.

Business use

Land use class covering light industry, offices, research and development.

Climate Change Mitigation

Actions taken to limit the magnitude or rate of global warming and its associated effects, usually involving a reduction in human emissions of greenhouse gases.

Commitments

Development proposals which already have planning permission or are allocated in adopted development plans.

Community facilities

Services that meet the day-to-day needs of a community such as village halls, post offices, doctors' and dentists' surgeries, play areas, recycling facilities, libraries and places of worship.

Community Infrastructure Levy (CIL)

A financial charge on new development introduced by the Planning Act 2008 as a tool for Local Authorities to help deliver infrastructure to support growth and development in their area. Within the Greater Norwich area the CIL 123 List sets out which infrastructure items may be funded by CIL payments.

Conservation area

Area of special historic and/or architectural interest which is designated by the Local Planning Authority as being important to conserve and enhance. Special planning controls apply within these areas.

County Wildlife Site (CWS)

Wildlife habitat identified and designated as being of particular local interest or importance by Norfolk County Council and the Norfolk Wildlife Trust but which is not of sufficient national merit to be declared as a Site of Special Scientific Interest. A CWS does not benefit from statutory protection but does have some protection in the planning system.

Cross-subsidy housing

The provision of a limited amount of market housing on a development site to ensure that the provision of affordable housing on the same site is equitable

Custom-Build

A form of self-build home that is, in some form, supported by a developer through a more hands off approach than a traditional self-build would entail.

Decentralised and renewable or low-carbon energy sources

Sources of energy that are renewable or low-carbon (or a combination of these) and locally based (on-site or near-site, but not remote off-site), usually on a relatively small scale. Decentralised energy is a broad term used to denote a diverse range of technologies, including micro-renewables, which can locally serve an individual building, development or wider community and includes heating and cooling energy.

Development

Defined in planning law as 'the carrying out of building, engineering, mining or other operations in, on, over, or under land, or the making of a material change of use of any building or land'.

Development Boundary

See Settlement Limit.

Development brief

A document describing and leading the form and layout of development in a prescribed area.

Development Plan

A set of plans guiding future development in the area. The Development Plan consists of the locally prepared Development Plan documents, including Neighbourhood Plans approved at referendum.

Development Plan Document

Locally prepared document on a specific topic which forms part of the Development Plan and which subject to independent examination before adoption, (also commonly referred to as DPDs.)

Environmental Impact Assessment (EIA), Environmental Statement (ES)

Written assessment, submitted with certain kinds of planning application, which sets out the anticipated effects of the proposed development. Such statements deal with the full environment effects of development proposals and include any mitigation measures needed under the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2018

Exception site

A small site to be used specifically for affordable housing that would not normally be acceptable for housing as it would be subject to policies of restraint. These sites are generally located at the edge of existing settlements.

Five-year housing land supply

A requirement by Government for Local Planning Authorities to ensure that there is sufficient land available that is suitable, available and deliverable for housing development. The amount of land available should be sufficient to fulfil the housing requirement for the next five years.

Geodiversity

The variety of different types of geology, landforms, soils and physical processes in a particular region.

Greater Norwich Growth Board (GNGB)

A partnership between Broadland District Council, Norwich City Council, South Norfolk Council, Norfolk County Council and New Anglia Local Enterprise Partnership (LEP) to provide homes, jobs and infrastructure. It also provides strategic direction, monitoring and co-ordination of the Greater Norwich City Deal.

Green infrastructure

A network of multi-functional green space which delivers benefits to both the environment and the local community. Green infrastructure includes natural green spaces colonised by plants and animals and man-made managed green spaces such as areas used for outdoor sport and recreation including public and private open space. These spaces may include allotments, urban parks and designed historic landscapes as well as their many interconnections such as footpaths, cycleways, green corridors and waterways.

Greenfield land, greenfield site

Land which has not previously been built on, including land in use for agriculture or forestry. Greenfield land does not include residential garden land.

Habitat Regulations Assessment (HRA)

An HRA identifies any aspect of the emerging Local Plan that would have the potential to cause a likely significant effect on Natura 2000 sites or sites protected by European designations (Special Areas of Conservation, Special Protection Areas, Ramsar sites) either in isolation or cumulatively, and to identify appropriate avoidance and mitigation strategies where impacts are identified.

Heritage Asset

A building, monument, site, place, area or landscape with historic interest that provides a material record of history or meaning for a community. Heritage assets may be either 'designated' or 'non-designated' and have a degree of significance that merits consideration in planning decisions.

Historic environment

Aspects of the environment which result from the interactions between people and places through time.

Housing Delivery Test

Measures net additional dwellings provided in a local authority area against the numbers of homes required using national statistics and local authority data. The Housing Delivery Test data is published annually by the Secretary of State.

Inclusive Growth

A form of economic growth that aims to improve opportunities for everyone in the local community.

Index of Multiple Deprivation

A ward-level index made up from six indicators (income; employment; health deprivation and disability; education; skills and training; housing; and geographical access to services)

Infill development

Small-scale development filling a gap within an otherwise built up area.

Infrastructure

The network of services to which it is usual for most buildings or activities to be connected. Infrastructure includes physical services serving the particular development (e.g. gas, electricity and water supply; telephones, sewerage) and also includes networks of roads, public transport routes, footpaths etc as well as community facilities and green infrastructure.

Joint Core Strategy (JCS)

A key planning policy document for the Greater Norwich Area produced in partnership between Broadland, Norwich and South Norfolk that sets out the long-

term vision for the area up until 2026. The JCS has a considerable impact on the Greater Norwich Local Plan (GNLP) which in turn determines growth up until 2038 and will supersede the JCS when adopted.

Local Nature Reserve (LNR)

Area of botanical or wildlife interest where access and use by local people is encouraged through designation by the local authority.

Local centre

A group of shops or services forming a centre of purely local significance.

Local housing need

An assessment of the need for housing at a local level using the standard methodology set out by the Government.

Low-carbon

To minimise carbon dioxide emissions from a human activity.

Major development

For housing, development where 10 or more dwellings are to be provided or the site has an area of 0.5 hectares or more. For non-residential development, it means additional floorspace of 1,000m2 or more or a site of 1 hectare or more.

Market Housing

Housing that is for sale on the open market without restrictions on the pricing or tenure.

Masterplan

A long term planning document that provides a conceptual framework to guide future growth and development.

Mineral Safeguarding Area

An area designated by minerals planning authorities (in the GNLP area being Norfolk County Council) which covers known areas of minerals deposits that are to be safeguarded from non-mineral development

National Planning Policy Framework (NPPF)

A document which sets out the Government's economic, environmental and social planning policies for England and how they should be applied. It provides a baseline structure from which locally-prepared plans (such as the GNLP) can be produced and it is a material consideration in planning decisions.

National Planning Practice Guidance (NPPG)

A web-based resource which brings together planning guidance on various topics into one easily accessible place. The guidance supports the NPPF but is not government policy.

Neighbourhood Plan

A plan prepared by a parish/town council or neighbourhood forum for a designated neighbourhood area. Once made by the Local Planning Authority it becomes part of the Development Plan for the area.

Non-strategic policies

Policies contained in a Neighbourhood Plan, or those policies in a local plan that are not strategic policies.

Norwich fringe

Area next to the city of Norwich, but lying in another administrative district which is predominantly developed, including open spaces encompassed within the developed area. In South Norfolk this area includes Colney, Costessey, Cringleford and Trowse.

Open Space

Areas of land that usually come forward as part of a development site which remain undeveloped but can generally be used for either formal or informal recreation purposes.

Permission in Principle

A form of planning permission which establishes the suitability of a site for a specific amount of housing-led development. The site must subsequently obtain consent for the technical details before development can proceed.

Planning conditions

A condition imposed on a grant of planning permission which can either require additional details to be agreed or restrict the use of the site.

Planning obligations

Legal agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer to ensure that specific works are carried out, payments made or other actions undertaken which would otherwise be outside the scope of the planning permission. Often called Section 106 obligations. The term legal agreements may embrace S106.

Previously developed land

See Brownfield land.

Protected species

Any species which, because of its rarity or threatened status is protected by statutory legislation (The Wildlife and Countryside Act 1981 (as amended) and the Conservation (Natural Habitats etc) Regulations 1994).

Ramsar site

A European designation that protects areas of wetland.

Recreational Impact Avoidance and Mitigation Strategy (RAMS)

A strategy facilitating residential development, whilst at the same time adequately protecting wildlife sites from harm that comes with growth in rural areas from increased recreation pressure.

Renewable energy

Energy generated from sources which are non-finite or can be replenished. Includes solar power, wind energy, power generated from waste, biomass etc.

Rights of Way, Public Rights of Way

Public footpaths and bridleways as defined in the Countryside and Rights of Way Act 2000. The phrase ‘rights of way’ include the above and permissive routes where there is no legal right of way but access is permitted by the landowner.

Scheduled Ancient Monument

Ancient structure, usually unoccupied, above or below the ground, which is preserved by order of the Secretary of State. Works affecting an ancient monument must be approved by the Secretary of State.

Section 106 Agreement (S106)

See planning obligations

Settlement Hierarchy

A way of arranging settlements into a hierarchy based upon a number of criteria, such as population and services offered.

Settlement Limit

A boundary line defining the extent of the consolidated built-up area of a settlement. Further development will normally be acceptable within defined Settlement Limits, subject to site specific constraints or considerations. Sometimes also called development boundaries, settlement boundaries or village envelopes.

Shared equity, Shared ownership

Arrangements whereby home buyers may pay only part of the initial cost of buying their home. Shared equity means topping up a small deposit with an equity loan and acquiring the rest of the home with a mortgage. Shared ownership involves buying a stake in a home with the remaining proportion being owned by (typically) a housing association.

Site Allocation DPD

A document used to identify sites to accommodate the range of land uses necessary to implement the objectives of the local plan. South Norfolk adoped a site allocations document in 2015.

Site of Special Scientific Interest (SSSI)

Site or area designated as being of national importance because of its wildlife, plants or flower species and/or unusual or typical geological features. SSSIs are identified by Natural England and have protected status under the Wildlife and Countryside Act 1981.

Special Area of Conservation (SAC)

Special Areas of Conservation are defined in the European Union's Habitats Directive (92/43/EEC), also known as the Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora. They are defined to protect the 220 habitats and approximately 1,000 species listed in Annex I and II of the Directive which are considered to be of European interest following criteria given in the Directive.

Special Protection Areas (SPAs)

Special Protection Areas are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive, which was amended in 2009 (Directive

2009/147/EC). They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species.

Starter homes

New build properties built exclusively for first time buyers aged between 23 and 40 years. A number of criteria must be met for a dwelling to be considered as a starter home.

Strategic policies

Policies and site allocations which address strategic priorities in line with Section 19 of the Planning and Compulsory Purchase Act 2004.

Street furniture

Collective term for permanent structures installed within the highway, including footways and pedestrian areas. Includes street lighting columns, signs, seats, litter bins, telephone kiosks, post boxes etc.

Suitable Alternative Natural Green Space (SANGS)

A name given to green space that is of a quality and type suitable to be used as mitigation in relation to the protection of important natural spaces when residential development or growth is proposed.

Supplementary Planning Document (SPD)

Guidance published by the local planning authorities to provide further detailed information on how local plan policies are to be applied or interpreted. SPDs may be prepared jointly, particularly where a consistent policy approach is required over an area covered by more than one local planning authority. SPDs may be concerned with a particular issue, or may provide more detailed guidance of the development of a specific site, covering a whole range of issues. This is frequently referred to as a development brief.

Sustainability Appraisal (SA)

An appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.

Sustainable development

A term mostly derived from the 1987 Brundtland Report. Interpretation varies but typically the term means meeting economic and social goals without undermining the environment, as well as meeting needs of the present without compromising the environment for future generations. In 2015 the United Nations agreed 17 Sustainable Development Goals to be reached by 2030. The UK is amongst the countries leading the delivery of the Sustainable Development Goals.

Sustainable drainage system (SuDS)

Efficient drainage system which seeks to minimise wastage of water, including the use of appropriate groundcover to enable maximum penetration of clean water run-off into the ground and, where appropriate, recycling grey water within the

development. Designed to minimise the impact of development on the natural water environment.

Travel Plan

A long term management plan/ strategy that seeks to deliver sustainable transport objectives and is regularly reviewed.

Use classes order

The Town and Country Planning (Use Classes) Order, 1987 (as amended), a statutory order made under planning legislation, which groups land uses into different categories (called use classes). Change of within a use class and some changes between classes do not require planning permission.

Village cluster

A group of villages that share services and facilities, for example a primary school.

Water stress

Water stress occurs when the demand for water exceeds the available amount of water, or when poor water quality restricts its use.

Windfall site

Site on which planning permission for housing development is granted during the plan period but which has not previously been identified in the plan for housing development.

Appendix A: List of New and Carried Forward Allocations

Table 1 New Village Cluster Plan Allocations

Parish	Ref	Location	Allocation Numbers	Net Additional Dwellings
Alpington	VCALP1	Land at Church Meadow	25	25
Bergh Apton	VCBAP1	Former concrete works site, Church Road	25	25
Great Moulton	VCGRE1	Land west of Heather Way, Great Moulton	12	12
Aslacton	VCASL1	Land off Church Road	35	35
Barford	VCBAR1	Land at Cock Street and Watton Road, Barford	19	19
Barnham Broom	VCBB1	Land on the corner of Bell Road and Norwich Road	40	40
Bawburgh	VCBAW1	Land east of Stocks Hill	35	35
Bressingham	VCBRE1	Land east of School Road	40	40
Brooke	VCBRO1	Land at Norwich Road	50	50
Bunwell	VCBUN1	Land to the north of Bunwell Street	15	15
Bunwell	VCBUN2	Land opposite Lilac Farm, Bunwell Street	20	20
Ditchingham	VCDIT1	Thwaite Rd/ Tunneys Lane	35	35
Earsham	VCEAR1	Land east of School Road, Earsham	24	24
Geldeston	VCGEL1	Land off Kells Way	20	20
Gillingham	VCGIL1	Land south of GIL1 site	35	35
Hales & Heckingham	VCHAL1	Land off Briar Lane, West Hales	35	35
Hempnall	VCHEM1	Land at Millfields	15	15
Ellingham	VCELL1	Land south of Mill Road, Ellingham Island	25	25
Ellingham	VCELL2	Florence Way	12	12

Parish	Ref	Location	Allocation Numbers	Net Additional Dwellings
Little Melton	VCLM1	Land at School Lane & Burnthouse Lane, Little Melton	35	35
Swardeston	VCSWA1	Land off Bobbins Way	20	20
Mulbarton	VCMUL1	Land south of Rectory Lane	35	35
Needham	VCNEE1	Land north of High Road and Harman's Lane	15	15
Wortwell	VCWOR2	Land at Mill Hill, High Road, Wortwell	12	12
Newton Flotman	VCNEW1	South of Alan Avenue	25	25
Pulham St Mary	VCPSM1	Land northwest of Norwich Road and Poppy's Lane	50	50
Rockland St Mary	VCROC1	Land west of Lower Rd, south of New Inn Hill	25	25
Rockland St Mary	VCROC2	Land south of The Street	25	25
Seething	VCSEE1	Land west of Mill Lane	12	12
Spooner Row	VCSPO1	Land west of Bunwell Rd	15	15
Spooner Row	VCSPO2	Land south of Station Road	25	25
Stoke Holy Cross	VCSTO1	Land north of Long Lane	25	25
Tacolneston	VCTAC1	Land to the west of Norwich Road	25	25
Tasburgh	VCTAS1	Land north of Church Road & west of Tasburgh school	25	5
Thurlton	VCTHU1	Land north of Blacksmiths Gardens, Thurlton	12	12
Thurlton	VCTHU2	Land adjacent to Holly Cottage, west of Beccles Road	10	10
Tivetshall St Mary	VCTIV1	Pear Tree Farm, west of The Street	20	20
Haddiscoe	VCHAD1	Haddiscoe Manor Farm	35	35
Burgh St Peter	VCBUR1	North of Staithe Road	12	12

Parish	Ref	Location	Allocation Numbers	Net Additional Dwellings
Wicklewood	VCWIC1	Land to the south of Wicklewood Primary School	30	30
Wicklewood	VCWIC2	Land off Hackford Road	12	12
Winfarthing	VCWIN1	Land to the west of Hall Road	20	20
Winfarthing	VCWIN2	Land off The Street	20	20
Woodton	VCWOO 1	Land south of Church Road	50	50
Ashwellthorpe & Fundenhall	VCASH1	Land to the west of New Road	15	15
		Allocation Total	**1,122**	**1,102**

Table 2 Neighbourhood Plan Allocations

Parish	Ref	Location	Allocation Numbers	Net Additional Dwellings
Scole	DDNP11	Land east of Norwich Road, Scole	50	50
Scole	DDNP10	Flowerdew Meadow, Norwich Road, Scole	25	10
Roydon	DDNP8	Land south of Roydon Primary School, Roydon	25	25
Burston	DDNP9	Land west of Gissing Road, Burston	25	25
Dickleburgh	TBC	TBC	25	25
		Neighbourhood Plan Total	**150**	**135**

Table 3 Carried Forward 2015 Allocations

Parish	Ref	Location	Allocation / Permission Numbers	Net Additional Dwellings
Great Moulton	VCGRE2	North of High Green, West of Heather Way	14	0

Parish	Ref	Location	Allocation / Permission Numbers	Net Additional Dwellings
Carleton Road	VCCAR1	Land west of Rode Lane	3	-2
Hales	VCHAL2	Land at Yarmouth Road, west of Hales Hospital	23	3
Bracon Ash	VCBRA1	Land at Norwich Road, Bracon Ash	20	0
Swardeston	VCSWA2	Main Road	30	0
Wortwell	VCWOR 2	Land at the junction of High Road and Low Road	5	0
Newton Flotman	VCNEW 2	Land adjacent Alan Avenue	30	0
Spooner Row	VCSPO3	Land at School Lane	7	2
Spooner Row	VCSPO4	Land at Chapel Road	14	0
Tacolneston	VCTAC2	Land adjacent the Fields	21	1
Wicklewood	VCWIC3	Land at Hackford Road	6	0
		Carry Forward Allocations Total	**173**	**4**

Table 4 2015 Allocations Not Carried Forward

Parish	Ref	Location	Allocation Numbers	Net Additional Dwellings
Barford	BAR`		0	-10
Surlingham	SUR2		0	-3
		Not Carried Forward Allocations Total	0	-13

Overall Number of Net Additional Homes = 1,228

Appendix B: Summary of Changes to Settlement Limits

Cluster	Settlement	Change
Alpington, Yelverton & Bergh Apton	Alpington	Addition of SN0529SL to the existing Settlement Limit on land east of Nichols Rd.
Aslacton, Great Moulton & Tibenham	Aslacton	Update to the existing Settlement Limit to include development on Pottergate St.
Aslacton, Great Moulton & Tibenham	Great Moulton	Update to the existing SL to include development at Sneath Road/ Woodrow Lane.
Barnham Broom, Kimberley, Carleton Forehoe, Runhall & Brandon Parva	Barnham Broom	Addition of SN0018SL to the existing Settlement Limit on land north of Norwich Road.
Barnham Broom, Kimberley, Carleton Forehoe, Runhall & Brandon Parva	Barnham Broom	Addition of SN2110SL to the existing Settlement Limit on land south of Norwich Road.
Bawburgh	Bawburgh	Addition of SN0002SL to the existing Settlement Limit on land east of Stocks Hill, north of the preferred allocation site VC BAW1.
Bawburgh	Bawburgh	Extension to the existing settlement limit to incorporate existing development along both sides of Stocks Hill, including the village hall (excluding the playing field) and new development at Saint Walstan Meadow.
Brooke	Brooke	Addition of SN0020SL to the existing Settlement Limit on land east of High Green and north of The Mallows Walk.
Bunwell	Bunwell	Extension to the existing Settlement Limit to include new development north of Bunwell Street at Smockmill Close.
Ditchingham	Ditchingham	Minor addition to the existing Settlement Limit to include SN2011SL, land north-west of Lambert's Way.
Little Melton & Great Melton	Little Melton	Minor extension to include new dwelling north of School Lane (2017/0251).
Little Melton & Great Melton	Little Melton	Moderate extension to include new development at All Saints Close (2015/1697).
Little Melton & Great Melton	Little Melton	Addition of SN1046REV (part) to the existing Settlement Limit on land north of Great Melton Road.
Little Melton & Great Melton	Little Melton	Moderate extension to include land south of School Lane and east of Burnthouse Lane (2017/2843), as well as a small area immediately to the north of this planning permission site to 'regularise' the boundary.

Cluster	Settlement	Change
Mulbarton, Bracon Ash, Swardeston & East Carleton	Mulbarton	Moderate update to include the self-build/ custom build site at Long Four Acre Avenue (2017/2131).
Mulbarton, Bracon Ash, Swardeston & East Carleton	Bracon Ash	Moderate addition to include 5 dwellings (2017/1521) at Nursery Close.
Mulbarton, Bracon Ash, Swardeston & East Carleton	Swardeston	Moderate extension to the existing Settlement Limit to incorporate development off Bobbins Way (2017/2247).
Needham, Brockdish, Starston & Wortwell	Brockdish	Minor extension to include new dwelling at The Street (2018/1190).
Needham, Brockdish, Starston & Wortwell	Wortwell	Inclusion of 3 dwellings on land south of High Road (2018/2019).
Needham, Brockdish, Starston & Wortwell	Wortwell	Addition of SN5045SL to the existing SL on land north of Wortwell United Reform Church and west of High Road.
Scole	Scole	Moderate extension to the Settlement Limit to include recent development west of Norwich Road at Kings Close (2016/0165).
Seething & Mundham	Seething	Creation of a new Settlement Limit around existing development west of Mill Lane.
Seething & Mundham	Seething	Extension of existing Settlement Limit west of Seething Road to include existing development as well as SN0406SL, SN0587SL and SN0588SL.
Tasburgh	Tasburgh	Moderate extension to the existing Settlement Limit at Lower Tasburgh to include both new and existing development at Low Road (2018/0290).
Tivetshall St Mary & Tivetshall St Margaret	Tivetshall St Mary	Minor addition to the existing Settlement Limit to include SN3002SL on land west of The Street.
Toft Monks, Aldeby, Haddiscoe, Wheatacre & Burgh St Peter	Burgh St Peter	Addition of SN4015SL to the existing Settlement Limit, land west of Mill Road.
Wreningham, Ashwellthorpe & Fundenhall	Wreningham	Minor addition to incorporate 3 new dwellings north of Wymondham Road (2018/2301).
Wreningham, Ashwellthorpe & Fundenhall	Ashwellthorpe	Addition of new development on land south of The Street at Muskett Road, Browne Close, Goodrum Close and Warman Way.

Appendix C: Housing Trajectory

	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	Total
South Norfolk Village Clusters Housing Allocation Plan Housing Trajectory											80	120	140	140	140	140	140	120	100	80	1,200
Greater Norwich Local Plan Housing Trajectory	2,182	2,182	2,182	2,182	2,118	2,118	2,118	2,118	2,118	2,118	2,118	2,118	2,118	2,118	2,118	2,118	2,118	2,118	2,118	2,118	42,616

Equality Impact Assessment (EqIA)

Assessing the impact of the South Norfolk Village Clusters Housing Allocations Plan (The Village Clusters Plan) upon different sections of the community.

Introduction

This EqIA reviews the Pre-submission Draft version of The Village Clusters Housing Allocation Plan (VCHAP), (the Regulation 19 version), in order to assess any potential impacts on equalities resulting from the Objectives of the VCHAP and its site-specific housing allocations.

The South Norfolk Village Clusters Housing Allocations Plan aims to deliver sustainable growth within the more rural parts of South Norfolk. The Village Clusters Plan is being developed alongside the Greater Norwich Local Plan (GNLP) and in accordance with Government's national planning policies and guidance (the GNLP has prepared its own EqIA). The main aim of the Plan is to allocate a series of smaller sites, 12 to 50 homes, across the 48 Village Clusters in South Norfolk, to accommodate at least 1,200 new homes in total. The Plan also defines the Settlement Limits for the villages within these clusters, making provision for further, smaller sites of up to 11 dwellings.

The Regulation 19 version of the VCHAP sets out the Council's chosen Plan, including Objectives for development across the village clusters and site-specific policy allocations, with background text, to support the allocation of each site. Following a review of the representations submitted in response to the Regulation 18 consultation it was determined that the Core Policies that had previously been included replicated existing planning policy; as such Core Policies have not been carried forward into the Pre-submission Draft version of the Plan.

The Regulation 19 Pre-submission Draft Plan is the version of the Plan that the Council intends to submit for Examination in Public. Representations submitted in response to the publication of this Plan should be related to matters of legal and soundness compliance.

In accordance with the Local Planning Regulations (2012), the Council will notify anyone who they considered has an interest, and the specific and general consultees as listed in the Regulations, including:

1. people who live in, work in and visit South Norfolk;
2. individuals, organisations, landowners and development companies needing to make planning applications to the Council, and the professional planning agents and architects who represent them;
3. public sector organisations (e.g. Norfolk Constabulary, Norfolk County Council);
4. housing associations, registered social landlords and other organisations in the voluntary sector;
5. general consultees (e.g. local interest groups such as those representing different racial, ethnic or national groups, different religious groups, disabled persons, Gypsies, Travellers and Travelling Showpeople and older or younger people);
6. statutory bodies (e.g. the Environment Agency, Natural England, Historic England) and;
7. neighbouring local authorities.

It is important to recognise that the needs of different equalities groups are considered throughout the process. The consequences of not recognising and addressing the different needs of different groups, could result in discrimination or a failure to promote the equality of opportunity for everyone. As a result, all of the protected characteristics under the PSED are considered within this report as part of scoping and screening exercises.

Legal Context

Local authorities are specifically required to undertake an EqIA under The Equality Act 2010. The requirement to undertake an EqIA stems from the duty placed on local authorities to eliminate unlawful discrimination in carrying out its functions, and to promote equality of opportunity.

The Equality Act 2010 requires local authorities to ensure that their plans and policies do not adversely impact upon any group with 'protected characteristics', and furthermore should encourage greater equality between different groups. The following characteristics are protected characteristics under the Public Sector Equality Duty (PSED):

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex; and
- sexual orientation

Applying the Public Sector Equality Duty to local plans, it is important to assess whether the Objectives and site-specific allocations in the South Norfolk Village Clusters Housing Allocation Plan have an impact (positive or negative) on any of the protected groups set out above, and how the Plan addresses socio-economic inequality.

Methodology

In producing the EqIA, various sources of information have been gathered by the Officer team involved in preparing the Plan in order to determine whether the VCHAP is likely to have an impact on, or discriminate against different groups, within the community. Such sources of information include the most recently available Census data, along with national and local statistics. Drafting of the Plan has also included the involvement of a range of organisations and consultees throughout the preparation period, including formally at the Regulation 18 stage of production. Progress on the EqIA has run in tandem with the production of the VCHAP and has been an iterative process, reflecting the evolution of the Plan itself.

This report will identify any protected groups which may be impacted (either positively or negatively) by each Objective in turn. If an Objective would have no impact on a particular group, the result is recorded as 'not applicable'. Moving through the Plan, an assessment of its impacts on protected groups has been categorised by theme rather than by individual site allocation. This approach recognises the similarities between the sites being allocated and therefore avoids unnecessary duplication, whilst still presenting the key findings in an accessible format. Where the screening exercise identifies that the Village Clusters Housing

Allocation Plan has an impact upon one or more group this is explained in more detail. If any negative impact exists, the Objective or site allocation has been subject to further consideration. The requirement for a full Equality Impact Assessment is considered with the aim of avoiding negative impacts upon the identified group or groups, and to take steps to meet the needs of people from protected groups where these are different from the needs of other people. In the instance that an impact on a protected group is identified (either positive or negative) the report will conclude with a proposed method of monitoring that impact.

For the purposes of preparing this updated EQIA a scoping exercise was undertaken. This determined that the residential land use policies proposed in the Village Clusters Housing Allocation Plan are unlikely to impact upon a person's personal identity or relationships. Therefore, the following protected characteristics have been scoped out of this report: gender reassignment, marriage and civil partnership, race, religion, sex and sexual orientation.

The screening exercise therefore focussed on the potential impact of the objectives and policies within the Plan (positive and negative) on people with the following protected characteristics:

- Age
- Disability
- Pregnancy and maternity

In addition to these protected groups, the Council has also considered it appropriate to assess the community impacts on other groups within the village cluster areas to ensure a robust assessment has taken place. The impact of the Plan on the following additional groups (in the context of the protected characteristics as defined by the Equality Act 2010) has therefore also been assessed:

- Health
- Place (including 'Rurality')
- Low Income and Poverty

The Equalities Profile of South Norfolk

An 'Equalities Profile' for South Norfolk can be found at Appendix 1, while Table 1 (below) sums up the baseline information of the different protected characteristics, which are focussed upon as part of the following assessment. The characteristics are in accordance with the list set out above.

At the time of preparing the interim EqIA in May 2021 the available Census data referred back to the 2011 Census. Since this time some updated information from the 2021 has been made available and Table 1 below has been updated to reflect this information.

Table 1: Summary of baseline information of protected characteristics

Protected Characteristic	South Norfolk
Age	The 2021 Census population figure for South Norfolk District is 141,947 persons in some 61,382 households. Nearly a quarter (24.3%) of the South Norfolk population is of retirement age (based on 65+ plus years) which has potential implications for health and social care, and potentially access to services. In 2011 the population figure for South Norfolk was 124,012 persons across 52,809 households with 21.4% of the population in South Norfolk of retirement age. This uplift in both overall population and age suggests that there will be continued implications for health and social care, housing need and access to facilities and services
Disability	Census respondents were asked to assess whether their health was very good, good, fair, bad or very bad. South Norfolk has a high percentage of persons with very good and good health, with only 4.5% with bad or very bad health. Another Census question asked whether residents had a long-term (12 months +) health problem or disability which limited their day-to-day activities. The results, as shown in Appendix 1 show that 7.4% of South Norfolk residents have a severely limiting health condition.
Pregnancy and maternity	In 2016 data for South Norfolk of the Live Birth Rate (CBR) was at 10,100 persons and the General Fertility Rate (GFR) of all live births per 1,000 women aged 15 to 44 was 62.1%
Health	Census respondents were asked to assess whether their health was very good, good, fair, bad or very bad. South Norfolk has a high percentage of persons with very good and good health, with only 4.5% with bad or very bad health.
Place inc. Rurality	In South Norfolk 78.6% of people live in rural areas, compared with 31% in the Eastern Region. 23,678 persons live in urban parts of South Norfolk, with 87,032 people living in rural areas (less sparse). Of that 87,032, 32,838 persons live in towns, 39,144 live in villages and 15,050 persons in dispersed areas.
Low Income and Poverty	The classification of household deprivation on the Census is independent of the English Indices of Multiple Deprivation

	published by the Office of the Deputy Prime Minister. Four dimensions from the Census returns have been identified as giving an indication of household deprivation. A household is deprived in a dimension if they meet one or more of the following conditions: • Employment: Where any member of a household, who is not a full-time student, is either unemployed or long-term sick. • Education: No person in the household has at least Level 2 education (see highest level of qualification), and no person aged 16 to 18 is a full-time student. • Health and disability: Any person in the household has general health that is 'bad' or 'very bad' or has a long-term health problem. • Housing: The household's accommodation is either overcrowded, with an occupancy rating -1 or less, or is in a shared dwelling, or has no central heating. Within South Norfolk: • 193 people identify as being deprived in all 4 dimensions • 2,381 people identify as being deprived in 3 dimensions • 11,241 people identify as being deprived in 2 dimensions • 17,956 people identify as being deprived in 1 dimension: and • 14,829 people identify as being not deprived in any dimension.

Source: 2011 Census ONS Crown Copyright Reserved [from Nomis on 26 April 2021]

The Equality Impact Assessment

Objectives and Settlement Limit Review

The following table illustrates the screening process for the objectives and the Settlement Limit review.

Any negative impact identified on a protected group will result in further consideration of the objective/policy and depending on the outcome the objective/policy may be subject to full Equalities Impact Assessment.

The table below identifies with a tick (✓) any protected groups which may be impacted positively, and with a cross (X), any protected groups which may be impacted negatively. Potential impacts identified are described in the next section, and any actions needed are explored in the conclusion.

Table 2: Screening the Equality Impacts of The Village Cluster Plan– Objectives, and Settlement Limit review

	Age	Disability	Pregnancy and maternity	Health	Place inc. Rurality	Low Income and Poverty
SNVC Objective 1 Meeting housing needs	✓	✓	✓	✓	✓	✓
SNVC Objective 2 Protecting village communities and support rural services and facilities	✓	✓	N/A	✓	✓	N/A
SNVC Objective 3 Protect the character of villages and their settings	✓	✓	N/A	N/A	✓	N/A
Amendment of Settlement Limits	✓	✓	N/A	✓	✓	✓

Potential Impacts

This section assesses the impact of the Objectives contained within the VCHAP on the identified protected characteristics.

Objective Polices' Impacts

- SNVC Objective 1 - Meeting Housing Needs: This objective seeks to provide new housing to meet housing needs and is considered to have a positive impact. Objective 1 ensures that allocated sites provide an appropriate mix of house types, sizes and tenures to allow for residents at different stages in their lives (for example, first-time buyers, affordable housing, upsizing/downsizing). The mix of housing on a site will be informed by the latest evidence base and the requirements identified within it. This approach to housing development benefits many different groups in society including first time buyers, persons with reduced mobility, low-income households, people with a physical disability and older residents. Updates to the existing Settlement Limits to encourage windfall development, in accordance with Objective 1, will encourage new development to take place in appropriate locations focusing development in settlements and in closer proximity to existing facilities and services. This will benefit residents of all ages, those who may suffer from ill-health and/or disabilities as well as low-income groups who are less likely to have access to a private car. Overall, the impact of this objective on protected characteristics is considered to be positive.

- SNVC Objective 2 - Protecting village communities and support rural services and facilities: Objective 2 seeks to provide opportunities for new housing development to support local services and facilities, meeting the needs of a range of occupiers who have the potential to support different local services and facilities. The promotion of well-located development that supports local facilities and amenities benefits all groups within the community but particularly those in the following protected groups who may have a greater reliance on access to local facilities: age, disability, pregnancy and maternity, health and low-income and poverty. A key output of this objective is the proximity and accessibility of allocated sites to the existing services and facilities within the cluster. However, it is also recognised that the historic organic growth of settlements and development in the rural areas means that existing services and facilities are often distributed throughout the cluster rather than being grouped together as would be more typical in a larger settlement. An alternative approach to the distribution of sites throughout the Plan area could have opted to focus development on fewer sites located within the larger settlements that typically benefit from a greater range of facilities and services. Whilst this may have some benefits, particularly to protected groups who may require access to a more diverse range of amenities, this would not provide the wider support to existing village communities or result in the same level of support for the rural services and facilities that are so important to the vitality of the smaller settlements that form a large part of the Plan area. Overall, the impact of this objective on protected characteristics is considered to be neutral.

- SNVC Objective 3 - Protect the character of villages and their settings: The third Objective of the Plan seeks to ensure that the scale, location and density of housing is well related to the form and character of existing villages and ensure appropriate landscaping measures are delivered as part of new development. The impact on protected characteristics is neutral.

Site Specific Site Allocation Impacts

Having considered above the Objectives within the Plan, it is also important to consider the site-specific allocations it sets out in order to identify whether any adverse impacts arise for any group with protected characteristics and establish whether the plan encourages greater equality between different groups. In doing so, it is important to recognise that the Village Clusters Housing Allocation Plan allocates only a small proportion of the total development and infrastructure being delivered across the entire Greater Norwich Plan area and as such the impacts identified within this specific EqIA must also be considered within the wider context of allocations being made within the remainder of the Local Plan. The impacts of allocations made in the Greater Norwich Local Plan are set out in the associated EQIA prepared to support the production of that Plan.

Many of the Policies and Objectives within the Plan will benefit the wider community across South Norfolk and not specifically those with protected characteristics. However, some will have the potential for some direct or indirect impact on different groups.

Applying the Public Sector Equality Duty to the VCHAP, an overall assessment of the positive and/or negative impacts of the Plan has been made and summarised below, grouped together by theme:

Age

The Village Clusters Plan will have a positive overall effect on all age groups, including persons within the younger and older protected characteristic groups.

Young children require schools and recreation facilities to be closely located to their homes. The proximity of allocated sites to key services, including play areas and primary education provision, has been a key consideration in the assessment of sites, as has the accessibility of these facilities from development sites. With only a few exceptions allocated sites are located within walking distance of the local primary schools, with a number of site-specific policies requiring upgrades to the existing footpath provision to improve this connectivity (for example, VC SPO2 at Spooner Row and VC TAC1 require the installation of a safe crossing points to the local schools from these sites). In addition, whilst all allocated sites may be expected to support the existing education facilities within the cluster to some degree via increased pupil numbers, some sites also facilitate the expansion of existing primary school facilities, or the provision of additional parking areas associated with the schools. In Gillingham, for example, an area of land of 0.5ha is to be safeguarded for the future expansion of Gillingham St Michael's Primary School. Similarly, policies for allocations in Tasburgh and Wicklewood seek to safeguard land to enable future growth of the primary school facilities should this be required in the future whilst in Woodton Policy VC WOO1 includes a direct requirement for land that will specifically ease the pressures currently being experienced at a local level by education providers.

For adults in older age groups and who may be less mobile access to services becomes more important. These age-related issues have been considered as part of the Plan with access to services and facilities being taken into account as part of the site assessment

process. Improvements to existing pedestrian footpaths feature in the policy requirements of a number of specific allocations with all sites requiring a frontage footpath to connect to existing provision as a minimum. Where it has been considered necessary and proportionate, improvements to the wider pedestrian network have also been set out in site specific policies to enhance the existing provision and facilitate pedestrian movement within a settlement. VC WOO1, for example, includes a new footpath connection between the primary school and recreation ground and the centre of the village thereby enabling users to access navigate around the settlement safely. However, it is recognised that not all village clusters benefit from the same range of services, or from the full range of services that would typically be available to residents of higher order settlements. This is largely due to the rurality of South Norfolk, where it is common for residents to rely on private vehicles and/or public transport to travel short distances to nearest local service centre. The Plan does, however, seek to improve connectivity in and around settlement wherever possible.

Boosting the vitality of existing communities/ settlements via the dispersal of new development throughout the village clusters will support the ongoing provision of existing facilities and services, and may support the growth and development of new amenities at a local level as the community grows. This positive impact may benefit those age groups within the protected characteristic groups, as well as different ages who choose to become involved with their local community facilities (for example, local businesses or community groups).

The Village Cluster Plan seeks to ensure housing mix that is in line with needs identified through the Strategic Housing Market Assessment (SHMA), which can reasonably be expected to help ensure that age-based needs are met across Plan. Population projections will require housing development to keep pace with anticipated growth in demand. Demand for certain types of accommodation may change, for example the demand for housing for elderly persons may increase as the numbers of residents falling into these categories also increase and development proposals will be expected to have regard to these changing requirements. Ensuring a balanced approach to housing mixes on allocated site will benefit and promote the equality of opportunity, whilst also promoting social cohesion within these communities, and facilitating the growth of local support networks.

Disability

Due to the nature of the site-specific allocations within the Village Clusters Housing Allocation Plan, the specific impacts arising from the Plan on people with disabilities is somewhat limited. Within this protected group it is considered most likely that persons with limited mobility would be impacted most by the Plan; however, it should be recalled that this Plan forms just one element of the strategic growth and development within the Greater Norwich area and as such the impacts of new development and infrastructure on this protected group should be considered as a whole. On balance it is considered that the VCHAP may have a positive impact on less mobile residents who wish to live within the rural areas of the District, noting the limitations of the Plan. Residents who require access to more specialist or diverse services and facilities may have seen a greater positive impact if the Village Clusters Housing Allocation Plan had directed more growth to the larger settlements which have the potential to offer a greater range of services. However, such needs are likely to be effectively addressed by the Council's emerging planning strategy when taken as a whole.

Overall, the VCHAP seeks to secure improvements to local facilities and services via improved connectivity and accessible development sites. Inevitably not all settlements

and/or clusters provide a full range of services however the presence and ease of access to existing facilities and amenities has been an important part of the site assessment and policy preparation process. A number of site-specific policies include a requirement for crossing points across the highway which will be of benefit to those persons with limited mobility. Similarly, the provision of car parking areas associated with local schools may also enable disabled carers and/or children to attend these sites more readily. In Alpington, for example, VC ALP1 requires the formalisation of the existing crossing point at Church Road to improve access to the village hall whilst VC HEM1 requires discussions with the Highways Authority to determine the need for a crossing point between the site and existing development at Millfields to services north of Mill Road (including the GP surgery). Improving the routes to existing facilities not only encourages access but also may open up these facilities, and the user groups of these facilities, to a wider group of residents.

It is recognised that some clusters have a more limited range of services than larger villages and towns. It is also acknowledged that whilst the Village Clusters Housing Allocations Plan seeks ensure footpath access to those services and facilities that exist wherever possible, there are some locations where this is not possible. Consideration has been given, however, to the safety of the highway for walking, including the availability of places to step off the highway (including where verges may be present).

Housing design standards benefit people with disabilities where there is a focus on accessible design. This is set out at a strategic level within the Greater Norwich Local Plan which has a range of policies that aim to improve access to services for all residents, seeks a percentage of adaptive homes, encourages use of Building for a Healthy Life and requires a Health Impact Assessment for some schemes. Any housing that is put forward in the Village Clusters Plan would need to be in accordance with this emerging policy (subject to inspector's main modifications).

Pregnancy and Maternity

The Village Clusters Housing Allocation Plan has a neutral-positive impact on persons within the protected group, 'Pregnancy and maternity'.

The VCHAP recognises that the availability and accessibility of a number of different facilities are important to local communities, as evidenced in the Site Assessment process. During the course of the Plan production period the Council engaged with the NHS Integrated Care Services (ICS) to better understand the constraints and opportunities afforded by the emerging Plan. It is clear that existing medical resources are under increasing pressure across the District, in common with the country as a whole. The dispersal of allocated sites throughout the village clusters does not focus new development solely in locations that have existing medical facilities. Rather, the scale and location of development aims to disperse new housing across the Plan area. Recognising the wider constraints that exist within the NHS at present, this approach will enable residents to seek local health provision where it exists, and it also supports the work of the outreach NHS workers who operate in the local community (for example, midwives and support healthcare workers). In this respect, the Plan may be considered to have a neutral impact on this protected group. Inevitably a wider range of medical facilities and services will be more readily available and accessible in the more developed settlements and towns and an increased level of housing growth in these larger settlements (rather than the balanced approach taken in the Plan) would potentially have a more positive impact on this protected group. Although the overall scale of growth proposed within the Village Cluster Plan as a

proportion of that across Greater Norwich as a whole does need to be taken into account in weighing the significance of this effect.

As noted in the previous sections however, the Plan seeks to improve connectivity and accessibility between sites and existing services/ facilities, whilst also making wider improvements to the highway and/or footpath network where this is considered to be reasonable and proportionate. In this respect the VCHAP may be considered to have a positive impact on this particular protected group through the improved linkages that will exist in the settlements. This connectivity can prove to be incredibly beneficial to those who are pregnant, as well as parents/ carers of babies and young children, providing access to existing to local support groups and facilities and support networks that exist within the local community.

Health

As noted in the previous response, the Council has sought engagement with the NHS as part of the preparation of the Village Clusters Housing Allocation Plan to understand existing constraints and potential opportunities that could arise for all groups within the community. With regards to access to physical services and facilities it is inevitable that many of these are focused within larger settlements and towns, often with smaller clinic and surgeries operating at a local level. Opportunities to expand existing NHS services via the provision of additional sites and facilities is not considered to be possible as part of the VCHAP, due to both the scale of development proposed on the sites being allocated as well as the wider availability of resources currently available within the NHS (the latter issue being recognised as a wider concern at a national level). Focussing development within larger settlements with a greater range of medical services and facilities available may have had an increased positive impact on this protected group when compared to the approach to growth taken in the Plan. In terms of the VCHAP however, a number of sites are allocated within settlements that benefit either from a medical practice being present (for example, VC MUL1 in Mulbarton) or are within in close proximity to settlements/ clusters that can offer the same.

The VCHAP has identified opportunities to enhance the public realm and access to the surrounding countryside via new connections to the existing Public Right of Way networks (PRoW). These connections will encourage recreational use of the countryside which can improve health and wellbeing, including that of those people identified as being within protected groups. Examples of allocated sites requiring new/ enhanced connectivity to the existing PRoW network include VC ALP1 (Alpington). VC BRO1 (Brooke), VC HAL1 (Hales) and VC ELL2 (Ellingham).

The Village Cluster Housing Allocation Plan will deliver a range of housing to meet local housing needs which it is anticipated will improve both the quality and the availability of the housing stock throughout the Plan area. This may have a positive impact on those people considered to have low-poor health by addressing issues that arise by virtue of overcrowding and sub-standard housing.

Place. Inc Rurality

Over 75% of South Norfolk's population live in rural areas and in recognition of this meeting the needs of these people effectively is vital to the ongoing success of these communities.

Whilst communities in rural and urban areas face many similar challenges that can range from housing to healthcare and education to employment, living within a rural environment can increase barriers to accessing services and facilities and present unique challenges to

overcoming them. In addition, whilst rural living presents also presents many opportunities in terms of health and wellbeing it can increase the sense of isolation that may be felt by residents, particularly in the absence of support networks and local facilities and services. An alternative strategy to the allocation of sites within the Plan area, the concentration of new housing on larger sites within larger settlements, would fail to meet the needs of the large proportion of the District's residents who live within the rural communities. This alternative approach to the distribution of growth could result in the continued loss of existing services, facilities and community support networks that are currently available at a local level within the villages as residents move to new housing in the larger villages and towns. The VCHAP has sought to address the barriers that have been identified where possible, noting however the limitations it faces due to the scale and type of development it proposes.

The improved connectivity promoted in site-specific policies, as well as new linkages to the existing Public Right of Way network, will aid in the integration of new housing developments into the existing community, as will the additional areas of open space required in compliance with existing Local Plan policy requirements. In addition to the standard requirements, new development at VC ASL1 (Aslacton) will facilitate the creation of a village green whilst VC BB1 (Barnham Broom) and VC WIC1 (Wicklewood) will create new focal points for the settlements through the provision of open space in gateway locations to these sites.

The Village Clusters Housing Allocation Plan is considered to have a neutral impact on protected groups, but it is anticipated that it will benefit those working in rural areas seeking local housing, or existing residents who are looking to up/downsize but remain local to their area. Residents relocating to these areas will also support the existing services and facilities, including community groups, education provision and local business, all of which are critically important in creating and maintaining a sense of local identity and a supportive community in a rural context.

Low Income and Poverty

The site-specific allocation policies are generally considered to have a positive impact on residents who are in poverty or have a low-income.

A key focus of the strategic policies set out in the GNLP is ensuring sites deliver an appropriate level of affordable housing to meet the needs of the resident population. In addition to this standard expectation, site specific policies in Great Moulton and Spooner Row have been prepared to secure the appropriate quantum of affordable housing based on previous/ recent developments that have been permitted on linked sites.

Connectivity to services and facilities can prove to be a barrier to people on a low income or in poverty within the rural area. The site assessment process included a consideration of the availability and accessibility of the public transport network locally, as well as the distance of sites from existing services and facilities. It is recognised that in some locations access to public transport is limited and, as is typical in rural areas, there will inevitably be a reliance on private modes of transport which may negatively impact on low income households.

Summary of Impacts

The Village Clusters Housing Allocation Plan has a clear opportunity to promote the equality of opportunity, and enhance community cohesion, within the village clusters of South Norfolk. It is anticipated that this will benefit people within the following protected characteristic groups: age, disability and pregnancy and maternity and will also have a

positive impact on those people who fall within the additional groups the Council has identified as being at potential risk of exclusion: health, place (specifically rurality) and those with a low income or in poverty.

Wherever possible the Council has allocated sites that are well located and accessible to existing services and facilities, adjacent to existing established communities. This promotes a social cohesion within these communities, providing opportunities for support networks to be developed and a sense of community to result.

Many of the sites allocated are expected to improve local connectivity through improvements to the existing pedestrian footpaths, linkages into the Public Rights of Way network and informal footpath improvements. This will be to the benefit of all people in the identified protected groups, as well as the wider community. Site specific requirements for education facilities, as well as the provision of open space and connections to existing village halls, will be of benefit to all age groups, as well as those identified as being within protected characteristics.

The housing mix required at a strategic level and delivered at a local level via the VCHAP will benefit those groups of people who perhaps require specialist housing, including affordable housing, but it will also improve the diversity and quality of the housing stock throughout the Plan area.

Inevitably an assessment of the Plan has identified that tensions do exist and it is not always possible via the VCHAP to have a positive impact for all protected groups. Most notably, it is recognised that the allocation of sites across a rural area presents some challenges around providing access to a full range of services and facilities that the residents within these protected groups may require. An alternative distribution of sites that focusses development on larger sites primarily in those settlements with a greater number of services and facilities would have addressed, at least in part, this constraint. However, in taking this approach the VCHAP would miss an opportunity to support a diverse range of services over a wider geographical area, many of which are considered to be important to the existing communities in the Plan area. Such an approach would also miss opportunities to strengthen and/or develop social cohesion within rural communities, possibly resulting in a deterioration of existing support networks and community groups.

Finally, the Plan is one element of a wider growth strategy for new housing development and infrastructure throughout the Greater Norwich area, and as such whilst it is correct to assess the impact of this Plan as a standalone document, it should also be considered holistically within the context of the opportunities that this wider growth will provide.

Conclusion

This EqIA has examined whether the Village Cluster Plan has an impact (positive/negative) on-different groups within the community. The assessment identified that the Objectives and site-specific housing allocations are likely to have either a positive impact, or no differential impact on the different protected characteristics, having sought to make improvements to the existing context wherever possible, and that the scale and type of land use proposed via the VCHAP should also be considered within the context of the wider allocations, and growth, set out in the Greater Norwich Local Plan.

Appendix 1: Equalities Profile for South Norfolk District

Population by gender

This dataset shows the resident population by gender across the last two Censuses.

South Norfolk Local Authority 2011	Number	%
All usual residents	124,012	100.0
Males	60,515	48.8
Females	63,497	51.2
Lives in a household	122,219	98.6
Lives in a communal establishment	1,793	1.4

2011 Census ONS Crown Copyright Reserved [from Nomis 26 April 2021]

South Norfolk Local Authority 2021	Number	%
All usual residents	141,947	100.0
Males	69,238	48.8
Females	72,709	51.2
Lives in a household	140,165	98.7
Lives in a communal establishment	1,783	1.3

2021 Census ONS Crown Copyright Reserved [from Nomis 14 December 2022]

Population projections for all persons by year

The projections below take population estimates as their starting point.

Year	South Norfolk	Norfolk	England
2027	156,807	958,978	58,527,723
2032	164,190	983,735	59,592,225
2037	170,390	1,005,408	60,571,681
2042	176,032	1,025,829	61,549,624

2018 Population Projections ONS Crown Copyright Reserved [from Nomis 15 December 2022]

Age structure

This dataset shows the resident population by broad age groups as in 2021

South Norfolk Local Authority	Number	%
All usual residents	141,948	100.0
Aged 4 years and under	6,989	4.9
Aged 5 to 9 years	8,107	5.7
Aged 10 to 15 years	9,632	6.8
Aged 16 to 19 years	5,346	3.8
Aged 20 to 24 years	5,977	4.2
Aged 25 to 34 years	15,473	10.9
Aged 35 to 49 years	26,052	18.4
Aged 50 to 64 years	29,861	21.0
Aged 65 to 74 years	17,885	12.6
Aged 75 to 84 years	11,925	8.4
Aged 85 years and over	4,701	3.3

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Sexual orientation and gender reassignment

Data on sexual orientation and gender reassignment is not available at a District Level. In 2020, an estimated 3.1% of the UK population aged 16 and over identified themselves as lesbian, gay or bisexual (LGB) (Source: Office for National Statistics).

Marital and civil partnership status

This dataset shows the resident population by marital status across the last two Censuses.

South Norfolk Local Authority 2011	**Number**	**%**
All usual residents aged 16+	101,717	100.0
Single (never married or never registered a same-sex civil partnership)	25,795	25.4
Married	56,458	55.5
In a registered same-sex civil partnership	257	0.3
Separated (but still legally married or still legally in a same-sex civil partnership)	2,223	2.2
Divorced or formerly in a same-sex civil partnership which is now legally dissolved	9,528	9.4
Widowed or surviving partner from a same-sex civil partnership	7,456	7.3

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South Norfolk Local Authority 2021	**Number**	**%**
All usual residents aged 16+	117,219	100.0
Single (never married or never registered a same-sex civil partnership)	34,193	29.2
Married	60,357	51.5
In a registered same-sex civil partnership	293	0.3
Separated (but still legally married or still legally in a same-sex civil partnership)	2,363	2.0
Divorced or formerly in a same-sex civil partnership which is now legally dissolved	12,006	10.2
Widowed or surviving partner from a same-sex civil partnership	8,007	6.8

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English language proficiency

Population by English language skills in 2021

South Norfolk Local Authority	Number	%
All usual residents aged 3 years and over	137,981	100.0
Main language is English	134,429	97.4
Main language is not English	3,552	2.6
Main language is not English: Can speak English very well	1,964	1.4
Main language is not English: Can speak English well	1,090	0.8
Main language is not English: Cannot speak English well	417	0.3
Main language is not English: Cannot speak English	81	0.1

2021 Census ONS Crown Copyright Reserved [from Nomis 15 December 2022]

Ethnic group

This dataset shows the percentage of population by ethnic groups across the last two Censuses.

South Norfolk Local Authority 2011	Number	%
All usual residents	124,012	100.0
White	120,981	97.6
English/Welsh/Scottish/Northern Irish/British	117,998	95.2
Irish	455	0.4
Gypsy or Irish Traveller	183	0.1
Other White	2,345	1.9
Mixed/multiple ethnic groups	1,214	1.0
White and Black Caribbean	313	0.3
White and Black African	179	0.1
White and Asian	422	0.3
Other Mixed	300	0.2
Asian/Asian British	1,270	1.0
Indian	433	0.3
Pakistani	64	0.1
Bangladeshi	60	0.0
Chinese	325	0.3
Other Asian	388	0.3
Black/African/Caribbean/Black British	378	0.3
African	259	0.2
Caribbean	68	0.1
Other Black	51	0.0
Other ethnic group	169	0.1
Arab	70	0.1
Any other ethnic group	99	0.1

2011 Census ONS Crown Copyright Reserved [from Nomis 26 April 2021]

South Norfolk Local Authority 2021	Number	%
All usual residents	141,948	100.0
Asian, Asian British or Asian Welsh	2,562	1.8
Asian, Asian British or Asian Welsh: Bangladeshi	150	0.1
Asian, Asian British or Asian Welsh: Chinese	552	0.4
Asian, Asian British or Asian Welsh: Indian	977	0.7
Asian, Asian British or Asian Welsh: Pakistani	133	0.1
Asian, Asian British or Asian Welsh: Other Asian	750	0.5
Black, Black British, Black Welsh, Caribbean or African	1,164	0.8
Black, Black British, Black Welsh, Caribbean or African: African	866	0.6
Black, Black British, Black Welsh, Caribbean or African: Caribbean	163	0.1
Black, Black British, Black Welsh, Caribbean or African: Other Black	135	0.1
Mixed or Multiple ethnic groups	2,094	1.5
Mixed or Multiple ethnic groups: White and Asian	745	0.5
Mixed or Multiple ethnic groups: White and Black African	369	0.3
Mixed or Multiple ethnic groups: White and Black Caribbean	391	0.3
Mixed or Multiple ethnic groups: Other Mixed or Multiple ethnic groups	589	0.4
White	135,474	95.4
White: English, Welsh, Scottish, Northern Irish or British	130,292	91.8
White: Irish	519	0.4
White: Gypsy or Irish Traveller	150	0.1
White: Roma	72	0.1
White: Other White	4,441	3.1
Other ethnic group	654	0.5
Other ethnic group: Arab	145	0.1
Other ethnic group: Any other ethnic group	509	0.4

2021 Census ONS Crown Copyright Reserved [from Nomis 15 December 2022]

Religion

This dataset shows the percentage of the population by religion across the last two Censuses.

South Norfolk Local Authority 2011	Number	%
All usual residents	124,012	100.0
Has religion	78,904	63.6
Christian	77,234	62.3
Buddhist	364	0.3
Hindu	235	0.2
Jewish	126	0.1
Muslim	403	0.3
Sikh	49	0.0
Other religion	493	0.4
No religion	35,601	28.7
Religion not stated	9,507	7.7

2011 Census ONS Crown Copyright Reserved [from Nomis 26 April 2021]

South Norfolk Local Authority 2021	Number	%
All usual residents	141,950	100.0
No religion	62,982	44.4
Christian	67,308	47.4
Buddhist	524	0.4
Hindu	542	0.4
Jewish	197	0.1
Muslim	859	0.6
Sikh	57	0.0
Other religion	664	0.5
Not answered	8,817	6.2

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Health and provision of unpaid Care

This dataset shows the percentage of people (2011) that have a limiting long-term illness, number of people who provide unpaid care for others and the number of hours provided and persons health rating.

South Norfolk Local Authority	Number	%
All usual residents	124,012	100.0
Day-to-day activities limited a lot	9,238	7.4
Day-to-day activities limited a little	13,002	10.5
Day-to-day activities not limited	101,772	82.1
Day-to-day activities limited a lot: Age 16 to 64	3,324	2.7
Day-to-day activities limited a little: Age 16 to 64	5,404	4.4
Day-to-day activities not limited: Age 16 to 64	66,466	53.6
Very good health	57,480	46.4
Good health	44,400	35.8
Fair health	16,575	13.4
Bad health	4,297	3.5
Very bad health	1,260	1.0
Provides no unpaid care	110,192	88.9
Provides 1 to 19 hours unpaid care a week	9,604	7.7
Provides 20 to 49 hours unpaid care a week	1,482	1.2
Provides 50 or more hours unpaid care a week	2,734	2.2

2011 Census ONS Crown Copyright Reserved [from Nomis 26 April 2021]

Disability living allowance

Data on disability living allowance is not available at a District Level. As of November 2018, 22,660 people across Norfolk were claiming disability living allowance (Source: Nomis 15 December 2022).

Earnings by place of residence

Median earnings in pounds for employees living in the area (March 2021)

Gross Weekly Pay	South Norfolk (£)	East (£)	Great Britain (£)
Full-Time Workers	586.5	604.8	587.1
Male Full-Time Workers	624.0	646.4	622.9
Female Full-Time Workers	532.7	550.5	544.3
Hourly Pay - Excluding Overtime	**South Norfolk (£)**	**East (£)**	**Great Britain (£)**
Full-Time Workers	15.02	15.38	15.18
Male Full-Time Workers	15.44	16.01	15.64
Female Full-Time Workers	13.96	14.65	14.42

2021 Annual survey of hours & earnings ONS Crown Copyright Reserved [Nomis 26 April 2021]

Median earnings in pounds for employees living in the area (December 2022)

Gross Weekly Pay	South Norfolk (£)	Norfolk (£)	England (£)
Full-Time Workers	619.0	600.0	645.8
Male Full-Time Workers	657.3	630.3	690.0
Female Full-Time Workers	532.5	536.6	584.5
Hourly Pay - Excluding Overtime	**South Norfolk (£)**	**Norfolk (£)**	**England (£)**
Full-Time Workers	14.82	14.60	16.42
Male Full-Time Workers	15.25	14.94	17.04
Female Full-Time Workers	13.83	13.62	15.44

2022 Annual survey of hours & earnings ONS Crown Copyright Reserved [Nomis 15 December 2022]

Out-Of-Work Benefits

Under Universal Credit a broader span of claimants is required to look for work than under Jobseeker's Allowance. As Universal Credit Full Service is rolled out in particular areas, the number of people recorded as being on the Claimant Count is therefore likely to rise. Percentages in the tables below are claimant numbers as a proportion of residents aged 16-64 – not seasonally adjusted.

	South Norfolk (#)	South Norfolk (%)	East (%)	Great Britain (%)
All People	3,030	3.7	5.6	6.5
Males	1,680	4.2	6.5	7.7
Females	1,350	3.2	4.7	5.0

2011 Claimant count ONS Crown Copyright Reserved [from Nomis 28 April 2021]

Nov 2021	South Norfolk (#)	South Norfolk (%)	Norfolk (%)	England (%)
All People	1,665	2.0	2.7	3.7
Males	860	2.1	3.0	4.3
Females	805	1.9	2.4	3.2

2022 Claimant count ONS Crown Copyright Reserved [from Nomis 15 December 2022]

Household deprivation

Area	South Norfolk	South Norfolk	South Norfolk	South Norfolk	South Norfolk	East of England	East of England
IMD	Not deprived on any dimension	Deprived on 1 dimension	Deprived on 2 dimensions	Deprived on 3 dimensions	Deprived on all 4 dimensions	Not deprived on any dimension	Deprived on 1 or more dimensions
Urban	**3,075**	**4,009**	**2,626**	**595**	**52**	**503,710**	**1,045,520**
Rural	**11,754**	**13,947**	**8,615**	**1,786**	**141**	**234,574**	**448,212**
Less Sparse	11,754	13,947	8,615	1,786	141	225,574	419,404
Town	4,379	5,640	3,685	679	52	104,454	201,479
Village	5,281	6,032	3,749	832	61	91,914	166,962
Dispersed	2,094	2,275	1,181	275	28	29,439	50,963

2011 Census ONS Crown Copyright Reserved [from Nomis 28 April 2021]

South Norfolk	**Number**	**Percentage**
All households	61,382	100.0
Household is not deprived in any dimension	31,718	51.7
Household is deprived in one dimension	21,228	34.6
Household is deprived in two dimensions	7,114	11.6
Household is deprived in three dimensions	1,261	2.1
Household is deprived in four dimensions	61	0.1

2021 Census ONS Crown Copyright Reserved [from Nomis 15 December 2022]

Rurality

South Norfolk	**Male**	**Female**	**Total**
Urban	*11,475*	*12,203*	*23,678*
Rural	*42,378*	*44,654*	*87,032*
Less Sparse	42,378	44,654	87,032
Town	15,716	17,122	32,838
Village	19,201	19,943	39,144
Dispersed	7,461	7,589	15,050
Total	53,853	56,857	110,710
Percentage Rural	78.7	78.5	78.6

2011 Census ONS Crown Copyright Reserved [from Nomis 28 April 2021]

Agenda Item: 7
Cabinet
9 January 2023

To establish and enter into a joint venture to deliver a programme of mitigation for nutrient neutrality

Report Author(s): Phil Courtier
Director of Place
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phil.courtier@southnorfolkandbroadland.gov.uk

Portfolio: Stronger Economy

Ward(s) Affected: All

Purpose of the Report:
Currently planning applications for new overnight accommodation are on hold in many parts of the district due to the nutrient neutrality constraints that were imposed by Natural England in March 2022.

The report contains details of how this constraint will be overcome through the establishment of a Joint Venture which will source the mitigation that is required to get the housing market moving and sell credits to developers to enable them to demonstrate housing schemes are nutrient neutral.

The Joint Venture would be established with the potential to provide a range of environmental credits, initially focussing on nutrient neutrality.

Recommendations:
Cabinet agree to

1. Enter a Joint Venture (a company limited by guarantee) with Anglian Water and one or more local authorities in Norfolk for the provision of environmental credits (initially focussing on addressing nutrient neutrality) as per the attached Heads of Terms.

2. To commit £30,000 revenue in 2023/24 as part of establishing the Joint Venture. The purpose of the funding being to establish the operating model in year one, after which there will be full recovery of the operating costs as part of the credit income.

3. Delegate to the Director of Place in consultation with the Leader of the Council to finalise the details of the joint venture agreement and operating arrangements and enter the Joint Venture.

1. Summary

1.1 On the 16 March 2022 Natural England wrote to seventy-four local authorities and advised them, as the Competent Authority under the Habitats Regulations, to carefully consider the nutrients impacts of any new plans and policies (including new development proposals). In Norfolk, the two Special Areas of Conservation (SACs) that need to be protected from rising nutrient levels are the River Wensum and the Broads.

1.2 Consequently, planning applications for new overnight accommodation are on hold in many parts of the district awaiting developers to come forward with planning applications that demonstrate there will be no further adverse levels of nutrients (phosphorus and nitrogen) reaching the SACs because of their respective housing proposal.

1.3 Whilst some of the volume housebuilders will be able to provide the mitigation required (through for example constructed wetlands) this will not be possible for many of the small and medium sized developers. With small and medium sized developers making up around 40% of the homes delivered in Norfolk this creates a significant barrier.

1.4 There is also an impact on the Council's growth ambitions for the district alongside social and economic impacts, for example addressing housing need and future loss of income for council services.

1.5 The impact of the nutrient neutrality requirements has been significant for Breckland Council, Broadland District Council, Norwich City Council, North Norfolk District Council and South Norfolk Council and therefore it is proposed that the authorities work together to identify a solution.

1.6 Anglian Water is also affected by nutrient neutrality and the government has indicated that the performance of wastewater treatment plants also must improve by 2030. An amendment to the Levelling Up and Regeneration Bill was proposed on the 18 November 2022, which if adopted is expected to reduce the mitigation requirement for phosphorus by 36% and nitrogen by 65% post 2030. Anglian Water has significant expertise at a strategic level in water management and treatment which the Council does not have and a direct link into all the households in Norfolk. This will be essential in providing some of the solutions within the portfolio of mitigation.

1.7 The report sets out the work to date and a range of options that have been considered.

2. Background

2.1 On the 16 March 2022 Natural England issued new guidance to local planning authorities concerning nutrient enrichment and the role it must play in preventing further adverse impacts to protected wetland habitats.

2.2 This guidance covered the catchment areas of the River Wensum Special Area of Conservation (SAC) and the Broads Special Area of Conservation and RAMSAR. This impacted all the local authorities in Norfolk, either through wastewater discharge or surface water flows running into the River Wensum SAC or Broads SAC. Although Kings Lynn and West Norfolk District Council and Great Yarmouth Borough Council have indicated nutrient neutrality requirements will have a minimal impact.

2.3 Local Planning Authorities (LPA) are required to consider the impact of nutrient enrichment before planning permission can be granted and therefore all planning applications (including new applications, reserved matters and with those with outstanding conditions), primarily involving increases to overnight stay were temporarily put on hold. Some of these applications have now been released, although most are still in abeyance.

2.4 The Council is the Competent Authority for planning decisions; however, the habitats legislation requires that sites that are in the catchments of the Wensum SAC and Broads SAC will only be granted planning permission when there is certainty around levels of enrichment and corresponding mitigation. If that certainty is not proven beyond reasonable the LPA is not legally allowed to grant permission and Natural England has made it clear it will also oppose any deviation to the legal framework.

2.5 A Written Ministerial Statement on nutrient neutrality was published on 20 July 2022 and Defra issued a Direction to Natural England on strategic mitigation schemes on 28 July 2022. The Secretary of State directed Natural England to “take the steps that they have proposed and that are within their control to prepare, facilitate and administer the operation of strategic mitigation schemes in any or all the catchments where at the date of this direction there are restrictions on development because of concerns in relation to nutrient pollution.”

2.6 It is understood that Natural England will only provide a scheme and nutrient neutrality credits on nature and land-based solutions such as wetlands and woodlands, which by their nature will be medium to long term solutions. This will also not deliver sufficient capacity for the growth agenda in the catchments.

2.7 This is a complex and complicated scenario with a range of external factors influencing the approach alongside the immediate local challenges. Member

briefings have taken place during the Autumn to share the context, challenges, and approach, these were well attended.

2.8 The focus of this report is to put in place an arrangement to source and deliver the required mitigation. The content covers how the arrangements will be governed, the report is not intended to cover all the aspects and details of nutrient neutrality or the provision of other environmental credits.

3. Current position/findings

3.1 The authorities in Norfolk all have growth aspirations which are predicated on providing housing as part of their place shaping agenda. Meeting the nutrient neutrality requirements will place further pressure on viability and developer contributions which are also supporting wider economic, environmental, and social improvements. This includes transport infrastructure, affordable housing and improving connectivity which all impact on wider economic growth. In addition, the government has targets for additional housing in these authorities which are all now under threat.

3.2 Without swift action to mitigate nutrient neutrality there is a risk that developers will submit predatory applications for schemes which lie outside the relevant catchment area and the plan-led approach to the growth agenda will eroded. The government has previously stated that it will issue further guidance on how the 5-year land supply will be assessed in areas which are subject to nutrient neutrality, but this guidance is still awaited.

3.3 Many of the developers in Norfolk are small and medium sized organisations and they do not have capacity to install their own nutrient neutrality solutions. Many will have already purchased land or have options on sites. There is a significant risk that many of these small and medium sized enterprises will go out of business if the granting of new planning permissions in these catchments does not get moving soon.

3.4 It is estimated that between 1,750 and 2,200 homes per year are currently on hold across Norfolk due to the nutrient neutrality constraints. In addition, there is a significant backlog of applications that were halted on the 16 March 2022.

3.5 Natural England recently provided an update on progress with their credits-based system. However, there is no mitigation identified in Norfolk at this stage (and therefore no credits available). Natural England is still looking for potential solutions with the aim of providing credits by the end of March 2023.

3.6 The Norfolk planning authorities have been working together since March 2022 to look at the mitigation requirement and potential solutions. On the former Royal Haskoning has been commissioned and is working with the Norfolk councils to look at calculating the mitigation need, the locations where nutrient neutrality would apply and potential solutions.

3.7 The authorities have also been looking at how mitigation could be delivered on specific sites and have been discussing options and advising developers, landowners and potential providers.

3.8 Learning has also been taken from authorities that have been subject to nutrient neutrality for several years to look at the options and bringing forward proposals as swiftly as possible. It should be noted that many of the early authorities that were affected have taken 2 to 3 years to get their schemes operational.

4. Proposed action

4.1 The proposed way forward is to establish a Joint Venture company. The purpose of the Joint Venture would be to enable developers to purchase environmental credits to cover the additional enrichment load that has been calculated for their site.

4.2 The Joint Venture company would secure mitigation and then issue certificates confirming the credits that had been purchased. Developers would then submit the certificates with their planning applications.

4.3 The Joint Venture would comprise of Anglian Water and several of the local authorities. It is estimated that the offer from the company would capture 40% of the nutrient neutrality market. Noting some developers will have the capacity and space to develop their own nutrient neutrality solutions on site.

4.4 This solution will provide housing developers in the catchments with certainty around the delivery of the mitigation required. It is not anticipated that the Joint Venture will be a direct provider of mitigation solutions itself.

4.5 The operating model would sit alongside what Natural England provides on nature and land-based solutions. Recognising some landowners may prefer to work with the partnership on nature and land-based solutions rather than Natural England and vice versa.

4.6 It is expected that other commercial providers will also enter the nutrient neutrality market in due course.

4.7 There would be an informal reporting link into the Leaders through the Norfolk Strategic Planning Forum.

4.8 This action would enable the growth ambition across Norfolk to proceed through the delivery of additional overnight accommodation and help in addressing the demand for additional housing. Unlocking the new homes that are currently on hold by establishing an environmental credits model focussing on nutrient neutrality by March 2023.

4.9 The immediate level of benefit to the housing market will be determined by the level of mitigation that can be implemented, particularly in the short term. It is anticipated that it will take some time to secure the mitigation required to address

all the backlog and new planning applications that come forward during 2022/23 and 2023/24.

5. Other options

5.1 Several other options have been considered as part of responding to the nutrient neutrality situation, these are set out in the following section.

5.2 Option 1 - To require Natural England to produce the whole nutrient neutrality solution for Norfolk. The government has said Natural England need to oversee the nutrient credit arrangements; Natural England has subsequently said that they will focus on the nature and land-based solutions. This option is not recommended as a way forward for the Council. A mixed economy of mitigation will need to be delivered to meet the requirements. Any nature-based solutions are also unlikely to be operational in the short term and Natural England will only be able to meet a portion of the nutrient requirement.

5.3 Option 2 - To pass responsibility to some other third party or investment vehicle to run a credit-based scheme for developers to access. For example, something like EnTRADE (providing online markets to help buyers and sellers (farmers) find the best value deals for environmental improvement), this would be a profit-making organisation. This is not recommended as a way forward for the Council. The preference is for the planning authorities to have some control over the nutrient credits process and allocation as part of place shaping and supporting the market (particularly small and medium sized organisations). Recognising it is likely other nutrient neutrality providers will enter the marketplace in due course.

5.4 Option 3 - Do nothing. Allowing the market to develop credits themselves alongside the Natural England nature and land-based offer. Developers can trade between themselves and develop their own mitigation plans. This is not recommended as a way forward for the Council. There is no indication of how long this would take to become established and many of the developers are small and medium sized enterprises that will not be able to develop their own solutions. It is likely other providers will enter the market and will be profit making, however, this will take time and reduce the funds available from each scheme for other aspects such as affordable housing.

6. Indicative timescales

6.1 The initial planning phase of the Programme will run through to March 2023 when, subject to agreement, the Joint Venture will be established.

6.2 At this stage (subject to council agreement) it is envisaged that Breckland Council, Broadland District Council, Norwich City Council, North Norfolk District Council, South Norfolk Council and Anglian Water will enter the Joint Venture. All the parties will be considering reports in December 2022 and January 2023.

6.3 The aim is to have the governance up and running by March 2023, alongside developing some short-term mitigation solutions.

7. Issues and risks

Both a Risk Register (things that may happen) and Issues Register (things that have or will happen) exist as part of the programme planning. The main identified risks are:

a. Change in Government Policy towards nutrient neutrality meaning the mitigation is reduced or no longer required which would impact on the business model.

b. Natural England not being able to establish an effective and timely Norfolk wide P (phosphorus) credit and N (nitrogen) credit system requiring more credits from the Joint Venture to support the planned growth.

c. Anglian Water not meeting the government highest technically achievable limits (TAL) by 2030 at larger wastewater treatment works, requiring more credits. Noting that TAL is dependent on legislation and an update to the Levelling Up and Regeneration Bill.

d. Small and medium sized developers being squeezed out of the market and go out of business along with local builders if an accessible mitigation solution cannot be established.

e. Delay in the Government legislation and guidance including the Levelling Up and Regeneration Bill causing delay in sites coming forward for mitigation

f. The cost of credits cannot be established in a creditable way ahead of knowing the full cost of the mitigation scheme(s)

7.1 <u>Issues (Critical ones)</u>

a. The need to identify a portfolio of short-term mitigation to enable planning applications to be considered and determined and new homes delivered.

b. Clarifying the rules that apply to the accreditation of any mitigation.

7.2 **Resource Implications**

7.3 Initial revenue funding of £30,000 is required from the Council for 2023/24 to establish the Joint Venture. Annual operating costs have been estimated at £300,000, with a 50:50 split between Anglian Water and the local authorities. Therefore, with five local authorities indicating they wish to be a part of the joint

venture it would be £30,000 each. Provision will need to be made in the 2023/24 budget.

7.4 In addition, £150,000 seed revenue funding is required to help expedite the establishment of the Joint Venture. This revenue is currently being sought solely from Broadland District Council as a loan and will be repaid as the Joint Venture starts trading.

7.5 Once the Joint Venture is operational and credits are sold it is anticipated that the revenue costs associated with the future running costs would be met as part of the developer contributions.

7.6 An officer representative from the Council would become a member director of the Joint Venture and then a Board would be drawn from the member directors. Decision making on the most important matters would rest with the member directors. Board members may also be Executive directors that are appointed to oversee the day-to-day arrangements. Further details are set out in the draft Heads of Terms (See Appendix 1).

7.7 The Joint Venture company would employ a small team of staff, a programme lead/general manager to run the company on a day-to-day basis and a separate support role to oversee, monitor and track arrangements and agreements.

7.8 There are implications for local businesses as many are directly and indirectly related to the housing market. The pipeline of work is reducing for builders, electricians, plumbers etc, agents and developers will also see options on land running out, particularly on smaller and medium sized sites where local mitigation is not possible.

7.9 There are also short-term financial implications for the Council in terms of a loss in planning fees and in the longer-term council tax income. At best housing development is on hold, however, with the delays some housing development may well not come forward at all, seriously impacting on the growth aspirations for the area.

7.10 **Legal Implications**

7.11 Legal advice has been sought on several governance models through external advisors (Birketts LLP) and each of the working options was considered by officers in November 2022. The options explored were as follows:-

- A Joint Venture Company Limited by Shares
- A Joint Venture Company Limited by Guarantee
- Contractual arrangements using Council in-house powers
- A Limited Liability Partnership

7.12 Further details on each of the options are available in a background document. The preferred option was a joint venture company limited by guarantee. This was influenced by:-

(a) a desire to show this was not about making profit out of nutrient neutrality - particularly when funding for affordable housing and other infrastructure is being squeezed
(b) the fact that the liability on each of the parties is limited and
(c) there is a constraint for Anglian Water (given their funding base and operational arrangements) to pursue this model rather than a profit-making vehicle

7.13 Following an initial meeting with lead officers from all the potential parties on 15 November a draft Heads of Terms document was produced by Birketts. This has been reviewed by all the parties and is set out in Appendix 1 to this report.

7.14 **Equality Implications** – None

7.15 **Environmental Impact**

7.16 The proposal will have a significant impact on the environment in establishing a Joint Venture that will provide mitigation to initially stop the nutrient enrichment arising from new overnight accommodation worsening the water quality in the Wensum SAC and Broads SAC and provide headroom for development to proceed.

7.17 In due course it is envisaged that Biodiversity Net Gain (due to become a requirement in November 2023), carbon credits and potentially water neutrality measures could be delivered through the Joint Venture.

7.18 **Crime and Disorder** – None

7.19 **Other Risks**

There is a reputational risk for the Council. A Joint Venture between Anglian Water and the councils provides a trusted brand that developers can be confident in. However, whilst the risk has been assessed as low there could be a reputational risk for the Council if the Joint Venture ran into difficulties.

8 Conclusion

8.1 Protecting the natural environment in our rivers and Special Areas of Conservation remains a priority. However, the nutrient neutrality constraints that have been placed on the council present a huge barrier to growth and addressing some the wider social and economic challenges.

8.2 A solution needs to be found swiftly that meets the local requirements without creating a further uncertainty across the wider region.

8.3 The proposed Joint Venture with Anglian Water and the other local authorities that have been significantly affected by nutrient neutrality will enable the hold on many planning applications to be released in the short term.

9 Recommendations

9.1 Cabinet agree to

1. Enter a Joint Venture (a company limited by guarantee) with Anglian Water and one or more local authorities in Norfolk for the provision of environmental credits (initially focussing on addressing nutrient neutrality) as per the attached Heads of Terms.

2. To commit £30,000 revenue in 2023/24 as part of establishing the Joint Venture. The purpose of the funding being to establish the operating model in year one, after which there will be full recovery of the operating costs as part of the credit income.

3. Delegate to the Director of Place in consultation with the Leader of the Council to finalise the details and enter the joint venture arrangement.

Appendices

1. Draft Heads of Terms

Background papers

Assessment of potential governance models by Birketts LLP

NORFOLK ENVIRONMENTAL CREDITS LIMITED

Members' Agreement / Articles of Association - Term Sheet

No.	Term	Proposal
1.	**Company Name**	NORFOLK ENVIRONMENTAL CREDITS LIMITED
2.	**Trading Name**	Same as registered name – see above.
3.	**Type**	Company limited by guarantee
4.	**Registered office address**	c/o Birketts LLP, Kingfisher House, 1 Gilder's Way, Norwich NR3 1UB
5.	**Financial Year**	12 months from the month end when the company is registered
6.	**Business of the JV Co**	The JV Co will: - buy environmental mitigation and sell environmental credits - provide an effective portfolio of projects to help mitigate the impact of nutrient enrichment arising from additional housing development; - oversee the creation, accreditation and monitoring of a range of large-scale mitigation measures; - work with local authorities who will be the "Competent Authority" under The Conservation of Habitats and Species Regulations 2017 for the purposes of nutrient neutrality - Work with organisations who are acting as the "Responsible Body" under the Environment Act 2021 for the purposes of biodiversity net gain, including ensuring "Conservation Covenants" and the means of enforcing them are in place, if necessary; and - source and deliver other environmental credits as and when opportunities arise in the future.

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7.	**Business Plan**	Each year the JV Co shall produce an annual business plan, a draft of which shall be circulated at least 2 months prior to the start of the next financial year.
8.	**Membership guarantee**	Each member shall give a guarantee of £1.
9.	**Members**	(1) Anglian Water x5 Local Authorities: (2) South Norfolk Council (3) Breckland Council (4) North Norfolk District Council (5) Broadland District Council (6) Norwich City Council
10.	**Membership voting**	When decisions are put to the members: - Anglian Water shall be entitled to the same number of votes as the number of local authority (LA) members. - Each LA shall be entitled to 1 vote.
11.	**Initial funding**	2022/23: initial revenue seed funding of c£150k via a loan to be sourced, potentially from a single LA. 2023/24: Each member to make an initial revenue loan to the JV Co as follows: (1) Anglian Water: £150k (2) South Norfolk Council: £30k (3) Breckland Council: £30k (4) North Norfolk Council: £30k (5) Broadland District Council: £30k (6) Norwich City Council £30k Term of loans tbc but, will need to be on arms' length terms: - Loan amount: see above - Term: 1 year for initial revenue loan - Interest: no interest would be payable on the initial revenue loan, other loan arrangements

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		(including the seed funding) to be negotiated on a case-by-case basis. - Repayment: conditional upon the JV Co having sufficient funds Events of default: If the loan cannot be repaid in year one, repayment will be sought in future years. If the loan cannot be repaid the money would be written off. Further loans (including capital funding) may be made by any of the parties or third parties to the JV Co with terms to be agreed on a case-by-case basis by the members.
12.	**Future investments**	No member is required to make further loans in the JV Co
13.	**Directors**	Anglian Water shall have the right to appoint two directors. The Norwich based LAs (Broadland District Council, South Norfolk Council and Norwich City Council) shall have the right to appoint one director. The non-Norwich based LAs (i.e. North Norfolk District Council and Breckland Council) shall have the right to appoint one director. Each of the LA appointments shall be decided by a majority of the relevant LAs. Any member which does not have a director appointed shall be entitled to have an observer attend board meetings. A director will not be able to appoint an alternate. The appointment of any additional directors must be approved as set out in the Reserved Matters below. It is not anticipated that a Managing Director will be appointed at this stage.
14.	**Secretary**	Secretarial support will be sought for the duties / administration of the JV Co, including maintaining a current list of members and directors, this person will not be designated as a Company Secretary.

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15.	**Board Meetings**	Board meetings shall be held no less than 4 times per annum and no meeting shall take place more than 3 months after the previous meeting. Remote attendance permissible. It is envisaged that in the first year further Board meetings are going to be required. Third parties – including Natural England, Environment Agency, Department of Levelling Up, Housing and Communities representatives would also attend the Board by invitation for certain items.
16.	**Director voting powers**	Wherever possible a unanimous decision will be sought, thereafter decisions will be reached by majority. If voting is still tied the casting vote will rest with the local authority directors who are present.
17.	**Quorum**	Each board meeting shall be attended by: A majority of the directors (including at least one director appointed by Anglian Water).
18.	**Chairman**	Chairing of the Board meetings to oscillate between Anglian Water and a local authority representative on the Board. A chairman shall not be appointed in addition to the Directors referred to above. The chairman will agree the agenda and business for the Board. Any director shall be entitled to chair a board meeting. The chairman shall not have a casting vote.
19.	**Conflicts**	Each director shall be required to declare any conflicts he/she might have, both situational (i.e. each LA director will have an inherent conflict on the basis that nutrient neutrality impacts planning and any mitigation measure is intended to influence the LPA) and transactional (e.g. where AW is presenting a mitigation measure, the AW director(s) will be conflicted). Any director with a private, personal or direct financial conflict on an item shall declare it and be entitled to count in the quorum of a board meeting but not included in the discussion and vote itself on

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		any of the items where the private, personal or direct financial conflict exists.
20.	**Reserved Matters (requiring consent of members and/or board of directors)**	<u>Part 1 – matters requiring the consent of a majority (including AW) of the members:</u> - amending the JV Co's articles of association - altering any rights of membership - permitting registration of a new member otherwise than in accordance with the Members' Agreement or articles of association - the Credits Allocation Policy (CAP) setting out the criteria on which environmental credits will be allocated (and until such time as the CAP is agreed, no credits can be allocated) - the appropriate assessment of the mitigation to be provided - appointing/removing a director - approving the annual business plan <u>Part 2 – matters requiring the consent of a majority of the board including at least one AW director</u> - changing the JV Co's name / trading name(s) or registered office - ceasing to trade or changing the nature of the JV Co's business - conducting the business otherwise than in the ordinary course and on an arm's length basis - selling or disposing of the JV Co's business (whole or part) - entering into any contract above £500,000 and for any proposed contract of a value between £250,000 and £500,000, the board shall be notified with a one week notice period to call a vote to approve such contract - introducing any benefit plan for the directors/employees - employing anyone whose salary is greater than £50,000

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		- increasing remuneration of an employee above £5,000 - creating any encumbrance over the business - incurring borrowing above £500,000 - making any extraordinary loans - merging with or acquiring another company or business - entering into any form of insolvency procedure (e.g. administration, liquidation etc) - [others?]
21.	**Directors' pay**	No Directors of the company will be paid.
22.	**Dividend policy**	Dividends cannot be declared as the JV Co is limited by guarantee
23.	**Accountant / auditor**	The Company shall appoint an organisation to provide financial support, an accountant and auditor supplier(s) TBD
24.	**Tax**	The Company shall be liable to pay corporation tax on profits. Although it envisaged that the JV will not be making a profit, any surplus will be reinvested. The Company shall be liable to pay PAYE and employer NICS in respect of any employees.
25.	**VAT**	The Company shall [not] be registered for VAT and VAT shall [not] be charged on Environmental Credits sold. VAT position to be confirmed by specialist advisors]
26.	**Information rights**	Members will be provided with: - monthly management accounts - audited accounts no later than 4 months after the end of the relevant financial year -access to trading and financial information, books and records Final details to be confirmed as part of the contracted accountancy service.

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27.	**Membership transfers**	Membership shall be transferable only in specific circumstances: - members only permitted to transfer membership in accordance with the terms of the Members' Agreement and/or Articles of Association - membership may be transferred to any person with consent of all members - outgoing member ceases to have the right to appoint a director
28.	**Deed of adherence**	Any new member will be required to enter into a deed of adherence to be bound by the terms of the Members' Agreement
29.	**Membership termination**	A membership will be terminated in the following circumstances: - persistent/material of the Members' Agreement and/or Articles of Association - breach of restrictive covenant given in favour of the JV Co - if a member ceases to exist.
30.	**Drag and tag rights**	A minority member may be "dragged" (i.e. forced to sell its membership) if 80% or more of members wish to sell the JV Co If there is a change of control of the JV Co (i.e. 50% or more of the memberships are sold to a third party) a minority member should be able to "tag" along and receive the same offer for its membership]]
31.	**Intellectual property**	All intellectual property (IP) created by the JV Co shall belong to the JV Co. Anglian Water and the local authorities will have their own IP which they will bring into the JV Co and which will remain their property.
32.	**Restrictive covenants**	No member may have any involvement in a similar or competing business whilst they are a member and for 24 months thereafter

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33.	**Confidentiality**	Each member shall be subject to standard confidentiality provisions although they shall be permitted to share information internally and/or with other public authorities and government departments to the extent required in order to promote the success of the business and to progress developments around nutrient neutrality, biodiversity net gain and other environmental opportunities
34.	**Termination**	The Members' Agreement will terminate upon the following: - winding up of the JV Co - JV Co entering into insolvency procedures - an exit i.e. a sale or listing
35.	**Dispute Resolution / Deadlock**	In the event of a dispute arising between any of the members: - first, the members in dispute shall seek to resolve such dispute in good faith - second, member voting shall be applied in order to try to resolve the dispute, including the application of a casting vote, which would be based on the majority decision of the local authority members. - third, if the issue cannot be resolved and impacts on the JV Co then with the agreement of the parties the matter shall be referred to mediation
36.	**Winding Up**	On a solvent liquidation (members voluntary liquidation), the surplus assets (after first settling any outstanding liabilities including the repayment of member loans) shall be appointed to another business with a similar purpose, which is common for charity operating through a company limited by guarantee.
37.	**FCA Regulation**	Not to be progressed.
38.	**Procurement**	The JV Co will be required to comply with any procurement laws and regulations.

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39.	**OTHER**	None

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Agenda Item: 8
Cabinet
09/01/2023

DISS & DISTRICT NEIGHBOURHOOD PLAN REG. 16 CONSULTATION – ADDITIONS TO COUNCIL'S RESPONSE

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Portfolio: External Affairs and Policy; Stronger Economy

Ward(s) Affected: Diss and Roydon; Bressingham & Burston; Beck Vale, Dickleburgh & Scole

Purpose of the Report:

To agree that two additional representations from South Norfolk Council, in relation to the recent consultation on the submitted Diss and District Neighbourhood Plan, should be considered to be part of the formal Council response.

Recommendations:

It is proposed that Cabinet agree:

1. That the two representations detailed within Appendix 1 should be considered to be part of South Norfolk Council's formal response to the Reg. 16 consultation on the submitted Diss & District Neighbourhood Plan.

1 SUMMARY

1.1 Cabinet approved that the submitted Diss & District Neighbourhood Plan (DDNP) should proceed to the next stages of formal consultation followed by independent examination, at their meeting on 17th October 2022. The proposed representations from South Norfolk Council as part of the formal consultation were also approved at this meeting. The purpose of this report is to agree that two additional representations from South Norfolk Council, should be considered to be part of the formal consultation.

2 BACKGROUND

2.1 The DDNP and necessary supporting information was submitted to South Norfolk Council and Mid Suffolk District Council in July 2022.

2.2 At the Cabinet meeting on 17 October 2022, a decision was taken that the Neighbourhood Plan meets the requirements set out in Schedule 4B of the Town and Country Planning Act 1990 and that the plan should therefore proceed to consultation, in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, and subsequently to an independent examination.

2.3 Cabinet also approved (subject to minor modifications) a list of proposed representations from South Norfolk Council, to be submitted as part of the Reg. 16 consultation.

2.4 The Reg. 16 consultation, organised by South Norfolk Council and Mid-Suffolk District Council, took place between 2nd November and 16th December 2022. Stakeholder organisations and previous DDNP consultees were notified, and the consultation was publicised in the communities within the DDNP area.

2.5 The agreed South Norfolk Council response was submitted as part of this consultation.

3 CURRENT POSITION/FINDINGS

3.1 During the consultation period, officers determined that two proposed representations were inadvertently omitted from the proposed response. These representations are consistent with Council comments that have been made at previous stages of the plan making process.

3.2 Specifically, these representations relate to Policy 2 of the Neighbourhood Plan (‘Regeneration of the Waveney Quarter’) and Policy DDNP16 (‘The Feather Mills Site’).

3.3 The additional representations can be viewed in Appendix 1. In summary, the comments relating to Policy 2 note that the DDNP is relatively silent in respect of

the redevelopment of specific sites within the Quarter (including the bus station, the John Gross land etc.). The comments in relation to DDNP16 deal with the issue of whether there is sufficient evidence to support the DDNP's aspirations for this site and whether the policy is too restrictive.

3.4 As noted above, these reflect comments that have been made during previous consultation stages in relation to the Neighbourhood Plan. As the consultation period ended on 16th December, Officers have logged these two additional representations as part of the Council's response, following consultation with Portfolio Holders. A note has been added to these two particular representations, highlighting that they have been agreed in the interim by Officers and Portfolio Holders, but that they will be reported to Cabinet in due course.

3.5 An independent examiner has now been appointed to inspect the Neighbourhood Plan and this is set to commence in mid-January 2023. Any responses to the Reg. 16 consultation on the Neighbourhood Plan are submitted, along with the Neighbourhood Plan documents, to the examiner for them to consider in determining whether or not the Neighbourhood Plan meets the Basic Conditions as set out in legislation.

4 PROPOSED ACTION

4.1 It is proposed that Cabinet agrees to the two additional representations being confirmed as part of the Council's formal response, to sit alongside those that were previously agreed at the meeting on 17th October.

4.2 Should Cabinet agree to their confirmation, Officers will notify the appointed examiner and the Town Council that the additional comments have been formally confirmed by Cabinet.

5 OTHER OPTIONS

5.1 Cabinet can decide not to agree these two additional representations and advise the Examiner that they should not be considered to be part of the Council's formal response.

5.2 As the consultation has now ended it is not possible to make any material amendments or change the representations for submission to the examiner.

6 ISSUES AND RISKS

6.1 **Resource Implications** – There are no significant resource implications, above those raised in the report of 17th October, in approving these additional comments.

6.2 **Legal Implications** – Again, there are no significant resource implications, above those raised in the report of 17th October.

6.3 **Equality Implications** – There are no significant equalities implications associated with this proposal. A full Equality Assessment has been carried out in relation to the submitted plan.

6.4 **Environmental Impact** – The Neighbourhood Plan has been subject to a Strategic Environmental Assessment (SEA) and a Habitat Regulations Assessment (HRA).

6.5 **Crime and Disorder** – There are no significant risks associated with the matters covered in this report.

6.6 **Risks** – There are no significant risks associated with the matters covered in this report.

7 CONCLUSION

7.1 As discussed above, Officers are proposing that the two additional representations, as set out in Appendix 1, are agreed and that it is confirmed they should be considered part of the formal response previously agreed by Cabinet, in relation to the Reg. 16 consultation on the Diss & District Neighbourhood Plan.

8 RECOMMENDATIONS

8.1 It is proposed that Cabinet agree:

1. That the two representations detailed within Appendix 1 should be considered to be part of South Norfolk Council's formal response to the Reg. 16 consultation on the submitted Diss & District Neighbourhood Plan.

Appendix 1: DDNP Reg 16 Consultation South Norfolk Council response - additional representations

Background Papers

Diss & District Neighbourhood Plan submission documents

No.	Section	Response
21	Policy 2 – Regeneration of the Waveney Quarter (p.56)	The Council welcomes the inclusion of an overarching policy relating to the Waveney Quarter. The Council notes that the final policy is silent in respect of the Neighbourhood Plan group's aspirations for the quarter, including in respect of the re-use or re-provision of the bus station, redevelopment of the John Gross land and adjacent vacant building and improved links between Fair Green and the Waveney Valley. However, the Council accepts that the scope of the policy is to be determined by the Neighbourhood Plan group and does not consider that the omission of references to these considerations leads to a direct and significant conflict with the basic conditions.
22	Policy DDNP16 – The Feather Mills Site, Park Road, Diss (p.59)	The Council is concerned that the narrow definition of allowed uses may be detrimental to achieving the Neighbourhood Plan's overall aspirations for the Wensum Quarter. If the leisure centre is not relocated to this site it is unclear whether there is a need/demand for alternative leisure uses that would utilise a site of this size, and such evidence has not been found with the submission documents. As such, the Council is concerned that, whilst the allocation is positively worded, there is not proportionate evidence that it is deliverable in accordance with the requirements of paragraph 16(b) of the NPPF. The Council are of the opinion that the Policy should be broadened, allocating the site for leisure, housing and other commercial, business and service uses as defined with Class E of the Use Classes Order 1987 (as amended). This will help ensure that the policy does not act as a barrier to the appropriate redevelopment of this site and would also help create the conditions within which businesses can invest, expand and adapt in accordance with paragraph 81 of the NPPF.

Agenda Item: 9
Cabinet
9 January 2023

LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1976 TOWN POLICE CLAUSES ACT 1847 TAXIMETER TARIFF (TABLE OF FARES) CONSULTATION RESPONSES

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Portfolio: Clean and Safe Environment

Ward(s) Affected: All

Purpose of the Report:

This report details the results of a consultation exercise in respect of a proposed table of fares which will be applicable to any licensed hackney carriages from 1 April 2023. The draft table of fares and associated consultation responses are presented for Cabinet's consideration and subsequent adoption.

Recommendations:

Cabinet is **RECOMMENDED** to:

1. Consider the draft table of fares document.
2. Consider the responses received to the consultation exercise, and any consequent proposed amendments to the draft table of fares.
3. Agree the proposed table of fares for their adoption with a view to the agreed fares taking effect from 1 April 2023.

1. Summary

1.1 The Authority currently has in place a Hackney Carriage and Private Hire Vehicle Policy and Conditions document. This document was reviewed and consulted upon during 2021, with the final agreed Policy and Conditions taking effect from 1 April 2022.

1.2 A condition contained within the new document requires all licensed hackney carriage vehicles to be fitted with a taximeter:

"From 1 April 2023 the vehicle must be fitted with a taximeter and it shall not be used for hire unless such taximeter has been tested and approved by the Council or their authorised agents."

1.3 The byelaws adopted by the Authority state the following:

> "When the machinery of the taximeter is in action there shall be recorded on the face of the taximeter in clearly legible figures a fare not exceeding the rate or fare which the proprietor or driver is entitled to demand and take for the hire of the carriage by distance in pursuance of the byelaw in that behalf;" (Byelaw 4(c)).

1.4 South Norfolk Council therefore proposes the introduction of a table of fares to ensure compliance with previously adopted policy, vehicle licence conditions and byelaws.

1.5 The draft table of fares document and the responses received to the consultation process were presented to Licensing, Appeals and Complaints Committee on 21 November 2022 for their consideration and information. In line with the recommendation from the Committee, it was proposed to adopt the taximeter tariffs (table of fares) for hackney carriages, as proposed at Appendix One, with effect from 1 April 2023 or as early as practicable thereafter.

2. Background

2.1 Local authorities are required to have in place a taxi licensing policy to enable the Authority to carry out its functions relating to the licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators. The current Policy and Conditions document took effect from 1 April 2022.

2.2 Legislation allows South Norfolk Council to fix the rates or fares for time, distance and all other charges to be paid in respect of the hire of hackney carriages (a table of fares). The table of fares would be the maximum chargeable for the hire of the vehicle and drivers/proprietors would therefore not be prevented from charging less than the fare fixed by the Council.

2.3 There are no rates or fares fixed by South Norfolk Council in respect of the hire of hackney carriages at present.

2.4 In practice, the overwhelming majority of the country's licensing authorities have adopted a table of fares with a view to creating consistency and a level playing field for their local hackney carriage trade and to provide the public with protection from unscrupulous charging practices.

2.5 The two main elements within a table of fares are the charges set for the hire of a vehicle by time or distance or a combination of both. These charges, or the distance travelled / time elapsed, can be varied to account for hirings that take place on certain days or at certain times. For example, the charges for a hiring on a Sunday or at night may be higher than those on a weekday or during the day.

2.6 Any table of fares adopted must be displayed within a hackney carriage in accordance with South Norfolk Council hackney carriage byelaw number sixteen.

3. Current position/findings

3.1 By 1 April 2023 should there be any hackney carriages licensed by South Norfolk Council they will need to comply with the following policy regarding taximeters:

> "All Hackney Carriage vehicles require a calendar controlled and sealed tariff taximeter capable of complying with relevant legislation. Taximeters will be connected to the roof sign. Once the meter is started, the roof sign 'For Hire' notice will extinguish."

3.2 The purpose of a sealed calendar controlled taximeter is that the charges contained in the table of fares for time and distance on specific days and times of day, can all be pre-programmed within the meter by the meter manufacturer or their authorised agent. This means that a driver only need switch from 'for hire' to 'hired' and the taximeter will automatically select the correct rate for the hire of the hackney carriage based upon the day or time of day of the hiring.

3.3 Using this type of taximeter removes any potential errors of incorrect tariff selection by the driver.

3.4 It should also be noted that taximeters must comply with the South Norfolk Council hackney carriage byelaws, specifically byelaw number four on their construction, attachment and maintenance. The full text of the Dual Hackney Carriage & Private Hire Driver Licence Conditions and Byelaws, can be found in the recently adopted Hackney Carriage and Private Hire Vehicle Policy and Conditions (accessible on the Council's website at https://www.southnorfolkandbroadland.gov.uk/policies/taxi-private-hire).

Review Process

3.5 To ensure that the charges for the hire of future South Norfolk Council hackney carriages remain relevant, it is proposed that a system of reviewing fares should be adopted. Reviews can be instigated by the Licensing Authority. However, they are usually initiated by the hackney carriage trade and could take place annually.

3.6 The basis for a review would usually be to compare charges that have a direct impact upon the hackney carriage trade. For example, these could include:

- purchase of motor vehicles
- motor insurance
- maintenance of motor vehicles
- petrol and oil
- vehicle excise licences
- radio rental
- taximeters
- rents
- wages
- council tax
- licence fees

3.7 The percentage increase change across these headings from the date of the last table of fares review would be used as the basis for considering changes to the existing charges.

3.8 The recent escalation in fuel prices highlight the importance of there being in place a mechanism to review fares based upon those costs that directly affect the hackney carriage trade. South Norfolk Council is aware of the global situation in relation to oil, petrol and electricity prices and the impact nationally of these increases together with other cost of living rises. The proposed fares have largely been based on the charges set by other similar local licensing authorities with a view to achieving consistency regionally and to ensure that both hackney carriage drivers and their customers are not disadvantaged by virtue of their location.

3.9 Both Breckland District Council and Great Yarmouth Borough Council have recently reviewed their fare tables and the charges adopted by each are similar to those proposed within this report.

3.10 Seven responses were received in response to the consultation. In view of the policy alignments approved by members to date, and for complete oversight, comments received by this Council and Broadland District Council are both reported to inform the ongoing alignment of for taxi licensing, and all responses are provided for consideration by both Councils. Three of the consultation responses were received from current South Norfolk Council licence holders, one response from a Parish Council, one response from a charitable organisation and two responses were received from taximeter manufacturers.

4. Proposed action

4.1 The proposed table of fares for adoption is attached at Appendix One of this report.

4.2 Cabinet is requested to thoroughly review and consider both Appendix One and Appendix Two which details the responses to the consultation process.

5. Other options

5.1 Provision was made within the revised Hackney Carriage and Private Hire Vehicle Policy and Conditions for the installation of taximeters within hackney carriages. The implementation date for this was set at 1 April 2023. If Cabinet determines not to set a table of fares, it may prove necessary to review the Policy and Conditions document to ensure continued compliance.

6. Issues and risks

6.1 **Resource implications** – The introduction of taximeters and a table of fares will require additional resources. Additional tasks will include liaison with meter manufacturers and their agents, with licence holders to ensure that relevant vehicles are fitted with approved meters, potential increase in complaints regarding over-charging, particularly during the early transitional period and ongoing enforcement to ensure compliance with the byelaws and conditions. The lead-in development costs for the introduction of taximeters and a table of fares have already been resourced by way of a temporary contractor working with the Licensing Team. This has been funded until 31 March 2023. The costs of the additional tasks will be calculated and included in the ongoing review of licence fees.

6.2 **Legal implications** – Local authorities are required to have in place a taxi licensing policy to enable the Authority to carry out its functions relating to the licensing of Hackney Carriage and Private Hire Drivers, Vehicles and Operators. The current policy in place requires hackney carriage vehicles to be fitted with a taximeter and for an approved table of fares to be charged.

6.3 **Equality implications** – An Equality and Communities Impact Assessment has been completed. There are no human rights issues specific to the Policy and Conditions upon adoption of taximeter tariffs, as thereafter the Authority can demonstrate best practice and compliance with national guidance in the production of the table of fares.

6.4 **Environmental impact** – It is not anticipated that there will be any environmental impacts as a result of the introduction of taximeters and a table of fares.

6.5 **Crime and disorder** – The introduction of taximeters and an approved table of fares ensures that there is a consistency of approach in terms of the fees charged for journeys in hackney carriage vehicles.

6.6 **Risks** – There may be an additional financial burden placed on current licence holders to ensure that they meet the new proposed standards. If a table of fares were to be adopted, the costs to hackney carriage proprietors and drivers would include purchase of a taximeter, calibration and a possible reduction in income if the fares are set at a lower level than that currently charged. Possible benefits would be; an increase in income if the table of fares is set at a higher level than

that currently charged; a ‘level playing field’ for drivers as charges for the hire of vehicles would be identical; the ability to review these charges on an annual basis; and a clear charging regime for hirers, which could reduce complaints of overcharging.

7. Conclusion

7.1 South Norfolk Council’s current taxi licensing policy requires licensed hackney carriages from 1 April 2023 to be fitted with an approved taximeter which must, in accordance with adopted byelaws, display a fare that has been fixed by the council.

7.2 Section 65 of the Local Government (Miscellaneous Provisions) Act 1976 gives licensing authorities the power to determine a ‘table of fares’ in respect of the hire of hackney carriages.

7.3 A draft table of fares was consulted upon with interested parties and the comments received have been appraised, with a subsequent recommendation made in respect of the draft fares (Appendix Two).

7.4 Legislation requires any table of fares made by the Council to be published by notice in a local newspaper, setting out how objections can be made, for a period that must not be less than fourteen days. Any objections received must be considered and a table of fares (with or without modifications) shall come into force not later than two months from when the table was first made.

8. Recommendations

Cabinet is **RECOMMENDED** to:

1. Consider the draft table of fares document.
2. Consider the responses received to the consultation exercise, and any consequent proposed amendments to the draft table of fares.
3. Agree the proposed table of fares for their adoption with a view to the agreed fares taking effect from 1 April 2023.

Appendices

1. Proposed table of fares
2. Appraised responses to the consultation

Appendix One

SOUTH NORFOLK COUNCIL PROPOSED TABLE OF FARES

Tariffs	Initial hiring charge	Distance / waiting time for initial charge	Subsequent distance / waiting time charge	Extra charges
Tariff 1 **(Mon–Sat 0600 – 2300)**	T1: **£5.00**	For the first mile or 600 seconds or part thereof or a combination of parts of such distance and time	For each subsequent 176 yards or one minute or part thereof or a combination of parts of such distance and time **25p**	For cleaning following the soiling of the interior of the vehicle, a charge not exceeding **£80.00**
Tariff 2 **(Mon-Sun 2300 – 0600)**	T2: **£6.50**	For the first mile or 600 seconds or part thereof or a combination of parts of such distance and time	For each subsequent 176 yards or one minute or part thereof or a combination of parts of such distance and time **30p**	For cleaning following the soiling of the interior of the vehicle, a charge not exceeding **£80.00**
Tariff 3 **(Sunday 0600 – 2300 and public holidays)**	T3: **£5.50**	For the first mile or 660 seconds or part thereof or a combination of parts of such distance and time	For each subsequent 160 yards or one minute or part thereof or a combination of parts of such distance and time **25p**	For cleaning following the soiling of the interior of the vehicle, a charge not exceeding **£80.00**

Appendix Two

Appraised responses to the consultation

Date	Name	Occupation	Consultation Comment(s)	Response to comments
22/07/2022	1. Gary Wilson	Hackney carriage Operator	Could I please propose these rates are inline with Breckland council rates as we do cover rural areas same as Breckland. (The current Breckland DC hackney carriage fares were attached to Mr Wilson's response)	When considering what rates of fare would be the subject of the consultation exercise, South Norfolk Council looked at the level of charges applied by a number of neighbouring authorities. The majority of these authorities cover rural areas and rather than just mirroring one council's rates of fare, a more holistic approach was taken when looking at the proposed rates for South Norfolk.
25/07/2022	2. Robin Loxton	Hackney carriage proprietor / driver	Dear Sirs, I have read your plans and feel I must bring the following to your attention. Firstly, I may agree with some of your reasons for the introduction of Taxi Meters, but on the current proposals would not work or be viable within the area that I work. I work in the DISS area which is a small market town. We also have many smaller villages that surround Diss, majority of inhabitants are elderly. As we have no or	**Charges/costs in Diss area:** The overriding response to the points raised is that the proposed fares are the maximum chargeable – there is nothing to prevent a lower price (such as those currently levied) being charged. Whatever rates of fare are adopted there is no mandatory requirement for the full amount to be charged – the only necessity being that the adopted fares are not exceeded.

Date	Name	Occupation	Consultation Comment(s)	Response to comments
			very little Public Transport to talk about, Taxi are a life blood to these people and villagers. The current rate proposed would double (at Least) the cost to the villagers. As many of these villagers are on pensions or benefits doubling the cost would stop the villagers using a taxi and in the wider sense would cause more isolation and more costs for the council and the health services in the long run. Also, you have mentioned, that current Hackney carriage drivers can change there license to Private Hire before the 1st April 2023. On discussions with many Hackney carriage drivers in the Diss area, this is what they will be doing. There are many reasons but the main one is the costs. For Example: Currently the cost of a Taxi Journey from Diss to anywhere in Diss is between £5.00 and £5.50. If you then look at your proposed rates, the same journey could cost £7.50 as a minimum, plus getting along Victoria road (which is like a Car Park) most days, the cost could reach upto £9 or £10.00.	**Transfer hackney carriage (taxi) vehicle licence to private hire vehicle licence:** Licensed taxis can ply for hire, i.e. hailed in the street or hired from a rank, within the district (South Norfolk) for which they are licensed. The maximum charge for this type of hiring will be the proposed table of fares, with the charge commencing from when the passenger hires the vehicle. Taxis can also be pre-booked by telephone, like a private hire vehicle. Again, the maximum charge for this type of hiring will be contained in the proposed table of fares, although the charge has to be calculated from the point at which the hirer commences their journey.

Date	Name	Occupation	Consultation Comment(s)	Response to comments
			Most taxi drivers will be going Private Hire so they can keep the current level of charges. Therefore your proposed schedule locally within Diss or to and from the surrounding villages is not viable. Also, as a taxi driver, if everyone else goes to Private Hire, to keep there current charges, why should I or anyone stay as Hackney Carriage, lose business because the charges are too high. My suggestion would be as follows: 1 Mile £3.50 2 Mile £ 4.50 3 Mile £6.50 5 Mile £10.00 10 Mile £21.00 I think the council which is similar to our area is West Suffolk, so the charges should be close to them. I agree with Soiling Charges listed I agree with the timings listed. What is the proposed cost of the Taxi Meter? What type of meter are you thinking about, a Solid one fixed to the dash board or an interior mirror version?	Although it is unclear from the response as to how the hirings referred to are made, (i.e. ply for hire or pre-booked), the “current level of fares” referred to in the response can still be maintained as it appears they are below the maximum contained in the proposed table. South Norfolk Council has permitted current licensed taxi vehicle proprietors to licence their vehicle for private hire use by taking a flexible view of the vehicle age limits in the current Taxi and Private hire Policy. This enables proprietors and drivers to have the fullest opportunity to decide on the type of hire vehicle they wish to licence. **Suggested fares:** When considering what rates of fare would be the subject of the consultation exercise, South Norfolk Council looked at the level of charges applied by a number of neighbouring authorities. The majority of these authorities cover rural areas and rather than just mirroring one council’s rates of fare, a more holistic approach was taken when looking at the proposed rates for South Norfolk Council

Date	Name	Occupation	Consultation Comment(s)	Response to comments
			Concerning the downloading of the information from the Taxi Meter. Why is this to be done? Who will see this information? I am sure I might have further comments, but I believe these are the important questions at the moment Regards Robin Loxton	**Taxi meters:** The issue of taximeters was the subject of a previous consultation last year concerning South Norfolk Council's recently adopted Hackney Carriage and Private Hire Vehicle Policy. There was a proposed phased introduction of the policy requirements in respect of taximeters and fares, with a view to making them compulsory from 1 April 2023. In addition to meeting policy requirements, taximeters must also comply with the South Norfolk Council's hackney carriage byelaws and will need to be capable of being programmed with the charges contained in any adopted table of fares. Taximeters will need to be programmed with the charges contained in any adopted table of fares. This will be carried out by either the meter manufacturers or their authorised agents.
26/07/2022	3. Michelle de Oude	Acting Deputy Senior Advisor Opening Doors (organisation for people	Since we are not a licenced hackey cab operator we did not feel we needed to answer all the questions that were in the document, but we thought it would be useful to mention a couple of points from the perspective of an organisation that uses taxis regularly for the people who use our services.	The responses to the three key points made are: (a) The current consultation is in respect of hackney carriage (taxi) fares, although the issue of licensing wheelchair accessible vehicles (WAVs) is noted. In accordance with the Taxis

Date	Name	Occupation	Consultation Comment(s)	Response to comments
		with learning disabilities)	There are three key points we want to make; a. Hackey Cabs all need to be accessible to wheelchair users, we find it very difficult to find enough taxis that will take larger powered wheelchairs where the person remains seated in their chair due to their disability. Hackney cabs can also be difficult to get and out of if you have a mobility impairment, so again we would want to see more licencing of accessible taxis. b. Taxi drivers should have training on disability access issues as part of the conditions of their licence. We have seen some bad practice including where disabled people have not been treated with dignity or respect by drivers. c. The big current issue is that moving to a metered system means that people who use our service are having to pay a lot more to do the same journey. We would like to see some fixed price tariffs remained for standard journeys, otherwise this disadvantages disabled people who have no other choice but to use a taxi, and whose care costs (if they get any) often don't reflect the actual market cost of taxi fares, hence	and Private Hire Vehicles (Disabled Persons) Act 2022, (effective 28 June 2022), South Norfolk and Broadland District Councils publish on their website a list of WAVs. Some of these WAVs will take a larger wheelchair than the 'reference wheelchair standard' contained in Department for Transport (DfT) guidance to licensing authorities when designating WAVs. The DfT guidance is under review and may include updated guidance on the licensing and designation of WAVs. (b) All licensed South Norfolk Council taxi drivers have to undergo Safeguarding and Disability Awareness Training before obtaining a licence. Existing legislation requires drivers of designated wheelchair accessible vehicles to provide wheelchair users with reasonable mobility assistance, and refrain from charging them more than other passengers. From 28 June 2022, all taxi and private hire vehicle (PHV) drivers and operators – regardless of whether the vehicle is wheelchair accessible – will be subject to duties under the Equality Act. The main changes are that taxi and PHV drivers will be required to:

Date	Name	Occupation	Consultation Comment(s)	Response to comments
			they end up not being about to go out and live their lives. We hope you will find these points useful and would be happy to discus them further. Michelle	• Accept the carriage of any disabled person, provide them with reasonable mobility assistance, and carry their mobility aids, all without charging any more than they would for a non-disabled passenger. • Provide any disabled passenger who requests it with assistance to identify the vehicle, at no extra charge. PHV operators will be required to: • Accept bookings for or on behalf of any disabled person, if they have a suitable vehicle available. (c) Under existing arrangements, there is no control over the fares chargeable by South Norfolk Council licensed taxis. The adoption of a table of fares provides a level of protection for taxi users as it sets the maximum amount that can be charged. Taxi proprietors and drivers are not bound to charge the maximum amounts and can agree to accept a fare less than that shown on the meter. The rates contained in the table of fares are a balance between the cost to the customer and the viability of the driver to cover their costs and earn a living.

Date	Name	Occupation	Consultation Comment(s)	Response to comments
				If booked in advance, for example by telephone, hirers can agree a fare for their journey, which offers the hirer the opportunity to negotiate the cost of the fare. To assist with their negotiations, hirers can compare the cost of the fare against the charges levied by private hire vehicle operators. Any agreement reached cannot be more than the table of fares provides.
02/08/2022	4. Andrew Marshall-Brown	Hackney carriage proprietor /driver	With reference to the proposed Taximeter Table of Fares I have the following questions and observations based on them. Overall I believe the proposed rates and fare and competitive and strike a good balance between operating costs and not pricing users out of the market. That said I'm concerned that the remote areas will not receive service based on the fact there seems to be no provision for a pick up charge only the rate from when the customer enters to the point of alighting the vehicle. I operate mainly in the Diss area. If I were to be called to collect a client from Tivitshall St Mary and go two miles with the proposed pricing I would spend more in fuel alone travelling from Diss to the job and back than I would make in the whole job.	**Pick up charge:** By their very nature, i.e. being allowed to ply for hire either on a rank or being hailed in the street, taxis provide a unique link in the overall public transportation system and the relevant charges reflect their exclusive rights in this area. Legislation states that when a taxi is pre-booked (i.e. other than by being hired from a rank or plying for hire in the district), the fare or charge can only be calculated from the point at which the hirer commences their journey. The proposed table of fares seeks to balance the cost to the consumer against a reasonable income for the taxi driver. It would be difficult to quantify when a booking charge would be applicable and the costs involved.

Date	Name	Occupation	Consultation Comment(s)	Response to comments
			Therefore it would be impractical and I'll advised on a business viability basses to do the job. Being such a rural county with generally poor public transport services, Taxi's are often the only means of transport for some people. This lack of a pick up charge would remove that option and needs to be looked at. At the very least it needs to cover the additional fuel costs but in this example should be around £10 on top of the metered fee. Secondly, what meter will be acceptable ? I already have a meter fitted to my cab as it's a purpose built vehicle and the meter is manufactured by Sigma Will existing meters be accepted or will they have to be changed ? And lastly, will the meters be set to automatically adjust the rate as per the schedule or will the driver manually adjust the rate on the meter, giving them a level of control to reduce the charge for example using the day rate at night to help someone who is struggling with the cost of living ? I look forward to your replies and the outcome of the consultation	This type of additional cost may not be of benefit to the consumer and the example provided by the respondent could be fulfilled by a licensed private hire vehicle, who would be able to charge for the full distance as there is no legislation in place to control the costs of hiring a private hire vehicle. **Taximeter** The issue of taximeters was the subject of a previous consultation last year concerning South Norfolk Council's recently adopted Hackney Carriage and Private Hire Vehicle Policy. There was a proposed phased introduction of the policy requirements in respect of taximeters and fares, with a view to making them compulsory from 1 April 2023. In addition to meeting policy requirements, taximeters must also comply with the South Norfolk Council hackney carriage byelaws and will need to be capable of being programmed with the charges contained in any adopted table of fares. The revised policy requires all licensed hackney carriages to be fitted with a sealed calendar controlled taximeter. This in effect means that there will be no manual selection by the driver as

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				the correct rate of fare, dependent on the day or time of the hiring, will automatically be selected by the meter. As previously indicated, any table of fares is the maximum chargeable, there is nothing preventing a lesser fare being charged, such as the example given by the respondent.
06/09/22	5. Hayley Goldson	Clerk, Chedgrave Parish Council	Chedgrave Parish Council considered this matter at its meeting of 1st September 2022. The council agreed that any 'table of fares' would need to be set in light of current volatility of fuel prices so that taxi firms are not unduly penalised by fixed price fares in the event that fuel costs increase even further. I hope this makes sense but please get back to me if you require any further information.	Part of the table of fares consultation process included a section on forthcoming reviews of any charges set. Fluctuations in fuel prices was proposed to be included in any calculations when reviewing fares in the future.
10/08/22	6. Steve Laidler	Technical Director Digitax Electronics UK (Ltd) (taximeter manufacturer / supplier)	Sorry I just have not had time to do this earlier. So, the speed cross over point is not a fixed speed it is the speed at which the driver is earning more on time below that speed and more on distance above. Also, the way the initial w/t is calculated is simply keep the same ratio between the initial time and distance as the following time and distance. For example, in your proposed tariff you have the initial distance as 1760 yards then	Taximeters charge by time or distance and the final fare is a combination of both. The point at which the meter changes from charging by time to distance or from distance to time is known as the ‘speed cross over point’. This is the speed at which the driver is earning more on the time charge element when below that speed and more on the distance charge element when above that speed.

Date	Name	Occupation	Consultation Comment(s)	Response to comments
			following 176 yards which is a very simple 10/1. So, if the following w/t is 60 seconds then the initial should be 10x that at 600seconds. The speed crossover point is easy to calculate in your case 176 yards or 60 seconds yards divided by seconds gives 2.933 y/s to get MPH multiply by a constant of 2.04545 6 MPH If the initial w/t is not corrected 1760y/60s x 2.04545 = 60MPH which would mean it would never happen where anyone was charged for distance. The correct w/t has to be in the same ratio so it should be 600 seconds not 60. The speed crossover is not a fixed speed it is completely dependent on the ratio between time and distance. Around the UK you will find it normally works out about 8 to 12 mph but that's only an average. If I can be of any further help please do not hesitate to give me a ring.	When setting the table of fares for consultation, it was thought that the speed cross over point could be fixed, but, further to a conversation with the respondent, when programming the meter there is a calculation to determine this point. As a result, the initial waiting time of 60 seconds in the proposed table of fares in respect of tariffs one and two will have to be amended to 600 seconds and from 60 seconds to 660 seconds in respect of tariff 3 to ensure that the same ratio is used for both the initial time and distance as the following time and distance. **Recommendation:** In the "**Distance / waiting time for initial charge"** column in respect of **tariffs 1 and 2** of the proposed table of fares, replace the wording "**one minute**" with '**600 seconds'** and in respect of **tariff 3** replace the wording "**one minute"** with '**660 seconds**'.
12/08/22	7. Tony Kirton	Managing Director Viking Electronics Ltd	I design & made my first taximeters (Kirto taximeter) in 1982 and been manufacturing taximeter since and since 2010 have been of MID approved types.	See comments in respect of respondent 6 above.

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		(taximeter manufacturer / supplier)	I attach a PDF with some council tariff sheets you can look at, the Buckinghamshire one, the table that goes into our Viking taximeters is below. Taximeter work that waiting time is commutes to distance, the initial £5.00 charge for a mile is fine, but the 60 second for £5.00 is a lot, it will go to £5.20 will before the mile. our taximeter will take 176 yards away from mile start every 60 second, so it will after ten minutes go to £5.20. I can send you an excel sheet that work out the timing for above and more, like! put in price-per-mile increment (20p) and it give you the yards same with the waiting time. And Christmas New Year tariff, maybe 100% tariff 1. I am here to help you get it right first time.	

CABINET CORE AGENDA 2022/23

Date	Key	Title of Report	Responsible Officer	Portfolio Holder	Exempt
Council Meeting 12 December					
9 Jan	Key	South Norfolk Village Clusters Housing Allocations Plan - Publication of Regulation 19 Draft Plan	Paul Harris	Lisa Neal	
	Key	HR Payroll System and Payroll Bureau	Emma Hodds	Adrian Dearnley	Exempt
	Key	To establish and enter into a joint venture to deliver a Programme of Mitigation for Nutrient Neutrality	Phil Courtier	John Fuller	
		Diss and District Neighbourhood Plan – Additions to the Council's Response to Reg 16 Consultation	Richard Squires	John Fuller	
	Key	GNLP Gypsy and Traveller Sites Consultation	Helen Mellors	Lisa Neal	
13 Feb	Key	Greater Norwich 5-year Infrastructure Investment Plan	Paul Harris	John Fuller	
	Key	Draft Local Development Order Browick Interchange	Nina Cunningham/ Glen Beaumont	Lisa Neal	Exempt
		Ketteringham Depot	Simon Phelan	Graham Minshull	Exempt
		The Future Sale of the South Norfolk House site	Debbie Lorimer	Kay Mason Billig	Exempt
		Council Tax Assistance	Richard Dunsire / Lindsay Sayer	Alison Thomas	
	Key	Revenue Budget and Council Tax 2023/24	Rodney Fincham	Adrian Dearnley	
	Key	Capital Strategy and Capital Programme 2023/24 to 2027/28	Rodney Fincham	Adrian Dearnley	
	Key	Treasury Management Strategy Statement 2023/24	Rodney Fincham	Adrian Dearnley	
Council Meeting 22 February					
20 Mar	Key	Ratification Local Development Order FEP	Nina Cunningham/ Glen Beaumont	Lisa Neal	
		Health and Wellbeing Strategy	Mike Pursehouse	Alison Thomas	
		Review of Environmental Strategy and Delivery Plan	Anna Sommazzi	Graham Minshull	
		Diss and District Neighbourhood Plan Consideration of Examiner's Report	Richard Squires	John Fuller	
		Wymondham Neighbourhood Plan Consideration of Examiner's Report	Richard Squires	John Fuller	
	Key	Regulation of Investigatory Powers Act (RIPA) Policy	Nick Howard	Lisa Neal	

Date	Key	Title of Report	Responsible Officer	Portfolio Holder	Exempt
	Key	Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy (GIRAMS) – Governance	Paul Harris	Lisa Neal	
	Key	Public Sector Decarbonisation match funding	Annie Sommazzi	Graham Minshull	Exempt
		Performance Report Q3 2022/23	Sinead Carey / Helen Hall	Adrian Dearnley / Kay Mason Billig	

A key decision is an executive decision which will:

*(a) result in the Council spending, or saving a **significant** amount compared with the Budget for the service or function the decision relates to; or*

*(b) to be **significant** in terms of its effects on communities living or working in an area, comprising two or more wards in the area of the Council, in that it will:*

(i) Have a long-term, lasting impact on that community; or

(ii) Restrict the ability of individual businesses or residents in that area to undertake particular activities; or

(iii) Removes the provision of a service or facility for that community; or

(iv) Increases the charges payable by members of the community to provide a service or facility by more than 5%; or

(v) Have the potential to create significant local controversy or reputational damage to the Council; or

(vi) Is a matter that the decision maker considers to be a key decision.

When assessing whether or not a decision is a key decision the decision maker must consider all the circumstances of the case. However, a decision which results in a significant amount spent or saved will generally be considered to be a key decision if:

(a) the amount spent is £200,000 or more of revenue expenditure; or
(b) savings of £75,000 or more per annum, or
(c) capital expenditure of £200,000 or more (where a decision makes a commitment for spending over a p eriod of time, it is the total commitment that must be considered to see if it is a key decision).