E36

SUSTAINABILITY APPRAISAL (SA) OF THE SOUTH NORFOLK LOCAL PLAN

SA REPORT ADDENDUM

APRIL 2015

PREPARED FOR

South Norfolk COUNCIL

AECOM

REVISION SCHEDULE					
Rev	**Date**	**Details**	**Prepared by**	**Reviewed by**	**Approved by**
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INTRODUCTION

1 BACKGROUND

1.1.1 On 17th April 2014 South Norfolk Council submitted three Local Plan documents – the Wymondham Area Action Plan (Wymondham AAP), the Site Specific Allocations & Policies Document (SSAPD) and the Development Management Policies Document (DMPD) – to the Secretary of State. Jeremy Youle BA (Hons) MA MRTPI was then appointed as Inspector on behalf of the Secretary of State to lead the examination of the three Local Plan documents.

1.1.2 Examination hearings were held between October and December 2014,[1] subsequent to which the Inspector wrote to the Council identifying that some further work – to include Sustainability Appraisal – was necessary with a view to preparing a schedule of Proposed Main Modifications to the plan as submitted.[2]

1.1.3 It was understood that further work should include giving consideration to alternative ways of meeting the Greater Norwich Joint Core Strategy (JCS) Policy 9 requirement to distribute 1,800 new dwellings within the 'Norwich Policy Area' part of South Norfolk.

Box 1.1: Greater Norwich JCS Policy 9

The Joint Core Strategy for Broadland, Norwich and South Norfolk was adopted in March 2011, with amendments adopted in January 2014. It sets the overall development 'framework' for the whole of the three districts, including a settlement hierarchy and allocation numbers, but does not allocate specific sites. Rather, the JCS defers site allocations to the SSAPD, Wymondham AAP and Long Stratton AAP (although subsequently the Cringleford Neighbourhood Plan has allocated land for the minimum 1,200 dwellings allocated to Cringleford). The three (four, including the Cringleford NP) documents between them seek to allocate the sites in accordance with the requirements of the JCS.

JCS Policy 9 sets out the strategy for growth in the Norwich Policy Area, including 1,000 dwellings at Easton/Costessey, 1,200 dwellings at Cringleford, 1,000 dwellings at Hethersett, 1,800 dwellings at Long Stratton and a minimum target of 2,200 dwellings for the Main Town of Wymondham. Also included is a 'floating' housing target of 1,800 dwellings for the South Norfolk part of the Norwich Policy Area. The target is to be achieved through allocation of 'smaller sites and possible additions to named growth locations'.

1.1.4 At the current time, work has been completed and a schedule of Proposed Main Modifications has been published for consultation.

2 THIS SA REPORT ADDENDUM

2.1.1 The Local Plan is being developed alongside a process of **Sustainability Appraisal (SA)**, a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.

2.1.2 The aim of **this SA Report Addendum** is essentially to present information on the Proposed Main Modifications and alternatives, with a view to informing the consultation and subsequent finalisation of the Local Plan.

N.B. As part of the discussion of alternatives there is a discussion of **site options** that have fed in and been considered as part of the plan-making process. Most work to examine site options (in isolation) was undertaken prior to submission, and is 'sign-posted' from this report; however, some new information on site options - i.e. information relating to appraisal work completed post submission - is included within this report. This is discussed further in 10.3.1.

[1] Information relating to the examination can be found online at http://www.south-norfolk.gov.uk/planning/6681.asp
[2] See www.south-norfolk.gov.uk/planning/media/
Letter_from_Inspector_to_Council_regarding_the_next_stage_of_the_examination_process_17-12-14.pdf

Structure of this SA Report Addendum

2.1.3 In order to achieve the stated aim (see 2.1.2) this SA Report Addendum answers the following four questions in turn:

1. What's the scope of the SA?
   - i.e. what are the parameters of the appraisal?
2. What has plan-making / SA involved up to this point?
   - i.e. how has appraisal of alternatives fed into and informed development of the Proposed Main Modifications?
   - Specifically, this part of the report explains how plan-making has been informed by appraisal of site options and alternative ways of meeting the JCS Policy 9 requirement to distribute 1,800 new dwellings within the Norwich Policy Area.
3. What are the SA findings at this stage?
   - i.e. in relation to the Proposed Main Modifications.
4. What happens next?

2.1.4 **Table 2.1** explains more about the regulatory basis for answering these questions.

Why is this report an 'Addendum'?

2.1.5 This report is known as an SA Report 'Addendum' on the basis that it is an addendum to the three SA Reports submitted in 2014 alongside each of the Local Plan documents. To some extent there is a need to read this report alongside the 2014 reports. Where this is the case, efforts are made within the text below to bring this to the reader's attention.

2.1.6 As an addendum, this report –

- Presents only focused information in relation to the SA scope;
- Presents focused information in relation to reasonable alternatives; and
- Is primarily concerned within presenting an appraisal of Proposed Main Modifications, rather than 'the draft Local Plan as a whole, as modified'.

Table 2.1: Questions answered by the SA Report, in line with Regulatory[3] requirements

SA REPORT QUESTION		IN LINE WITH REGULATIONS THE SA REPORT MUST INCLUDE…
What's the scope of the SA?	What's the plan seeking to achieve?	• An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the sustainability 'context'?	• Relevant environmental protection objectives, established at international or national level • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the sustainability 'baseline'?	• Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan • The environmental characteristics of areas likely to be significantly affected • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What are the key issues & objectives that should be a focus?	• Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
What has plan-making / SA involved up to this point?		• Outline reasons for selecting the **alternatives** dealt with (and thus an explanation of the 'reasonableness' of the approach) • The likely significant effects associated with **alternatives** • Outline reasons for selecting the preferred approach in-light of **alternatives** assessment / a description of how environmental objectives and considerations are reflected in the draft plan
What are the SA findings at this current stage?		• The likely significant effects associated with **the draft plan** • The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing **the draft plan**
What happens next?		• A description of the monitoring measures envisaged
N.B. The right-hand column of Table 2.1 does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation. This interpretation is explained in Appendix 1 of this report.		

[3] Environmental Assessment of Plans and Programmes Regulations 2004

PART 1: WHAT'S THE SCOPE OF THE SA?

3 INTRODUCTION

3.1.1 This part of the report aims to introduce the reader to the scope of the SA. In particular, and as required by the Regulations, this Chapter answers the series of questions below.

- What's the plan seeking to achieve?
- What's the 'context'?
- What's the 'baseline'?
- What are the key issues and objectives that should be a focus of SEA?

4 WHAT'S THE PLAN SEEKING TO ACHIEVE?

4.1.1 SA work at the current time relates to three Local Plan documents, which once adopted will form a Local Plan for South Norfolk in conjunction with other plans (the Greater Norwich Joint Core Strategy and Cringleford Neighbourhood Plan are adopted, whilst the Long Stratton AAP and Gypsies and Travellers Local Plan document are emerging).

4.1.2 Taking each plan in turn -

- The Site Specific Allocations & Policies Document (SSAPD) will allocate sites and establish site specific policy that will be drawn-on when determining planning applications;
- The Development Management Policies Document (DMPD) will set out policy that will be drawn-on when determining planning applications (across the whole district); and
- The Wymondham Area Action Plan (Wymondham AAP) will allocate sites / set site specific policy, as well as establish development management policy that will be drawn-on when determining planning applications at any site within Wymondham.

4.1.3 All three Local Plan documents are being prepared in line with the National Planning Policy Framework (NPPF) and the adopted Greater Norwich Joint Core Strategy. The plans are also being prepared in light of the adopted and emerging plans of neighbouring Local Planning Authorities, in line with the Duty to Co-operate introduced under the 2011 Localism Act.

4.1.4 Each plan is being developed in-line with a bespoke list of objectives; however, for reasons of brevity the objectives of each plan are not repeated here.

What's the plan not seeking to achieve?

4.1.5 It is important to emphasise that the Local Plan is strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the development management process). The strategic nature of the plan is reflected in the scope of the SA.

5 WHAT'S THE 'CONTEXT'?

5.1.1 An important first step when seeking to establish the appropriate scope of an SA involves reviewing context messages in relation to: broad problems / issues; and objectives, i.e. 'things that are aimed at or sought'. Specific consideration must be given to international and national context messages, in-line with requirements.[4] National context messages are established first and foremost by the National Planning Policy Framework (NPPF),[5] but there a need to also 'cast the net wider'.

[4] Schedule II(e)
[5] DCLG (2012) National Planning Policy Framework [online] available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

5.1.2 A detailed context review is presented within each of the three submitted SA Reports, and it is not necessary to repeat that information here given the focused nature of SA work at the current time.

5.1.3 However, it is appropriate to present a brief **update** to the context review. Specifically, there is a need to take into account the following two sources of contextual evidence that have emerged recently (i.e. since the plans / SA Reports were published in 2013) -

- On a strategic level, understanding of economic opportunities locally has been enhanced considerably by the publication of the **New Anglia Strategic Economic Plan**. The following headline message is given: *"The New Anglia area has strengths in many of the sectors with the greatest potential for growth – advanced manufacturing and engineering [at Hethel Engineering Centre], agri-tech, energy, ICT and digital creative, and life sciences [at Norwich Research Park]. Our area is also fortunate in its natural and cultural assets, making it a very attractive place to live and work. But we are at a tipping point. To unlock the potential in our key sectors and to create new jobs and businesses requires focussed investment by local partners and Government to improve the area's infrastructure and ensure business has a supply of skilled workers and the right support to grow. We have made good progress already in partnership with Government with the signing of City Deals for Greater Norwich and Greater Ipswich… [and] investment by the Government in the A11 in Suffolk and Norfolk, the A14 in Cambridgeshire and the Northern Distributor Road around Norwich will also unlock more jobs and growth."* In terms of locally specific opportunities, 'Attleborough, Thetford, Mildenhall, Brandon and Newmarket along the A11' is identified as one of eight strategic growth locations. References to Wymondham are limited to two schemes that are being delivered as part of the Norwich Area Transportation Strategy: one to increase permeability between South Wymondham and the town centre, and the other which is a package of measures to improve access to Hethel from the town.

- Also of note are the detailed representations on the Local Plan document that have been received from **English Heritage**. In relation to Wymondham, English Heritage state that:

  "We support the AAP and the strong underlying message that the character of the settlement and its heritage will be a key consideration in the plan. The Council's commitment is clear in the comments in the foreword to the plan; we also note that the character of the settlements in South Norfolk has been a consideration in the sustainability appraisal of the Joint Core Strategy… We have previously recommended that the AAP includes a policy relating to the protection of the setting of Wymondham Abbey; we continue to recommend this, both to ensure that there is a balanced approach to the natural and historic environment in the document, and that there is a positive strategy in relation to heritage, as required in paragraph 126 of the NPPF.

  … The level of development proposed is very challenging as a proportion of the size of this small historic settlement, and there will be a need for careful assimilation to avoid damage to local character, taking a whole settlement approach. In terms of heritage assets, and the contribution of the landscape to their appreciation, the allocations identified in the AAP are not located in the most sensitive areas on the edge of Wymondham. We consider the landscape in an arc from the northwest round to the southwest to be of great sensitivity in providing the setting of the abbey, the associated scheduled remains and the historic core conservation area. We note that many of the proposed development site policies include requirements and qualifications relating to protection of the setting of the abbey, as appropriate."

6 WHAT'S THE 'BASELINE'?

6.1.1 The baseline review is about expanding on the consideration of problems/issues identified through context review so that they are locally specific. Establishing the baseline is about reviewing data-sets established through monitoring for specific 'indicators'.

6.1.2 Numerous indicators are considered within the baseline review presented within the SA Reports, and it is not necessary to repeat that information here given the focused nature of SA work at the current time.

6.1.3 It is, however, appropriate to present a brief review of the baseline, and in particular to present a brief review of some baseline issues associated with Wymondham. As will become apparent, Wymondham is a focus of SA work at the current time.

6.1.4 General baseline issues at the district scale include the following -

- The South Norfolk **landscape** is a mixture of broad, open arable farmland plateaux and six main river valleys. The local Landscape Character Assessment refines the national Landscape Character Areas which identified seven separate landscape types across the district. Throughout the district there are a number of areas of locally significant landscape value. Many of these follow the route of important river valleys, predominantly along the River Wensum and the rivers Waveney, Tiffey, Yare, Tas, Tud and Chet. Additional areas of landscape value also include areas of open land that maintain a separation between certain settlements, and a large landscape protection area around the A47 south of Norwich, which is considered important for preserving the historic setting of the city of Norwich.
- There are relatively few international **nature conservation** sites within South Norfolk, and none fall entirely within the boundary of the district. Four small component units of The Broads SAC/Broadland SPA are within South Norfolk between Surlingham and Loddon with two other very small component units near Geldeston on the District's southern boundary. The River Wensum SAC forms the northern boundary of the district in the area near Costessey. In addition, two component units of the Norfolk Valley Fens SAC are within South Norfolk. There are also many valuable wildlife habitats of national and local importance in South Norfolk, with 26 sites designated as SSSI, nearly 250 County Wildlife Sites and over 100 areas of ancient woodland.
- The towns and villages scattered around the district are home to many historic buildings and **heritage features**, which help create a distinctive character. The district has a wealth of listed buildings, scheduled monuments, and Conservation Areas. There are also historic gardens covering 25 hectares remaining from significant estates in the District, although at least 26 more hectares have been lost since the 1880s. There are also many areas of archaeological interest within the district, including a protected area of Roman-era hedgerow patterns in Dickleburgh.
- East Anglia is recognised as one of the driest areas of the country. Pressure on **water** resource supplies is exacerbated by lower rainfall, the large agricultural economy as well as continued residential and employment growth. Water is a vital societal, ecological and economic resource. The presence of the Broads Authority area (which has a status equivalent to a National Park) and numerous international, national and locally important water-based conservation areas highlights the importance of water resources in the plan area.
- The district is not ranked highly in the Index of Deprivation (ranking 291 out of 354), although some pockets of **deprivation** exist at Costessey and Diss. Old Costessey is the most deprived ward in the district, and is within the third most deprived nationally for income, education and child poverty. Also, across the district educational achievement in 2012 was slightly below the national average at GCSE level.

- For a predominantly rural area, South Norfolk is relatively affluent; however, some residents do experience issues associated with low **income**, at or towards the minimum wage (average adult earnings are 8% more than the national average 2012). Obtaining access to public transport services, especially in the more remote parts of the district, is often problematic for accessing the workplace. Within South Norfolk, the biggest **employers** are the Norfolk and Norwich Hospital and the Norwich Research Park at Colney. More than half of South Norfolk's resident workforce is employed within Norwich City's area. Wymondham is recognised as a regionally important strategic employment centre and is already home to nearby Lotus Cars, the Hethel Engineering Centre, Gateway 11 Business Park and the Norfolk Police Headquarters.
- Although a predominantly rural district, the district is bisected by a number of key strategic **transport** routes (A11, A47, A140 & A143) and rail routes to London and Cambridge. As might be expected in a rural area use of private motor vehicles is higher than average. Public transport to the main market towns and along the strategic road routes is generally good but more limited in the rural areas. Living in a rural area can increase the degree of isolation, resulting in poor access to facilities and create a dependence upon private motor transport. This is an issue that will become increasingly prominent given an ageing population.

6.1.5 Baseline issues specific to Wymondham include -

- Wymondham is the largest settlement in South Norfolk, and is a market town with an attractive historic centre, enhanced by the Abbey.
- It has local job opportunities on several large employment areas with close proximity to the strategically important employment site at Hethel.
- Wymondham is located close to Norwich on the strategically important A11 corridor, and is generally well connected to road and rail (Norwich-Cambridge) networks.
- It has a good level of services and facilities including primary schools, two high schools, shops, library, doctors and a leisure centre.
- However, Wymondham High Academy (secondary school) is at capacity, and expansion beyond that already planned for (to accommodate up to 2050 pupils, resulting from approximately 2500 new dwellings) is not possible on its (land-locked) site.
- The Strategic Gap to the north-east of the town is not an absolute constraint on development but is a constraint on the potential location of new growth in that area.
- The historic landscape setting of the town and Grade I listed Wymondham Abbey to the west of the town are likewise not absolute constraints on development but are a significant constraint on the potential location of new growth, particularly the Abbey.
- The River Tiffey valley to the north-west of the town is not an absolute constraint on development but does influence the potential location of new growth.

6.1.6 The issue of **secondary school education capacity** is worthy of particular consideration. Much work has gone into understanding the constraints that exist at Wymondham with regards to secondary school capacity. Work has involved examining whether or not there will be any surplus of school places in 2024/25/26 that would enable additional dwellings to be accommodated (over and above what is planned for in the AAP and committed) without exceeding the capacity of the school (based on an appropriate pupil multiplier). Work has also been undertaken to establish whether there likely to be any capacity at neighbouring schools (e.g. Wymondham College Academy and Hethersett Academy) to accommodate children within the catchment of Wymondham High School, if they could not be accommodated at that school. No agreement on this point has been reached between some key Wymondham landowners and South Norfolk Council / Norfolk County Council (as Education Authority).[6]

[6] A Statement of Common Ground between the parties agreed for the Examination can be found here - http://www.south-norfolk.gov.uk/planning/media/E11_Joint_Statement_of_Common_Ground-WAAP_Education_Provision.pdf

7 WHAT ARE THE KEY ISSUES AND OBJECTIVES THAT SHOULD BE A FOCUS OF SEA?

7.1.1 In light of context / baseline review and analysis of key issues it is possible to identify a discrete list of sustainability objectives, which collectively provide a methodological 'framework' for appraisal. This SA framework has been applied consistently for each of the Local Plan documents, and has been in place for a number of years (and it is not deemed appropriate to update it at the current time).

Table 7.1: Sustainability objectives (the SA 'framework') established through scoping

Objectives	
ENV1	Maintain and enhance biodiversity, geodiversity, species and habitat quality, and avoid habitat fragmentation
ENV2	Limit or reduce vulnerability to climate change, including minimising the risks from flooding
ENV3	Maximise the use of renewable energy solutions and reduce contributions to climate change
ENV4	Reduce the effect of traffic on the environment
ENV5	Improve air quality and minimise noise, vibration and light pollution
ENV6	Maintain and enhance the distinctiveness and quality of landscapes, townscapes and the historic environment
ENV7	Minimise the loss of undeveloped land and conserve and improve the quality of soil resources
ENV8	Improve water qualities and provide for sustainable sources of supply and sustainable use
ENV9	Minimise the production of waste and increase recycling
S1	Provide everybody with the opportunity to live in a decent, suitable and affordable home
S2	Reduce poverty, inequality and social exclusion
S3	Offer opportunities for all sections of the population to have rewarding and satisfying employment
S4	Improve accessibility to essential services, facilities and the workplace, particularly for those most in need
S5	Improve the education and skills of the population overall
S6	Improve the health of the population overall
S7	Encourage local community identity and foster mixed communities with co-operative attitudes, helping to reduce anti-social activity
S8	Improve the quality of where people live
EC1	Encourage sustained economic growth
EC2	Encourage and accommodate both indigenous and inward investment promoting a positive image of the District
EC3	Encourage efficient patterns of movement in support of economic growth
EC4	Improve the social and environmental performance of the economy
EC5	Improve economic performance in rural areas

PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

8 INTRODUCTION

8.1.1 The South Norfolk Local Plan-making / SA process has been ongoing since 2010, as explained within the submitted SA Reports and Examination Document D1: Sustainability Appraisal Technical Background Paper.[7] At the current time, however, there is no need to recap that entire 'story'.

8.1.2 Post submission, the focus of plan-making / SA has been on the appraisal of alternative approaches to meeting the Joint Core Strategy (JCS) requirement to allocate land for 1,800 new homes at 'smaller sites' and possible additions to named growth locations within the Norwich Policy Area part of the district – see Box 1.1, above.

8.1.3 As such, the **aim of this part of the report** is to…

… explain the process of alternatives consideration / appraisal, and how this fed-into and influenced plan-making (i.e. 'modification-making').

8.1.4 This part of the report is structured as follows:

Chapter 9 – By way of background, presents an overview of plan-making / SA work prior to submission

Chapter 10 – Explains the parameters to alternatives consideration post submission

Chapter 11 – Explains the process of developing alternatives post submission (with a view to demonstrating the 'reasonableness' of those eventually established)

Chapter 12 – Presents appraisal findings in relation to reasonable alternatives

Chapter 13 – Explains the Council's reasons for developing the Proposed Main Modifications in-light of the appraisal of reasonable alternatives.

[7] See http://www.south-norfolk.gov.uk/planning/media/D1_Sustainability_Appraisal_Technical_Background_Paper_May_2014.pdf

9 OVERVIEW OF PLAN-MAKING / SA PRIOR TO SUBMISSION

9.1 Introduction

9.1.1 Plan-making / SA work has been underway since 2010, with numerous plan-making steps undertaken between this time and the point of plan submission in early 2014. The aim of this chapter is to briefly explain this aspect of the plan-making / SA process – particularly in relation to the Site Specific Allocations and Polices Document (SSAPD) and the Wymondham AAP - as it helps to set the context for plan-making / SA work post submission.

9.1.2 The SSAPD and the Wymondham AAP were produced largely concurrently, as introduced in Table 9.1 and discussed below.

Table 9.1: Timeline of the plan-making / SA process for the two Local Plan documents

SSAPD	Wymondham AAP
Issues and Options Consultation (Autumn 2010)	
Issues and Options Consultation (Autumn 2011)	
Preferred Options Consultation (September 2012)	'Shaping the future development of your town' Consultation (Jan 2012)
Amendments to Preferred Options (March 2013)	Preferred Options Consultation (January 2013)
Pre-Submission Plans and SA Reports (November 2013)	

9.2 Issues and Options Consultation (Autumn 2010)

9.2.1 The Council put out an initial 'call for sites' in 2005. This resulted in 1500 potential sites across the district (62 sites in Wymondham) being put forward as potentially suitable for development. These sites were consulted on in autumn 2010 alongside the SA Scoping Report and draft site appraisal criteria; however, no assessment of the sites was undertaken at this stage. Comments on the all of the sites were received and a further 147 potential sites (12 in Wymondham) were suggested through the consultation process.

9.3 Issues and Options Consultation (Autumn 2011)

9.3.1 This second consultation focused on the original 1500 sites plus the 147 further potential sites. This followed the previous approach in the autumn 2010 consultation, which proposed to assess the long list of sites through the detailed SA site assessment process. A further 74 sites were suggested for the District (five in Wymondham) through this consultation. Again, no assessment of sites was undertaken at this stage.

9.3.2 It is at this point that the 'story' splits for the two DPDs. The remainder of the plan-making and SA 'story' is told firstly for the SSAPD and secondly for the Wymondham AAP.

9.4 SSAPD Preferred Options Consultation (September 2012)

9.4.1 Following consultation responses in 2010 and 2011 a full assessment of all (roughly 1700) reasonable site options in the District was undertaken using the site selection / appraisal criteria that were consulted on in 2010 and 2011. As a result of this the Council were able to identify preferred sites[8] for housing, employment and other uses and these were consulted on in the September 2012 document, alongside an Interim SA Report that included an assessment for each site.

[8] To reiterate, the SSAPD deals with sites across the district except sites in Wymondham, Long Stratton and Cringleford. Sites within Wymondham and Long Stratton are dealt with through Area Action Plans, whilst sites in Cringleford are dealt with through a Neighbourhood Plan.

9.4.2 In determining preferred options, regard was had to the settlement hierarchy set out in the JCS, prioritising the most sustainable locations in terms access to services, facilities and transport alternatives. Another major driver was the need to allocate at least five dwellings across a range of settlements, thereby enabling an element of affordable housing to be provided across a wide variety of communities.

9.4.3 In a small number of locations with limited capacity, sites sometimes needed to be assessed 'in competition' with other sites. Where this was the case, the Council selected those sites that performed most favourably. In cases where no acceptable site could be found in a settlement with a JCS allocation, no allocation was made: whilst this will have some negative social and economic consequences it can ensure that there are no undue negative environmental impacts.

9.5 SSAPD Amendments to Preferred Options Consultation (March 2013)

9.5.1 Following analysis of the responses to the September 2012 Preferred Options consultation a small number of amendments were made, generally where either the landowner had withdrawn the site, or where a constraint had been raised that the Council believed could not be overcome. No separate SA work was undertaken at this stage (but the site assessment tables were updated accordingly at Pre-Submission stage, see below).

9.6 WAAP 'Shaping the future development of your town' Consultation (Jan 2012)

9.6.1 This high-level consultation invited comments about potential broad locations for housing and employment in Wymondham. No SA document accompanied the consultation and there was no assessment of individual sites at this stage. The feedback from the community fed-in to the identification of the reasonable alternatives to be subsequently assessed.

9.7 WAAP Preferred Options Consultation (January 2013)

9.7.1 The Preferred Options consultation document outlined the sites that the Council intended to allocate for housing and employment, and also set out a range of policies. An Interim SA Report was consulted on alongside, which presented a two-part approach to appraisal of reasonable alternatives in relation to the spatial strategy at Wymondham.

- The first stage was a detailed assessment of all 79 reasonable sites, using the criteria-based site appraisal methodology developed previously through consultation. This identified those sites that perform more favourably, and those that are constrained.
- The second stage was to then consider 'strategic' issues through the appraisal of broad spatial alternatives. Three options were appraised that would involve concentrating growth at different locations around the town, and the dispersed growth option was also appraised.

9.7.2 The consultation document and Interim SA Report explained how (in-light of SA work) the preferred approach was to concentrate a large proportion of growth to the south of Wymondham and the remainder spread around the town through a number of smaller sites. The preferred approach could be justified in terms of sustainability considerations, although it is important to note that the preferred approach to some extent reflected the fact that planning applications were being submitted and determined at the time.[9]

9.8 Pre-submission Consultation on both Local Plan documents (November 2013)

9.8.1 In the period between the Preferred Options consultation and the Pre-Submission consultation further planning applications had been granted, in part due to the lack of a five-year housing land supply across the NPA. Through granting planning permissions, the Council had met its JCS requirement for allocating the 'floating' 1,800 dwellings in the Norwich Policy Area and a minimum of 2,200 dwellings at Wymondham in advance of the submission of the SSAPD and the Wymondham AAP.

[9] Until December 2014, there was lack of a five-year land supply across the whole of the NPA.

9.8.2 At Wymondham, the number of dwellings with planning permission resulted in a need for the Council to allocate sites for 'at least 1,154' dwellings. Previously, the Preferred Options stage, it was thought that there was a need to allocate sites for 'at least 1,488' dwellings. Also, by November 2013 a resolution to grant planning permission for 1,230 dwellings to the south of Wymondham had been made by the Development Management Committee (although the Section 106 legal agreement had not been finalised and therefore planning permission not granted; the planning permissions were eventually granted in February 2014).

9.8.3 The preferred strategy at Wymondham involved meeting[10] the JCS requirement for Wymondham to deliver a minimum of 2,200 dwellings, but still essentially equated to a low growth strategy as Wymondham was assigned only a very small proportion (3%) of the 'floating 1,800'. The option of Wymondham taking a higher share of the 'floating 1800', in line with the settlement hierarchy, was not supported primarily on the basis of technical evidence regarding high school capacity in the area, but also given the need to protect the landscape setting of the town, Wymondham Abbey to the west, and the strategic gap with Hethersett to the north-east.

9.8.4 Three sites are notable in that they 'just missed out'. They were preferred sites at the time of the Preferred Options consultation, but were deemed surplus to requirements by November 2013 (given the factors discussed above, principally the granting of various permissions due in part to the lack of a five-year land supply). The sites were:

- Tuttles Lane East – Nurseries at the Homestead (55 dwellings);
- Land at Wymondham Rugby Club (83 dwellings);[11] and
- Land Off Cavick Road (150 dwellings).

9.8.5 The preferred approach to site allocations as set out within the Wymondham AAP as published / submitted is shown in **Table 9.2**.

9.8.6 The preferred approach to distributing the 'floating 1800' small sites requirement as presented in the SSAPD as published / submitted is shown in **Table 9.3**.

9.8.7 Finally, **Table 9.4** explains the distribution of the 'floating 1,800' allocations made through the two plans.

[10] Taking into account planning permissions, the submitted Wymondham AAP allocates housing for a total of 2,276 dwellings – 76 dwellings above the minimum 2,200 – plus an allocation for a care community (equivalent to a further 142 market dwellings).
[11] In fact, the allocation at the Wymondham Rugby Club site (83 dwellings) was removed as market housing and re-allocated as a care home community (for which an extant planning permission was, and still is, in place) on the basis that it would help to meet identified needs for care housing but not increase pressure on school capacity in Wymondham.

Table 9.2: Preferred approach within the Wymondham AAP submission document

ID	Site name	Number of dwellings
R1016 (part)	Land south of station, Right Up Lane	1,230 dwellings
R0169	Land near Silfield Road	
R0249a	Land off Park Close/Silfield Road	
567	Land at Wymondham Rugby Club, Tuttles Lane	Retirement care community
	Total	**1,230 dwellings***

* The 1,230 figure was calculated on the assumption that the proposed retirement care community would not contribute towards the achievement of housing targets for Wymondham; however a subsequent update to the Planning Practice Guidance[12] confirmed that it is appropriate to 'count' care housing when calculating the degree to which housing requirements / need for conventional housing is being met. Using a simple calculation,[13] the proposed retirement care community is the equivalent of delivering 142 conventional dwellings. Counting these 142 dwellings means that the AAP as submitted actually allocates land for 1,372 in Wymondham, 218 dwellings above the requirement for 1,154.

Table 9.3: Preferred approach to distributing the 'floating 1800' small sites requirement as presented in the SSAPD submission document

Settlement	Number of dwellings allocated	Additional contribution from permissions
Bawburgh	5	-
Bracon Ash	20	-
Bramerton	10	-
Costessey	400	417
Hethersett	226	-
Keswick	10	-
Little Melton	20	-
Mulbarton	150	-
Newton Flotman	30	8
Poringland	320	5
Spooner Row	15	-
Stoke Holy Cross	75	-
Surlingham	10	-
Swardeston	30	-
Tasburgh	20	-
Trowse	160	-
Tharston	-	120
Total	**1,501**	**550**
	Grand total	**2,051 dwellings**

[12] See: http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/#paragraph_037 (accessed 17/03/15)

[13] Planning permission 2012/1883 allows for allows for an 80 bed care home, 24 2-bedroom homes, 66 2-bedroom apartments, 25 elderly mentally infirm beds and a staff block for 12 people. The Council's calculation has allowed for 50% of the care home beds (so 40 units), all of the 2-bedroom homes (24 units), all of the 2-bedroom apartments (66 units), 50% of the EMI beds (rounded down to 12 units), no allowance for the 12 unit staff block as it is presumed to be 'shift' beds for staff – total is therefore 142 units.

Table 9.4: Distribution of the 'floating 1,800' as set out within the two submitted plans

Settlement Hierarchy Category	Number of dwellings	Percentage
Norwich Urban Area	946	45%
Main Town (i.e. Wymondham)	76	4%
Key Service Centres	671	32%
Service Villages	388	18%
Other Villages	15	1%

N.B. Planning permissions since submission (in fact, since the 'base date' of the plans) mean that once site allocations are in place there will be a land supply for 2,487 dwellings at additions to named growth locations and smaller sites within the Norwich Policy Area part of South Norfolk, well in excess of the requirement to allocate land for 1,800 and also significantly more than was anticipated to be the case at the time of plan submission. The 2,487 figure breaks down as follows:

- Norwich Urban Area - 816 dwellings (33%)
- Main Town (i.e. Wymondham) - 75 dwellings (3%)
- Key Service Centres - 1,048 dwellings (42%)
- Service Villages - 534 dwellings (21%)
- Other Villages - 14 dwellings (1%)

The point to note is that planning permissions mean that the Key Service Centres and Service Villages are set to deliver a greater amount of new housing than was 'the plan'.

10 PARAMETERS TO ALTERNATIVES CONSIDERATION POST SUBMISSION

10.1 Introduction

10.1.1 At Examination hearings in December 2014 the Inspector queried why the SA had not tested reasonable alternatives for distributing the 'floating 1,800'. The specific questions asked by the Inspector were:

- [Question 43] How were sites selected to provide the 1,800 float and how was their broad distribution decided upon?
- [Question 44] Were there any reasonable options for the broad spatial distribution of the 1,800 dwellings (i.e. the overall numbers of houses to be apportioned to individual settlements and/or to the five tiers in the settlement hierarchy)? Should options for the broad spatial distribution of the float between settlements be tested through the SA process or has it been sufficient to test individual sites (alongside the SA of overall settlement numbers)? Is any additional SA work necessary?

10.1.2 In addition, the Inspector also asked [Question 45] if the distribution of the floating 1,800 dwellings accorded with the settlement hierarchy set out in the JCS and, in particular, if the 'relatively low' contributions to the 1,800 from Wymondham, Cringleford and Long Stratton were justified given their relatively high positions in the settlement hierarchy.

10.1.3 In response to these questions, objectors argued that Wymondham is the most sustainable settlement in South Norfolk and is near the top of the settlement hierarchy (being the only Main Town in the South Norfolk part of the NPA); and that the Council should have reasonably tested the effects of a higher proportion of the 'floating 1,800' being delivered at Wymondham.

10.1.4 As such, the Council commissioned AECOM to set about undertaking further evidence gathering and appraisal work to identify the reasonable alternatives for distributing the floating 1,800 across the South Norfolk part of the Norwich Policy Area (including options that would involve additional housing growth at Wymondham).

10.1.5 In seeking to establish reasonable alternatives, it quickly became apparent that there are a range of strategic and site specific considerations that act as parameters. The aim of this chapter is to consider 'strategic' and 'site specific' considerations in turn.

10.2 Strategic considerations that act as parameters

10.2.1 The 'floating 1,800' must be spatially distributed according to several constraints in order to be in general conformity with the JCS which states (paragraph 6.6):

"The smaller sites allowance is intended to provide a balance between site sizes and locations to encourage flexibility and the shorter term delivery of new housing. The locations of the smaller sites will be decided in accordance with the settlement hierarchy… The smaller sites will be less than the 1,000 dwellings or more identified at strategic growth locations, and will reflect the scales of development provided for at each level of the settlement hierarchy described in policies 12-16. The allocations will be dependent upon the availability and suitability of sites proposed through the Site Specific Policies and Allocations Development Plan Document production process, and will reflect the form, character and service capacities of each locality."

10.2.2 This suggests that Wymondham could theoretically accommodate at most **an additional 1,000 new homes**, i.e. 1,000 homes over and above the 2,200 home strategic allocation within the submitted AAP (allocated in line with Policy 9 of the JCS). This would mean 3,200 new homes in total at Wymondham.

10.2.3 However, the JCS SA Report[14] identified that Wymondham has a limit of about 3,000 new homes, due to the impact upon the setting and historic town centre of higher growth (and also the potential to impact the strategic gap between Wymondham and Hethersett). As such, the option of delivering 1,000 additional homes can be considered an 'unreasonable' option and, at most, there is the theoretical potential to allocate **an additional 800 new homes**.

10.2.4 In addition to potentially considering higher growth options of up to 800 additional homes[15] at Wymondham, it is necessary to consider whether any other settlements in the settlement hierarchy, particularly within the higher tiers (the Norwich Urban Area or Key Service Centres), might also accommodate higher levels of growth (and, in doing so, potentially 'take the pressure off' Wymondham). However, analysis by the Council confirms that the option of additional growth at higher order settlements other than Wymondham is considered unreasonable, as explained in **Table 10.1**. In some instances, the Council's reasoning reflects the fact that planning permissions have been granted on allocated and non-allocated sites (taking into account the situation as of April 2014).

[14] See Table 4.2 of that document; available at: http://www.greaternorwichgrowth.org.uk/dmsdocument/272
[15] The actual figure is 800 - 76 = **724 dwellings** as the submitted Wymondham AAP already allocates 76 dwellings over the minimum 2,200 required in the JCS, i.e. 76 dwellings of the floating 1,800

Table 10.1: Justification for not considering additional growth at other higher order settlements

Settlement (and classification within the settlement hierarchy)	Commentary
Easton (Norwich Urban Area)	All of the sites that were put forward for consideration have been included in the Site Specific Allocations document; therefore it is not realistic to propose further development in this location in terms of deliverability. Deliverability would also be called into question given the scale of the development already proposed in the Site Specific Allocations document in relation to the size of the existing village.
Costessey (Norwich Urban Area)	The situation is more complex; there are other sites that were put forward for allocation in Costessey and it is in the top tier of the JCS Settlement Hierarchy. However, other than the allocated site, the proposals were all rejected through the site assessment process. Unlike Wymondham, there are no sites that were allocated in a previous iteration of the plan and which could be "reinstated", and although four sites have been promoted at Examination though written representations, no early applications have been made and little is known about viability and deliverability. Only one of the sites being pursued through written representations would actually accommodate more than 10 dwellings. Of the sites that were put forward but which have not been pursued at Examination, those which raised the fewest concerns at the Site Assessment stage have not been actively promoted for a number of years now, so again there are questions on deliverability.
Cringleford (Norwich Urban Area)	Cringleford is the subject of a 'made' (i.e. adopted) Neighbourhood Plan allocating 'approximately' 1,200 dwellings (1,200 is the minimum number required by the JCS).
Trowse (Norwich Urban Area)	It is the Council's view that all of the realistic sites have been allocated at Trowse taking into account the fact that the village is constrained by the A47and A146, the flood plain of the River Yare and the Broads Authority area.
Colney (Norwich Urban Area)	The focus has been the Strategic Employment Allocation for the expansion of the Norwich Research Park, rather than housing.
Long Stratton (Key Service Centre)	Long Stratton is accommodating 181 dwellings from the smaller sites allowance (constituting planning permissions granted, in part, due to the lack of five-year land supply at the time of determination) and, for various reasons, including wastewater treatment capacity and the need to achieve an appropriate degree of 'self-containment' identified through the JCS Examination, the Council considers further development problematic. The Long Stratton Area Action Plan Pre-Submission version therefore includes the minimum 1800 dwellings allocated to Long Stratton plus the additional 181 dwellings.
Hethersett and Poringland / Framingham Earl (Key Service Centre)	Along with Long Stratton, these settlements are already delivering a good proportion of the floating 1,800, and almost all of the allocations already have planning permission. In terms of their position in the hierarchy, the NPA Key Service Centres are delivering a higher level of growth than the two higher tiers (Norwich Urban Area & Main Towns) combined within South Norfolk. Consequently any distribution which suggested even more development at these locations would be further skewing the distribution away from the broad JCS intentions. Further specific considerations are as follows - • Hethersett – constrained by the Strategic Gap to both sides of village and a lack of employment opportunities in the village. • Poringland / Framingham Earl – constrained in-light of JCS policy, which recognises that Poringland has significant unbuilt housing commitments at the base date of the JCS, hence the allocation of only 100-200 so need to be careful about overloading existing settlement with new development. There is a lack of employment opportunities in the village (with only a small employment allocation set to be made) and surface water issues; also, it is not on a BRT route and there is no nearby Park & Ride sites to encourage sustainable transport choices.

10.2.5 The option of increasing development at lower order settlements - i.e. Service Villages and Other Villages - is also considered unreasonable given limited facilities in these locations, and also given the various planning permissions that are in place. It is important to bear in mind the JCS Policy 9 requirement that: *"The locations of the smaller sites will be decided in accordance with the settlement hierarchy."*

10.2.6 There are, however, a few limited opportunities to *delete* a proposed allocation at a settlement where planning permission has not yet been granted and where the allocation numbers are above the JCS minimum level.[16] Specifically, at Poringland (a Key Service Centre) and Swardeston, Stoke Holy Cross, Newton Flotman and Bracon Ash / Mulbarton (Service Villages) there is the potential to delete a proposed allocation.

10.2.7 At higher order settlements (i.e. Wymondham and those discussed in Table 10.1) the option of deleting any of the proposed allocations can be ruled-out. There are limited options to have less housing as the majority of sites allocated now have planning permission, and of those allocated sites that do not have planning permission -

- The large allocation at Easton is supported in its current form as it will deliver much more than just housing – it will bring forward a number of beneficial services and facilities, plus Easton is a strategic growth location in the JCS;
- The housing with care allocation in Hethersett is supported as it is surrounded by the larger HET 1 allocation which does have consent; and
- The Friarscroft Lane allocation in the WAAP is supported as it is in a very sustainable location within walking distance of the town centre with a doctors surgery next to the site.

10.2.8 In **summary**, strategic considerations mean that any reasonable alternatives must reflect: the possibility of higher growth at Wymondham up to a maximum of 800 additional homes (724 in practice); and the possibility of lower growth at certain other settlements.

[16] See JCS policies 9 and 12-15

10.3 Site specific considerations that act as parameters

Wymondham

10.3.1 Understanding of the sites that are available to feed into the establishment of alternatives (i.e. alternative approaches to delivering additional housing) is established on the basis of SA work undertaken prior to submission - i.e. the SA work discussed in Appendix 6 and Appendix 8 of the Wymondham AAP SA Report – and also the site options appraisal update work that has been completed post submission (see **Appendix 2** of this report).

10.3.2 Table 10.2 lists those sites that have been shown to perform well, and hence should feed into alternatives appraisal. Whilst appraisal did highlight some constraints,[17] smaller parts of the sites have potential for development (e.g. that part closest to the settlement boundary / BRT route, or that part away from a biodiversity or heritage asset). Other sites need not feed into alternatives appraisal because they are associated with likely impacts that would be difficult or impossible to mitigate.

Table 10.2: Sites at Wymondham

Location	ID	Site name
North	0567	Land at Wymondham Rugby Club, Tuttles Lane
North	1017	Tuttles Lane East – Nurseries at the Homestead
North	1015	Land north east of Wymondham
South West	1151a	Land off Cavick Road
South West	R0168b	Land east of Straygound Lane, south of Industrial Estate
South West	0174	London Road / Suton Lane

10.3.3 The sites are clustered in two areas:

- North of Wymondham; and
- South-west of Wymondham.

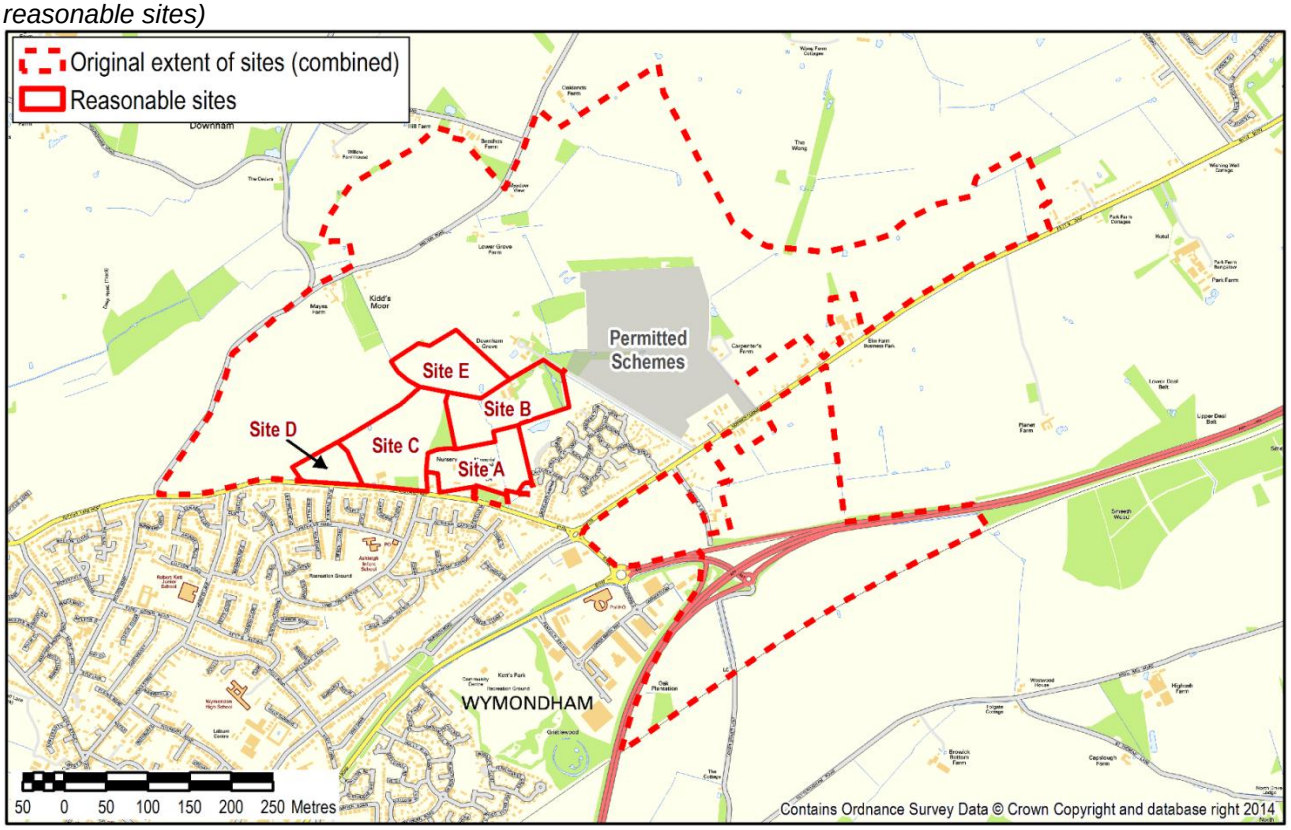
10.3.4 In the **North of Wymondham**, the three sites together cover a very large area of land (enough land to deliver about 1,850 new homes). As such, the decision was taken to reduce the extent of land under consideration. This step was taken drawing on the site specific appraisal findings set out in Appendix 6 of the Wymondham AAP SA Report. Essentially, the step was taken to rule-out -

- Land away from the existing built-up area / town centre / BRT route; and
- Land where there is the greatest potential for landscape (or heritage) impacts.

[17] Issues raised in relation to these (better performing) sites related to: existing use, service availability, local access to services, settlement boundary, conflict with existing land use policy (open land), listed building, archaeology, tree preservation order, minerals resources, loss of greenfield land, loss of higher grade agricultural land, impact on a County Wildlife Site and access.

10.3.5 The outcome of this work was the identification of a smaller area of land, which can be sub-divided into five 'reasonable' sites. These sites are shown as A – E in the figure below.

Figure 10.1: The original extent of sites to the north of Wymondham, and the revised extent (i.e. the reasonable sites)



10.3.6 At each of the sites to the **south-west of Wymondham**, the decision was also taken to reduce the extent of the site on the basis of the appraisal findings set out in Appendix 6 of the Wymondham AAP SA Report, namely:

- the need to be close to shops and services in the Wymondham urban area to the north and east and the Bus Rapid Transport corridor along the London Road;
- the need to avoid impacts to the historic setting of Wymondham Abbey, Gonville Hall and Wymondham itself; and
- proximity to a County Wildlife Site (to the west of the Strayground Lane site).

10.3.7 The outcome of this work was the identification of four 'reasonable' sites. These sites are shown as F – I in the figure below.

Figure 10.2: The original extent of the Land off Cavick Road site, and the revised ('reasonable') site

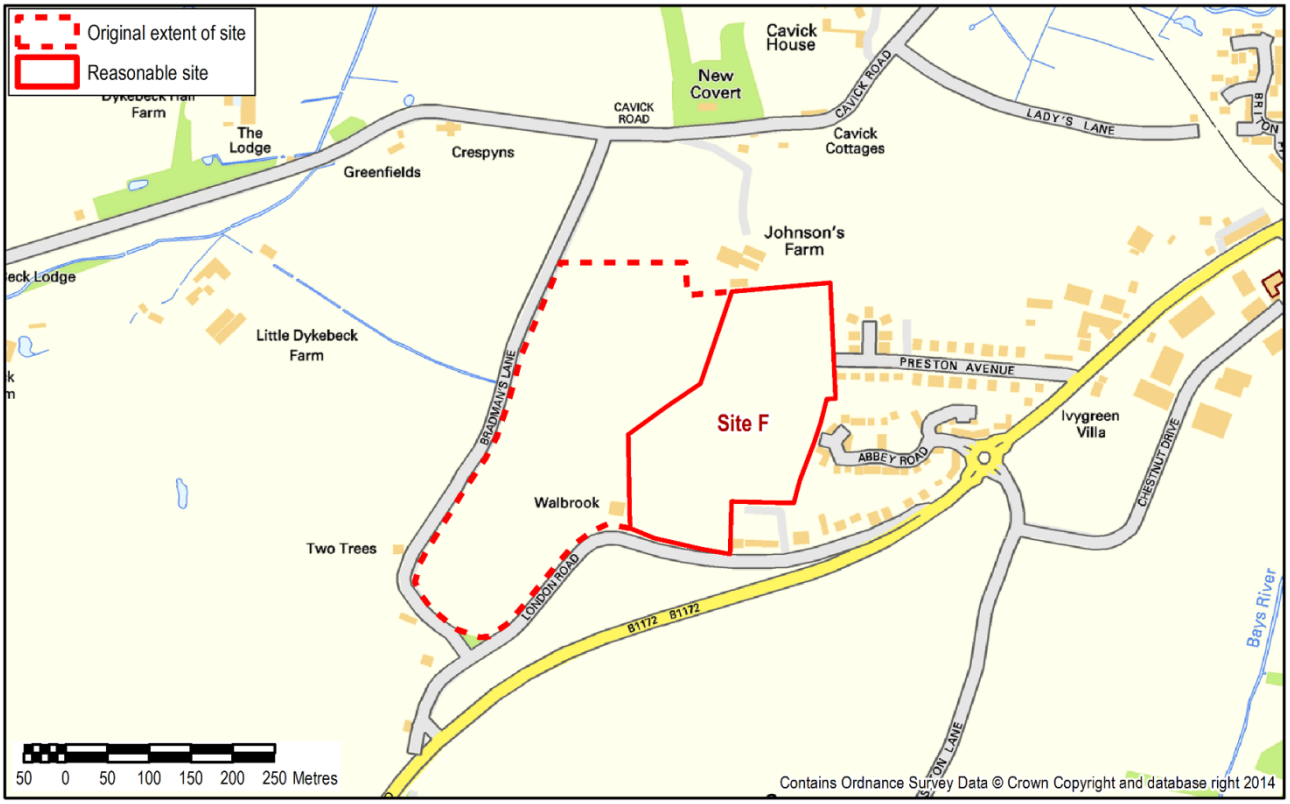


Figure 10.3: The original extent of the Strayground Lane site, and the revised ('reasonable') site

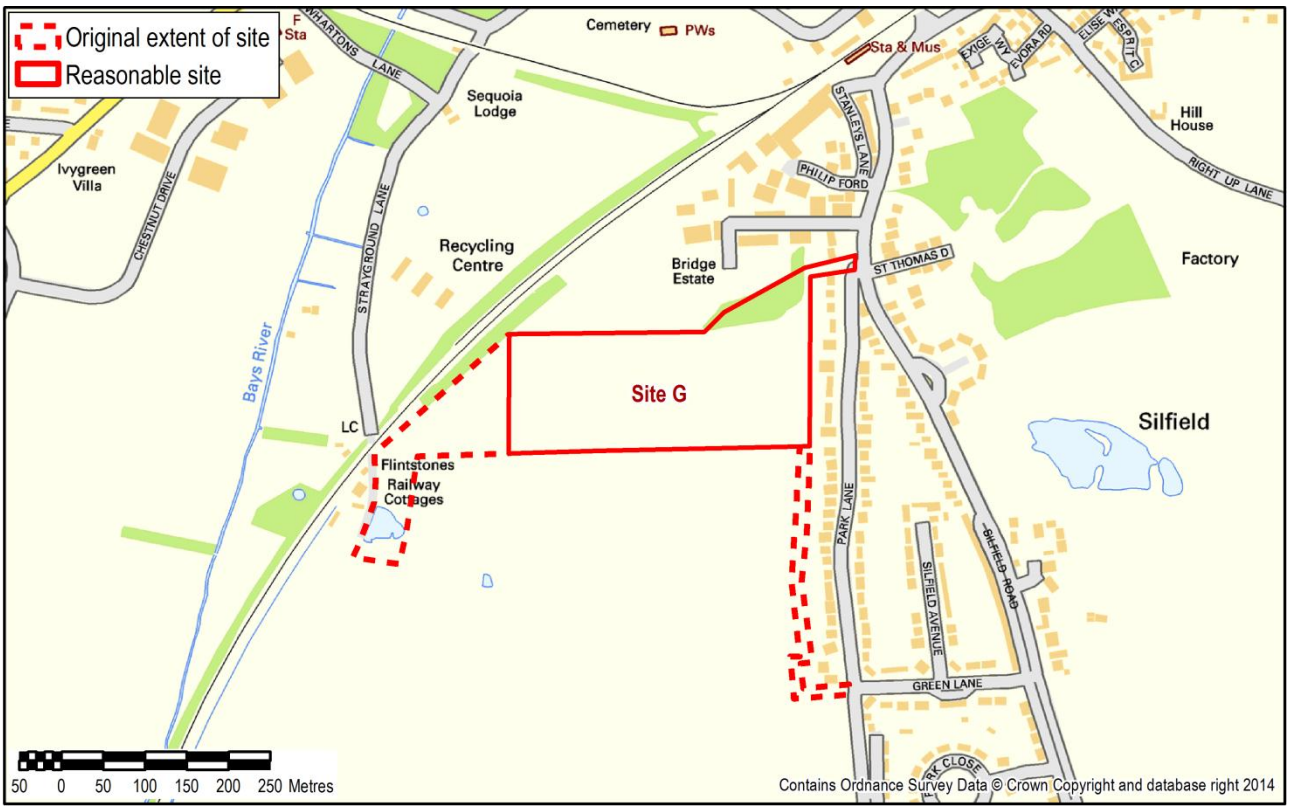
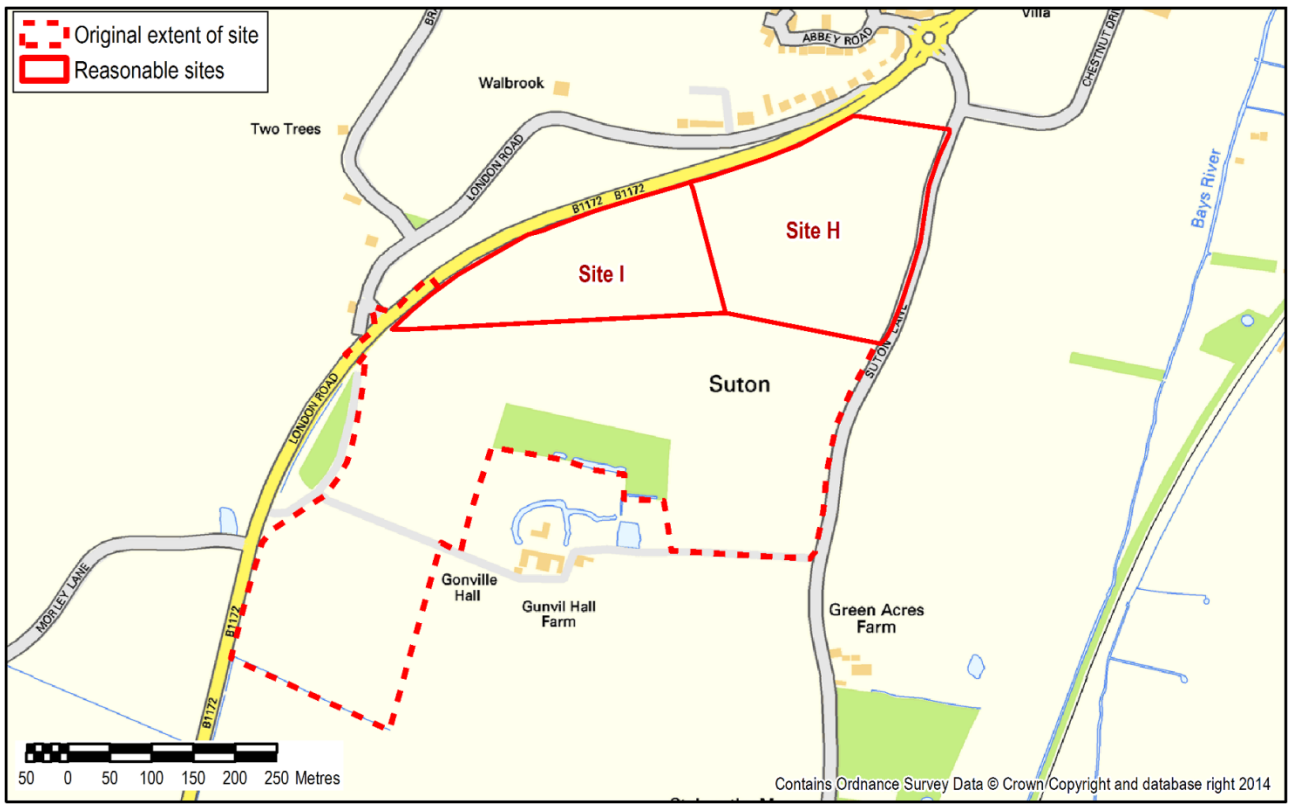


Figure 10.4: The original extent of the London Rd / Suton Lane site, and the revised ('reasonable') sites



Certain other settlements

10.3.8 Table 10.3 lists sites allocated (within the SSAPD as submitted) at certain settlements (i.e. those where the allocation numbers are above the JCS target) that do not yet have planning permission, and hence could have some land 'de-allocated' (i.e. not allocated in the final plan, despite being allocated within the plan as submitted). To be clear, sites *not* listed in the table are those that either A) are located at a settlement where there is no potential to reduce the allocation given the JCS target; or B) have planning permission.

Table 10.3: Allocated sites currently without planning permission, and the number of dwellings that could potentially be de-allocated

Settlement	Site	Number of dwellings that could be de allocated*
Swardeston	SWA1: Main Road	10
Stoke Holy Cross	STO1: South of Long Lane	50
Newton Flotman	NEW1: Flordon Road/Church Road	18
Bracon Ash / Mulbarton	BRA1: Norwich Road	20
Poringland	POR4: The Ridings	20

* The number of dwellings that could potentially be de-allocated is determined by the need to deliver a level of housing in-line with the top-end of the JCS target. Taking Newton Flotman as an example:

- the JCS target is '10–20';
- the submitted plan establishes that the village should deliver 38 dwellings;
- hence there is the potential to de-allocate land for 18 dwellings (at NEW1, which is the only allocated site in the village).

11 ESTABLISHING ALTERNATIVES

11.1 Introduction

11.1.1 In light of the strategic and site-specific parameters discussed above, work was undertaken to establish alternatives – i.e. alternative approaches to site allocation.

11.1.2 Ideally, a single set of alternatives would have been established that varied in terms of both the approach to growth at Wymondham and the approach to growth at the Service Villages; however, it was recognised that this was not possible given the number of sites 'in contention', and the fact that there is little potential to rank sites in an order of preference. Rather, it was recognised that there was a need to establish / appraise **several sets of alternatives**.

11.1.3 The discussion below covers 1) Wymondham and then 2) other settlements. The aim is to explain why it was 'reasonable' to look at certain sets of alternatives.

11.2 Establishing 'reasonable alternatives' for Wymondham

11.2.1 On the basis of the 'site specific parameters' discussed above, it was recognised that nine sites were in contention: five to the north (A-E) and four to the south-west (F-I).

11.2.2 All were understood to perform very roughly on a par when considered in isolation, i.e. it was not the case that they could be ranked in order of preference. Given the myriad different approaches that might be taken to delivering additional growth it was recognised that it would be very difficult to establish / appraise a single set of alternatives. Rather, it was recognised that there was a need to establish / appraise:

- Broad (i.e. non-site specific) alternatives;
- Detailed alternatives for the north; and
- Detailed alternatives for the south-west.

Establishing broad (i.e. non-site specific) alternatives

11.2.3 The following alternatives were established -

Option 1 - No significant additional growth at Wymondham

Option 2 - Significant additional growth to the north

Option 3 - Significant additional growth to the south-west

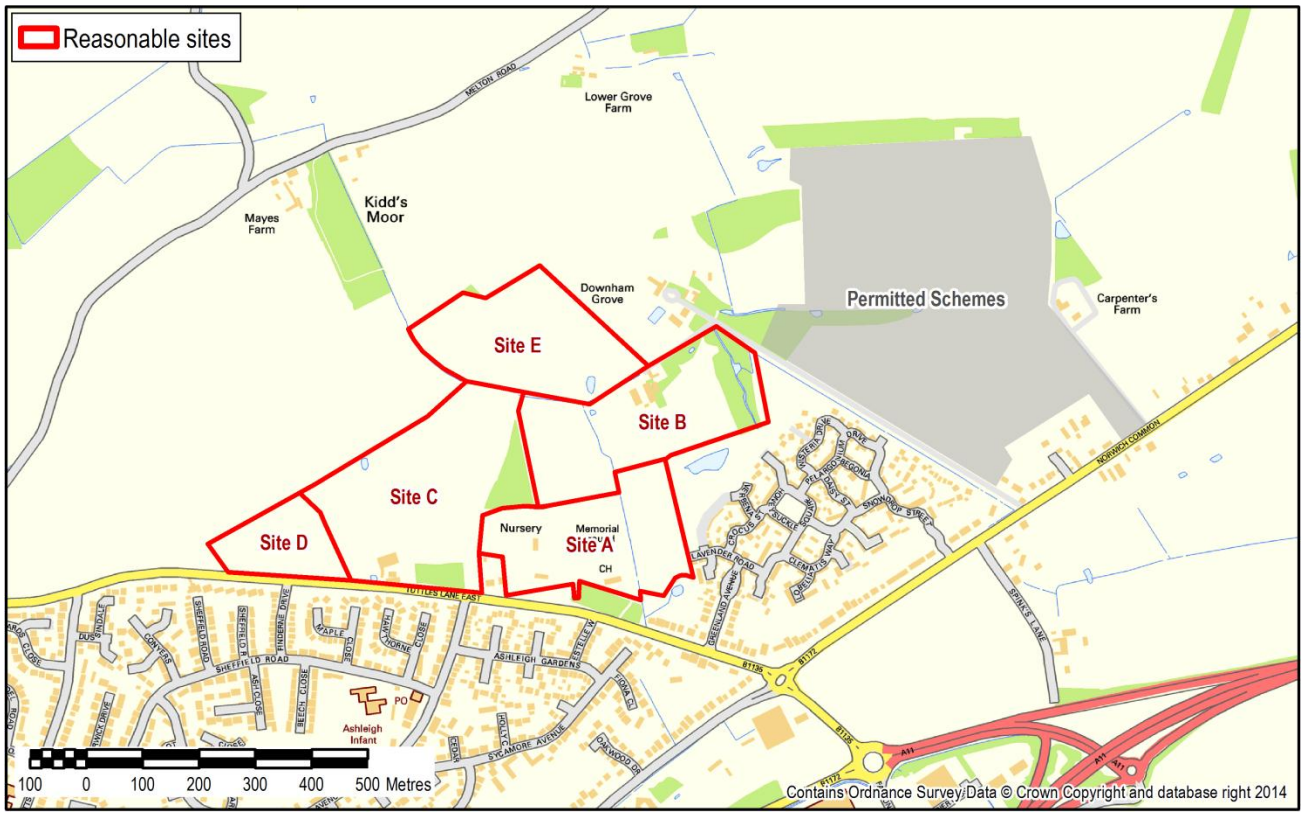
Option 4 - Significant additional growth (i.e. the same level of growth as would be delivered under Option 2 or Option 3) split equally between the north and the south-west

11.2.4 'Significant' growth might mean up to 600-800 dwellings, but this first set of alternatives for Wymondham (of three) need not be defined tightly in this sense. Options that are defined more tightly in terms of the quantum of growth are discussed below.

Establishing detailed (i.e. site specific) alternatives for the North

11.2.5 As discussed above, to the north of Wymondham there are five sites under consideration – see Figure 11.1.

Figure 11.1: Sites in contention (i.e. 'reasonable' sites) to the north of Wymondham



11.2.6 It was possible to establish a basic 'rule' to guide the establishment of alternatives; namely the rule that growth to the east of the area is preferable to growth to the west, and that sites away from the settlement boundary would only be brought forward if in combination with other sites that would adjoin them to the settlement boundary.

11.2.7 Given this rule, five alternatives were established as follows:

Option 1 - Nil additional growth

Option 2 - 'Low' additional growth (assumed to be 150 dwellings) at Site A

Option 3 - 'Medium' additional growth (assumed to be 300 dwellings) at Sites A and B

Option 4 - 'High' additional growth (assumed to be 500 dwellings) at Sites A, B and C

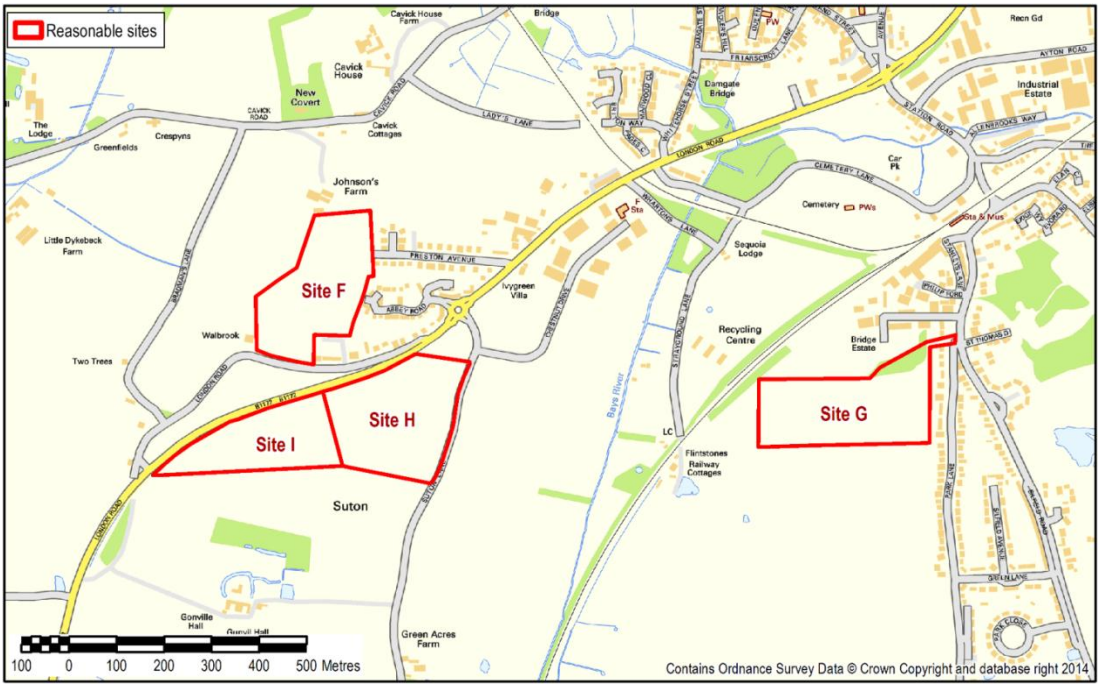
Option 5 - 'Very high' additional growth (assumed to be 800 dwellings) at Sites A, B, C, D and E.

11.2.8 The other important point to note is that under each option it is assumed that there would be nil additional growth elsewhere at Wymondham, i.e. nil additional growth to the south-west.

Establishing detailed (i.e. site specific) alternatives for the South-west

11.2.9 As discussed above, to the south-west of Wymondham there are four sites under consideration – see Figure 11.2.

Figure 11.2: Sites in contention (i.e. 'reasonable' sites) to the south-west of Wymondham



11.2.10 It was possible to establish a basic 'rule' to guide the establishment of alternatives; namely the rule that Site I would only ever be developed if in combination with Site H (so, in effect Site H is a sub-area of Site H/I).

11.2.11 Given this rule, 12 alternatives were established as follows:

Option 1 - Nil additional growth

Option 2 - Site F (assumed to be 150 dwellings)

Option 3 - Site G (assumed to be 150 dwellings)

Option 4 - Site H (assumed to be 150 dwellings)

Option 5 - Site H/I (assumed to be 300 dwellings)

Option 6 - Sites F and G (assumed to be 300 dwellings)

Option 7 - Sites G and H (assumed to be 300 dwellings)

Option 8 - Sites F and H (assumed to be 300 dwellings)

Option 9 - Sites F, G and H (assumed to be 450 dwellings)

Option 10 - Sites F and H/I (assumed to be 450 dwellings)

Option 11 - Sites G and H/I (assumed to be 450 dwellings)

Option 12 - Sites F, G and H/I (assumed to be 600 dwellings)

11.2.12 The other important point to note is that under each option it is assumed that there would be nil additional growth elsewhere at Wymondham, i.e. nil additional growth to the north.

11.3 Establishing 'reasonable alternatives' for certain other settlements

11.3.1 As discussed above (Chapter 10), the Council reviewed its allocations in the wider Norwich Policy Area and found that there to be a site currently without planning permission at several settlements (four Service Villages and one Key Service Centre) that are currently set to exceed the JCS minimum target.

11.3.2 Table 11.1 shows Option 1 as the Council's 'submission' approach; and Option 2 as an approach that would involve a reduced allocation. In each instance, under Option 2 the allocation is reduced as far as possible given JCS requirements.

Table 11.1: Reasonable alternatives in relation to growth at certain other settlements

Settlement	Option 1 Approach to site allocation set out in the submitted plan	Option 2 Reduced allocation
Swardeston	30	20 (-10 dwellings at site SWA1)
Stoke Holy Cross	75	25 (-50 dwellings at site STO1)
Newton Flotman	30	12 (-18 dwellings at site NEW1)
Bracon Ash / Mulbarton	170	150 (-20 dwellings at site BRA1)
Poringland	320	300 (-20 dwellings at site POR4)
Total	**625**	**507 (-118 dwellings)**

Notes on these figures –

- At **Stoke Holy Cross**, planning permission was granted in 2012 for a site that includes part of site STO1, i.e. part of the site allocated in the submitted plan. Specifically, planning permission was granted for 25 homes within STO1 (leaving land for 50 homes unpermitted) and 24 homes on adjacent land. Also, permission was granted for 24 homes north of Long Lane. So, under **Option 1** the appraisal in fact needs to assume that 123 new homes will come forward at Stoke Holy Cross (i.e. 75 at STO1 plus 24 on adjacent land plus 24 north of Long Lane) and under **Option 2** the appraisal needs to assume 73 homes (i.e. 123 minus 50 unpermitted at STO1).
- At **Newton Flotman** planning permission was granted in 2008 for eight dwellings at another site (38 Olive Avenue), and it is anticipated that development will come forward. So, under **Option 1** the appraisal in fact needs to assume 38 new homes in the village; and under **Option 2** the appraisal needs to assume 20 homes.
- At **Bracon Ash / Mulbarton** a site (MUL1) allocated for 150 homes in the submitted plan in fact now has planning permission for 180 homes. So, under **Option 1** the appraisal in fact needs to assume 200 homes (i.e. 180 at MUL1 plus 20 at BRA1); and under **Option 2** the appraisal needs to assume 180 homes (at MUL1).
- At **Poringland**, planning permission was granted for 5 dwellings at Glebe Farm in 2011; 60 dwellings at land opposite Octagon Barn in 2012; 31 dwellings on Heath Loke in 2013; 250 dwellings on POR1 (which was allocated for 200) in 2013; and 7 dwellings at Long Lane in 2013. So, under **Option 1**, the appraisal in fact needs to assume 473 new homes (320 allocation plus 173 additional permissions); and under **Option 2** the appraisal needs to assume 453 new homes (i.e. 473 minus 20 homes at POR4).

11.3.3 Selection of Option 2 could potentially require the allocation of 118 additional dwellings at Wymondham or elsewhere; however it has been assumed that this would not necessarily be the case (given that the requirement to allocate land for the floating 1,800 would still have been met).[18]

[18] 2050 minus 118 = 1932 – still above 1800.

12 APPRAISING ALTERNATIVES

12.1 Introduction

12.1.1 This chapter presents summary appraisal findings in relation to the four sets of alternatives introduced above, and presents an overall conclusion with regards to alternatives appraisal.

12.2 Appraisal methodology

12.2.1 For each option, the appraisal identifies / evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see Part 1) as a methodological framework. **Red shading** is used to indicate significant negative effects, whilst **green shading** is used to indicate significant positive effects.

12.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and understanding of the baseline.[19] Given uncertainties there is inevitably a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted.

12.2.3 Assumptions are made cautiously, and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made even where it is not possible to distinguish between alternatives in terms of 'significant effects'.

12.2.4 Effects are predicted taking into account the criteria presented within Regulations.[20] So, for example, account is taken of the duration, frequency and reversibility of effects.

Key assumptions

12.2.5 Considerable assumptions are made regarding what can be achieved through development in terms of the delivery of infrastructure and 'planning gain' more generally. There is a general assumption made that large schemes will lead to funds being made available to mitigate many of the impacts associated with growth, deliver services / facilities that benefit residents and also deliver infrastructure that brings environmental benefits. In practice, there is considerable uncertainty in advance of detailed investigation.

[19] The implication being that it is difficult, if not impossible, to identify a 'cause-effect relationship' with any certainty.
[20] Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

12.3 Summary appraisal findings 1 – Broad approach to growth at Wymondham

12.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found in **Appendix 3**.

Table 12.1: Summary appraisal findings – Broad approach to growth at Wymondham

Objective	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
ENV1 Maintain and enhance biodiversity, geodiversity, species and habitat quality, and avoid habitat fragmentation	1	2	4	3
ENV2 Limit or reduce vulnerability to climate change, including minimising the risks from flooding	1	2	2	2
ENV3 Maximise the use of renewable energy solutions and reduce contributions to climate change	2	1	2	2
ENV4 Reduce the effect of traffic on the environment	2	2	2	1
ENV5 Improve air quality and minimise noise, vibration and light pollution	1	4	2	3
ENV6 Maintain and enhance the distinctiveness and quality of landscapes, townscapes and the historic environment	1	3	3	2
ENV7 Minimise the loss of undeveloped land and conserve and improve the quality of soil resources	1	2	4	2
ENV8 Improve water qualities and provide for sustainable sources of supply and sustainable use	N/a	N/a	N/a	N/a
ENV9 Minimise the production of waste and increase recycling	1	2	2	2
S1 Provide everybody with the opportunity to live in a decent, suitable and affordable home	2	1	1	1
S2 Reduce poverty, inequality and social exclusion	N/a	N/a	N/a	N/a
S3 Offer opportunities for all sections of the population to have rewarding and satisfying employment	N/a	N/a	N/a	N/a
S4 Improve accessibility to essential services, facilities and the workplace, particularly for those most in need	1	2	4	2
S5 Improve the education and skills of the population overall	1	2	3	3
S6 Improve the health of the population overall	1	4	2	3

Objective	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
S7 Encourage local community identity and foster mixed communities with co-operative attitudes, helping to reduce anti-social activity	1	1	**4**	**3**
S8 Improve the quality of where people live	N/a	N/a	N/a	N/a
EC1 Encourage sustained economic growth	**4**	1	**2**	**3**
EC2 Encourage and accommodate both indigenous and inward investment promoting a positive image of the District	N/a	N/a	N/a	N/a
EC 3 To encourage efficient patterns of movement in support of economic growth	1	4	2	3
EC 4 Improve the social and environmental performance of the economy	N/a	N/a	N/a	N/a
EC 5 To improve economic performance in rural areas	N/a	N/a	N/a	N/a

Summary

Additional growth at Wymondham can be seen to be a positive in terms of some objectives, although in some instances this conclusion is predicated on the location and scale of additional growth. Additional growth is likely to be a positive 'full stop' only in terms of: housing need related objectives, particularly given the permitted South of Wymondham scheme is unlikely to deliver on affordable housing targets; and economic growth objectives, given the location of Wymondham close to Norwich and Hethel, and given the town's excellent transport connections.

In terms of some other objectives, additional growth has the potential to lead to positive effects on the baseline, *but only if it is well located*. In terms of 'sustainable transport' related objectives, positive effects could result from a growth strategy that involves small extensions to the north (in proximity to a BRT route) and to the south-west (in proximity to the town centre and railway station); however, there could also be negative impacts given that growth would also likely lead to children having to travel to secondary schools away from Wymondham. In terms of one objective – the need to support innovative 'energy solutions' and hence reduced per capita energy use through the built environment – additional growth could lead to positive effects on the baseline if it is the case that a major new scheme comes forward (thereby enabling economies of scale), which in practice would likely mean delivering a major new scheme to the north (given that a focus of growth to the south-west would involve several smaller schemes promoted by different parties).

In terms of *the majority of objectives* it is suggested that 'nil additional growth' is the preferable to additional growth, regardless of where it is delivered.[1] Notably:

- Landscape and historic environment – growth would have negative effects on landscape, and potentially on the historic environment. Significant negative effects on landscape are certainly predicted for the options that would involve major growth focused at either the North or the South-west (plus there is a need to consider the risk of smaller scale growth to the north extending further out into open countrywide over time, given the scale of the land put forward here). In terms of the historic environment, sensitivities are primarily associated with 'Wymondham as a historic market town in a rural setting' and Gonville Hall to the south-west; and concerns are particularly associated with the option that would involve a large scheme to the south-west (which would necessitate a large scheme to the north of Gonville Hall). Finally, it is worth noting that impacts are predicted notwithstanding that there would probably not be significant implications for the key 'strategic considerations' locally, namely the setting of the Abbey or the Wymondham / Hethersett strategic gap.

[1] It is important to note that the option of 'nil additional growth' (which is essentially 'the baseline') is not assumed to be characterised by a situation whereby nil additional growth at Wymondham leads to increased pressure for additional growth elsewhere.

- Secondary school education – with 'significant' negative effects predicted given the known capacity constraints at Wymondham High School, and the potential for secondary impacts on social networks / community cohesion.

Other objectives in terms of which 'nil additional growth' is preferable are as follows –

- Biodiversity – with the appraisal highlighting that large scale growth to the north would probably be the least worst option
- Traffic congestion and associate environmental quality issues – with issues associated with large scale growth to the north in particular
- Accessibility to services/facilities - with issues associated with large scale growth to the south-west in particular (although sites to the north are also non-ideal)
- Health - with issues associated with large scale growth to the north in particular
- Loss of agricultural land – with issues associated with large scale growth to the south-west in particular
- Minor considerations relating to sustainable waste management (i.e. recycling/recovery) and flood risk.

12.4 Summary appraisal findings 2 – Growth at North Wymondham

12.4.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found in **Appendix 4**.

Table 12.2: Summary appraisal findings – Growth at North Wymondham

Objective	Nil	Low	Med	High	V high
ENV1 Maintain and enhance biodiversity, geodiversity, species and habitat quality, and avoid habitat fragmentation	☆ 1	2	2	2	5
ENV2 Limit or reduce vulnerability to climate change, including minimising the risks from flooding	☆ 1	2	3	4	5
ENV3 Maximise the use of renewable energy solutions and reduce contributions to climate change	3	3	3	2	☆ 1
ENV4 Reduce the effect of traffic on the environment	☆ 1	☆ 1	3	4	5
ENV5 Improve air quality and minimise noise, vibration and light pollution	☆ 1	2	3	4	5
ENV6 Maintain and enhance the distinctiveness and quality of landscapes, townscapes and the historic environment	☆ 1	2	2	4	5
ENV7 Minimise the loss of undeveloped land and conserve and improve the quality of soil resources	☆ 1	2	3	4	5
ENV8 Improve water qualities and provide for sustainable sources of supply and sustainable use	N/a	N/a	N/a	N/a	N/a
ENV9 Minimise the production of waste and increase recycling	☆ 1	2	3	4	5
S1 Provide everybody with the opportunity to live in a decent, suitable and affordable home	5	4	3	2	☆ 1

Objective	Nil	Low	Med	High	V high
S2 Reduce poverty, inequality and social exclusion	N/a	N/a	N/a	N/a	N/a
S3 Offer opportunities for all sections of the population to have rewarding and satisfying employment	N/a	N/a	N/a	N/a	N/a
S4 Improve accessibility to essential services, facilities and the workplace, particularly for those most in need	1	2	2	2	2
S5 Improve the education and skills of the population overall	1	2	3	4	5
S6 Improve the health of the population overall	1	2	3	4	5
S7 Encourage local community identity and foster mixed communities with co-operative attitudes, helping to reduce anti-social activity	1	5	4	3	1
S8 Improve the quality of where people live	N/a	N/a	N/a	N/a	N/a
EC1 Encourage sustained economic growth	5	4	3	2	1
EC2 Encourage and accommodate both indigenous and inward investment promoting a positive image of the District	N/a	N/a	N/a	N/a	N/a
EC 3 To encourage efficient patterns of movement in support of economic growth	1	2	3	4	5
EC 4 Improve the social and environmental performance of the economy	N/a	N/a	N/a	N/a	N/a
EC 5 To improve economic performance in rural areas	N/a	N/a	N/a	N/a	N/a

Summary

Additional growth to the north of Wymondham can be seen to be a positive in terms of some objectives, although in some instances this conclusion is predicated on the scale of additional growth. Additional growth is likely to be a positive 'full stop' only in terms of: housing need related objectives, particularly given the permitted South of Wymondham scheme is unlikely to deliver on affordable housing targets; and economic growth objectives, given the location of North Wymondham close to Norwich.

In terms of some other objectives, additional growth has the potential to lead to positive effects on the baseline (or at least avoid negative effects), *depending on the scale of growth.* In terms of one objective – the need to support innovative 'energy solutions' and hence reduced per capita energy use through the built environment – additional growth could lead to positive effects on the baseline if it is the case that a major new scheme comes forward (thereby enabling economies of scale). In terms of 'sustainable transport' related objectives a growth strategy that involves a small extension (in proximity to a BRT route) could mean that negative effects are avoided; however, there is uncertainty given that growth would also likely lead to children having to travel to secondary schools outside of Wymondham.

In terms of *the majority of objectives* it is suggested that 'nil additional growth' is preferable to additional growth, regardless of the scale.[1] Most notably:

- Landscape and historic environment – growth would have negative effects on landscape, with the likelihood of 'significant' negative effects predicted for options that would involve major growth (plus there is a risk that smaller scale growth to the north would extend further out into open countrywide over time

[1] It is important to note that the option of 'nil additional growth' (which is essentially 'the baseline') is not assumed to be characterised by a situation whereby nil additional growth at North Wymondham leads to increased pressure for additional growth elsewhere.

given the scale of land put forward here). These effects are predicted notwithstanding that there would not be significant implications for the Wymondham/Hethersett strategic gap.

- Secondary school education – with 'significant' negative effects predicted given the known capacity constraints at Wymondham High School, and the potential for secondary impacts on social networks / community cohesion.
- Accessibility to the town centre and railway station – the northern sites are some distance away from the town centre and although reachable by bus, walking and cycling, northern sites may not provide the "easy access" to the town centre that JCS Policy 10 requires and there is potential for development in this part of Wymondham to perhaps look more towards Norwich for some services

Other objectives in terms of which 'nil additional growth' is preferable, and in terms of which a low growth option can be considered the 'least worst' option if it is the case that additional growth is necessary, are as follows:

- Health
- Traffic congestion and associate environmental quality issues
- Loss of agricultural land
- Minor considerations on sustainable waste management (i.e. recycling/recovery) and flood risk (a *minor* consideration).

12.5 Summary appraisal findings 3 – Growth at South-west Wymondham

12.5.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found in **Appendix 5**.

Table 12.3: Summary appraisal findings – Growth at South-west Wymondham

Objective	Nil	Site F	Site G	Site H	Site H/I	Sites F & G	Sites G & H	Sites F & H	Sites F, G & H	Sites F & H/I	Sites G & H/I	Sites F, G & H/I
ENV1 Maintain and enhance biodiversity, geodiversity, species and habitat quality, and avoid habitat fragmentation	1	2	4	2	4	7	7	6	10	9	10	12
ENV2 Limit or reduce vulnerability to climate change, including minimising the risks from flooding	1	2	2	2	5	5	5	5	9	9	9	12
ENV3 Maximise the use of renewable energy solutions and reduce contributions to climate change	5	5	5	5	1	5	5	5	5	1	1	1
ENV4 Reduce the effect of traffic on the environment	2	3	1	3	5	6	6	8	9	11	10	12
ENV5 Improve air quality and minimise noise, vibration and light pollution	1	2	2	2	5	5	5	5	9	9	9	12
ENV6 Maintain and enhance the distinctiveness and quality of landscapes, townscapes and the historic environment	1	3	2	3	9	5	5	5	8	10	10	12

Objective	Nil	Site F	Site G	Site H	Site H/I	Sites F & G	Sites G & H	Sites F & H	Sites F, G & H	Sites F & H/I	Sites G & H/I	Sites F, G & H/I
ENV7 Minimise the loss of undeveloped land and conserve and improve the quality of soil resources	1	2	2	2	5	5	5	5	9	9	9	12
ENV8 Improve water qualities and provide for sustainable sources of supply and sustainable use	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
ENV9 Minimise the production of waste and increase recycling	1	2	2	2	5	5	5	5	9	9	9	12
S1 Provide everybody with the opportunity to live in a decent, suitable and affordable home	12	9	9	9	5	5	5	5	2	2	2	1
S2 Reduce poverty, inequality and social exclusion	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
S3 Offer opportunities for all sections of the population to have rewarding and satisfying employment	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
S4 Improve accessibility to essential services, facilities and the workplace, particularly for those most in need	1	3	2	3	7	5	5	7	9	11	9	12
S5 Improve the education and skills of the population overall	1	2	2	2	5	5	5	5	9	9	9	12
S6 Improve the health of the population overall	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
S7 Encourage local community identity and foster mixed communities with co-operative attitudes, helping to reduce anti-social activity	1	2	1	2	2	2	2	2	2	2	2	2
S8 Improve the quality of where people live	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
EC1 Encourage sustained economic growth	12	9	9	9	5	5	5	5	2	2	2	1
EC2 Encourage and accommodate both indigenous and inward investment promoting a positive image of the District	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
EC 3 To encourage efficient patterns of movement in support of economic growth	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a

Objective	Nil	Site F	Site G	Site H	Site H/I	Sites F & G	Sites G & H	Sites F & H	Sites F, G & H	Sites F & H/I	Sites G & H/I	Sites F, G & H/I
EC 4 Improve the social and environmental performance of the economy	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
EC 5 To improve economic performance in rural areas	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a

Summary

Additional growth to the south-west of Wymondham can be seen as a positive in terms of some objectives, although in some instances this conclusion is predicated on the scale and location of additional growth. Additional growth is likely to be a positive 'full stop' only in terms of: housing need related objectives, particularly given the permitted South of Wymondham scheme is unlikely to deliver on affordable housing targets; and economic growth objectives, given the location of Wymondham close to Hethel and Norwich.

In terms of some other objectives, additional growth has the potential to lead to positive effects on the baseline (or at least avoid negative effects), *depending on the scale and location of growth.* In terms of 'sustainable transport' related objectives a growth strategy that focuses on accessibility to the train station and town centre could lead to positive effects; however, there is uncertainty given that growth would also likely lead to children having to travel by car/bus to secondary school.

In terms of *the majority of objectives*, it is suggested that 'nil additional growth' is preferable to additional growth, regardless of the scale.[1] Most notably:

- Landscape and historic environment – growth would have negative effects, with the likelihood of significant negative effects on the historic environment (although there are also linked 'landscape' considerations) predicted for options that would involve a large scheme to the north of Gonville Hall.
- Secondary school education – with 'significant' negative effects predicted given the known capacity constraints at Wymondham High School, and the potential for secondary impacts on social networks / community cohesion.

Other objectives in terms of which 'nil additional growth' is preferable, and in terms of which a low growth option can be considered the 'least worst' option if it is the case that additional growth is necessary, are as follows –

- Accessibility to services/facilities
- Car dependency / per capita carbon emissions from transport
- Loss of agricultural land
- Traffic congestion and associate environmental quality issues
- Minor considerations relating to sustainable waste management (i.e. recycling/recovery) and flood risk

12.6 Summary appraisal findings 4 – Certain other settlements

12.6.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found in **Appendix 6**.

Table 12.4: Summary appraisal findings – Certain other settlements

Objective	Option 1 as submitted	Option 2 reduced allocation
ENV1 Maintain and enhance biodiversity, geodiversity, species and habitat quality, and avoid habitat fragmentation	1	1

[1] It is important to note that the option of 'nil additional growth' (which is essentially 'the baseline') is not assumed to be characterised by a situation whereby nil additional growth at Wymondham leads to increased pressure for additional growth elsewhere.

Objective	Option 1 as submitted	Option 2 reduced allocation
ENV2 Limit or reduce vulnerability to climate change, including minimising the risks from flooding	1	1
ENV3 Maximise the use of renewable energy solutions and reduce contributions to climate change	N/a	N/a
ENV4 Reduce the effect of traffic on the environment	2	1
ENV5 Improve air quality and minimise noise, vibration and light pollution	2	1
ENV6 Maintain and enhance the distinctiveness and quality of landscapes, townscapes and the historic environment	2	1
ENV7 Minimise the loss of undeveloped land and conserve and improve the quality of soil resources	2	1
ENV8 Improve water qualities and provide for sustainable sources of supply and sustainable use	N/a	N/a
ENV9 Minimise the production of waste and increase recycling	N/a	N/a
S1 Provide everybody with the opportunity to live in a decent, suitable and affordable home	N/a	N/a
S2 Reduce poverty, inequality and social exclusion	1	2
S3 Offer opportunities for all sections of the population to have rewarding and satisfying employment	1	2
S4 Improve accessibility to essential services, facilities and the workplace, particularly for those most in need	2	1
S5 Improve the education and skills of the population overall	1	2
S6 Improve the health of the population overall	2	1
S7 Encourage local community identity and foster mixed communities with co-operative attitudes, helping to reduce anti-social activity	1	2
S8 Improve the quality of where people live	N/a	N/a
EC1 Encourage sustained economic growth	N/a	N/a
EC2 Encourage and accommodate both indigenous and inward investment promoting a positive image of the District	N/a	N/a
EC 3 To encourage efficient patterns of movement in support of economic growth	N/a	N/a
EC 4 Improve the social and environmental performance of the economy	N/a	N/a
EC 5 To improve economic performance in rural areas	1	2

Summary
The appraisal highlights that Option 1 performs best in terms of most socio-economic objectives, specifically those relating to the vitality of rural communities and the rural economy. Car dependency can be anticipated, but it is noted that there would be good potential to access employment at not-to-distant locations. Whilst it is recognised that there could be merit to reducing growth in the rural area in terms of some environmental objectives, it is not thought that the scale of additional growth under Option 1 (118 dwellings in total, spread across five sites) leads to major concerns. Even in settlements such as Stoke Holy Cross, where Option 1 is significantly different than the reduced allocation in Option 2, it is considered that this would be unlikely to cause any significant sustainability issues or problems. There is no evidence that additional housing in Stoke Holy Cross, or any of the other settlements in Table 11.1, would lead to unacceptable pressures on services and facilities such as schools and doctors or lead to the exacerbation of problems such as flooding.

12.7 Alternatives appraisal conclusions

12.7.1 Three alternatives appraisal tables have been prepared in relation to growth at Wymondham. This is deemed the most appropriate way to present things; however, the three tables could potentially be merged into one. If this approach was taken, then it would be seen that essentially the following alternatives have been appraised:

- Nil growth
- 150 dwellings at Site A
- 150 dwellings at Site F
- 150 dwellings at Site G
- 150 dwellings at Site H
- 300 dwellings at Sites A and B
- 300 dwellings at Sites F and G
- 300 dwellings at Sites G and H
- 300 dwellings at Sites F and H
- 300 dwellings at Site H/I
- 450 dwellings at Sites F, G and H
- 450 dwellings at Sites F and H/I
- 450 dwellings at Sites G and H/I
- 500 dwellings at Sites A, B and C
- 600 dwellings at Sites F, G and H/I
- 800 dwellings at Sites A, B, C, D and E
- Up to 600 - 800 dwellings split between north and south (sites not defined)

12.7.2 Headline appraisal findings, in relation to this set of 17 alternatives, are as follows:

- In terms of **carbon emissions / climate change mitigation**, large scale growth to the north might lead to opportunities for designing-in ‘energy solutions’ (perhaps a small combined heat & power plant); however, considerable car dependency could be expected (given that the centre-point of the development would be distant from the existing built up area / BRT corridor). Medium scale growth, with well-located small extensions to the north and/or south-west (at Site G) might be a positive from a car dependency / per capita transport emissions perspective.

- Larger scale growth to the north could give rise to problems of **traffic** congestion (potentially with implications for environmental quality) although this is uncertain. Larger scale growth to the south-west might also result in some problems.
- Major growth in either direction would impact in terms of important **landscape / heritage** considerations; however, small scale growth in either direction could be accommodated (given mitigation measures). If small or medium scale growth were to be supported, then sites A and G perform marginally better than sites F and H. A slightly larger scheme to the north might also be accommodated without leading to 'sprawl' into open countryside.
- Additional growth would lead to benefits in terms of addressing local **housing** needs (the more the better) including affordable housing needs.
- Large scale growth to the south-west would be problematic in terms of **access to services/facilities** given the isolation of most of the sites under consideration (albeit a good bus service can be assumed). Growth to the north would also be far from ideal (particularly a large scheme, which would stretch away from the existing settlement boundary) in terms of easy access to the town centre and railway station (although it is acknowledged that it is accessible by bus, walking and cycling) and there would be a danger that residents there would look towards Norwich for many of their services.
- Any additional growth is a negative in terms of access to **secondary school education**, and the scale of negative effects is correlated to the scale of growth. Growth to the north is slightly preferable to growth to the south-west, given relative proximity to Hethersett High Academy compared to Attleborough Academy (although there is no certainty that Hethersett High and/or Attleborough Academy would have capacity to accept any additional pupils from Wymondham).
- Large scale growth to the north would impact negatively on access to **green / open space** for existing residents of Wymondham (although mitigation would be possible).
- Additional housing growth at Wymondham would support the achievement of **economic growth** objectives (the more the better), with growth focused to the north preferable.
- Lesser considerations relate to **biodiversity** (nil growth is preferable and growth to the north is probably preferable to the south-west); **flood risk** (no major issues, but nil growth is preferable); **agricultural land** (small scale growth to the north could be accommodated mostly on land that is either previously developed or currently sports pitches); and **waste management** (constraints exist locally, which weighs against additional growth).

12.7.3 With regards to Poringland (a Key Service Centre) and the certain Service Villages that have been under consideration, it is difficult to draw conclusions with any certainty; but it is generally the case that a lower approach to growth (Option 2 from Table 12.4) might be preferable in terms of a range of environmental objectives, but in terms of community and 'rural economy' objectives there is benefit to delivering growth at smaller settlements.

13 DEVELOPING PROPOSED MAIN MODIFICATIONS

13.1 Introduction

13.1.1 The aim of this Chapter is to explain the Council's reasons for selecting / developing the preferred approach – as reflected in the schedule of Proposed Main Modifications currently published for consultation – in light of the appraisal of alternatives, and other sources of evidence.

13.2 The Council's reasons for developing the Proposed Main Modifications

Overview

13.2.1 The development of the Proposed Main Modifications has taken place since formal submission of the three Local Plan documents. The changes proposed have arisen from a number of sources:

- In response to some of the pre-submission representations made (these were not sufficient to justify further pre-submission work and re-consultation but the Council feels, on reflection, that some appropriate changes could/should be made);
- In response to the Inspector's Initial Questions to the Council dated 30 June 2014;
- In response to questioning from the Inspector and debate at the Hearing sessions;
- In response to the Inspector's letter to the Council of 17 December 2014, which set out his "initial thoughts" on a number of further main modifications that he feels are necessary to make the Plan sound;
- As a result of further updates since the end of the Hearing sessions (some of these are consequent changes caused through the need for consistency throughout the Local Plan documents).

13.2.2 The Council has also reflected on the contents of the Sustainability Appraisal Addendum work, which has tested reasonable alternatives to the distribution of the 'floating 1,800' dwellings in the South Norfolk part of the Norwich Policy Area.

Detailed response to the alternatives appraisal

13.2.3 As described in Tables 12.1 to 12.3, and Section 12.7 of this document, the main advantages of more housing in Wymondham are (with the scale of the advantages obviously depending on the scale of additional growth):

- Meeting housing-related needs, including affordable housing;
- Helping deliver economic growth;
- (Depending on where exactly development is located) potential positive impacts on sustainable transport-related objectives such as accessibility to Bus Rapid Transit (although there would also be likely to be negative transport impacts if children would have to travel to secondary schools outside Wymondham); and
- (If major new schemes as opposed to piecemeal development took place) potential positive impacts on innovative "energy solutions" and reduced per-capita energy use in the built environment.

13.2.4 The main disadvantages of more housing in Wymondham (with the scale of the disadvantages tending to increase with additional growth quanta and also being partly dependent on precisely where growth would be) are:

- Although there would likely not be significant impacts on the setting of Wymondham Abbey and the Wymondham/Hethersett Strategic Gap (at least when judged on the particular site options assessed in the SA Addendum – some other options being promoted for inclusion in

the Wymondham Area Action Plan would have potentially significant negative impacts), growth would have negative effects on the landscape of Wymondham and also Wymondham's historic environment unless limited and carefully located;

- Given the known capacity constraints of Wymondham High Academy and its inability to expand any further beyond 2,050 pupils arising from approximately 2,500 new dwellings (on its land-locked site), it is not known precisely which alternative high school any additional pupils could attend. Growth at both nearest high schools (Hethersett and Attleborough) is based on current commitments (allocations and permissions) and further expansion on the existing sites cannot be guaranteed. There could therefore be transport impacts caused by pupils potentially needing to travel long distances to attend secondary schools away from Wymondham through, principally, bus or car journeys. There would also be potential impacts (albeit perhaps limited in scale) on social cohesion caused by pupils being 'divided' on leaving primary school with potentially not all pupils being able to attend one of the two Wymondham high schools; and
- Negative impacts on traffic congestion with associated environmental impacts (dependent on scale and location); loss of agricultural land (although there is some potential to avoid impacts through a very small scheme to the north); impacts on biodiversity (not likely to be major); and negative impacts on accessibility to services/facilities (under some options).

13.2.5 With regards to Key Service Centres and Service Villages the appraisal (see Table 12.4 and Section 12.7) highlights that the existing preferred approach performs best in terms of socio-economic objectives, and this is an important consideration for the Council. Maintaining the vitality of rural areas and communities is a long term ambition. Whilst it is recognised that there could be merit to reducing growth in the rural area in terms of some environmental objectives and in terms of pure economic growth objectives (given that there might be consequential additional growth at higher order settlements), it is not thought that any benefits would be significant. Even taking into account the potential for 'in-combination' effects associated with development at allocated sites alongside development at sites with planning permission, there is no evidence to suggest that growth at any of the villages will lead to unacceptable pressures on services and facilities such as schools and doctors, or lead to the exacerbation of problems such as flooding.

13.2.6 The Council concludes that, of the alternatives tested for the distribution of the 'floating 1,800' dwellings, the most appropriate option is the Pre-Submission distribution of housing taking into account commitments (i.e. planning permissions) on allocated and non-allocated sites as of April 2014.. Taking into account the findings of the original SA Reports and the 'SA Addendum' work, the benefits generated through additional housing in Wymondham (principally delivering housing and affordable housing and economic growth) are outweighed by the negative impacts of this growth – principally the impact on high schooling (caused by lack of capacity for Wymondham High Academy to expand any further) but also the impacts on Wymondham's landscape and historic setting and potential increased traffic congestion and pollution. The benefits of reducing allocations in certain Key Service Centres and Service Villages (by a relatively modest 118) are also concluded to be outweighed by the disadvantages, particularly the impact on the delivery of local infrastructure and loss of affordable housing in rural areas (a key part of rural social and economic sustainability).

PART 3: WHAT ARE THE SA FINDINGS AT THIS STAGE?

14 INTRODUCTION

14.1.1 This 'Part' of the SA Report presents appraisal findings in relation to the Proposed Main Modifications that are currently out to consultation.

15 APPRAISAL OF THE PROPOSED MAIN MODIFICATIONS

15.1 Screening

15.1.1 A first step involved screening-out those Proposed Main Modifications that do not affect the 'substance' of the policy approach being proposed and/or have no potential to have an effect in terms of strategic sustainability issues/objectives. Proposed Main Modifications that were screened out can be categorised as one of the following:

- Technical clarification (e.g. updates to referenced documents etc.)
  - In many instances proposed modifications update text to reflect the fact that planning permission has now been granted for a particular site. Such modifications cannot be said to have an effect, although they do mean that there is a need to review the appraisal of the draft plans presented within the published/submitted SA Reports.[21]
- Procedural clarifications (e.g. additional supporting text on how a policy would be implemented, without altering policy wording itself)
- Minor changes to policy wording that would not alter how a policy would be expected to be interpreted and/or implemented (e.g. changes to policy wording and/or supporting text to improve readability or to remove ambiguous wording).

15.1.2 A precautionary approach was taken to screening so that any uncertainty as to whether a Proposed Main Modification could lead to new or changed significant environmental effects resulting in the modification being screened in and being subject to further appraisal. **Appendix 7** presents more information on the screening process.

15.1.3 It is also worth noting that 'Additional Modifications' were automatically screened-out, on the basis that they are not Main Modifications. The Inspector has already determined that Additional Modifications do not have a bearing on plan soundness, and so by implication it is fair to assume that they do not have a bearing on the sustainability baseline.

[21] i.e. if the SA Report concluded that the draft plan would likely lead to a significant positive effect because of a proposed allocation, but that allocation is now a planning permission, then there is a need to revise the predicted effect and vice versa.

15.2 Methodology

15.2.1 The appraisal identifies and evaluates 'likely significant effects' of the Proposed Main Modifications (that are 'screened-in'; see discussion above) on the baseline, drawing on the SA objectives identified through scoping (see Part 1) as a methodological framework.

15.2.2 As such, the appraisal is presented below as a series of 15 narratives, with each narrative relating to a particular SA objective. No narratives are presented for seven of the SA objectives identified through scoping, as it is not possible to conclude anything with regards to likely significant effects. In other words, 7 of the 22 SA objectives established through scoping are 'screened-out' for the purposes of appraising Proposed Main Modifications - see **Box 15.1**.

Box 15.1: Screening-out non-relevant SA objectives

The proposed main modifications (that are screened-in) are appraised under 15 SA objective headings. Whilst the SA framework, developed through scoping, comprises seven other SA objectives, these are of less relevance here given the relatively narrow scope of the proposed main modifications, and hence are screened out for the purposes of conciseness.

The SA objectives screened-out are: ENV9 *Minimise the production of waste and increase recycling*; S3 *Offer opportunities for all sections of the population to have rewarding and satisfying employment*; S7 *Encourage local community identity and foster mixed communities with co-operative attitudes, helping to reduce anti-social activity*; EC2 *Encourage and accommodate both indigenous and inward investment promoting a positive image of the District*; EC 3 *To encourage efficient patterns of movement in support of economic growth*; EC 4 *Improve the social and environmental performance of the economy*; and EC 5 *To improve economic performance in rural areas*.

Four of the screened-out objectives are economic ('EC') objectives, and another (S3) relates to employment. All of the economic objectives are interrelated, and hence it is considered appropriate to have just one discussion of the effects of the proposed modifications in terms of economic objectives (under EC1: *Encourage sustained economic growth*).

15.2.3 The focus of the appraisal is on 'the Proposed Main Modifications' (given that it is these that are currently the focus of consultation); however, explicit consideration is also given to the effects of 'the Local Plan as modified' (i.e. the cumulative effects of the Proposed Main Modifications and the rest of the Local Plan, which will likely be adopted in an unmodified form).

15.2.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and understanding of the baseline.[22] Given uncertainties there is inevitably a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted.

15.2.5 Assumptions are made cautiously, and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) of the proposal in more general terms.

15.2.6 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.[23] So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the Local Plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the appraisal as appropriate.

[22] The implication being that it is difficult, if not impossible, to identify a 'cause-effect relationship' with any certainty.
[23] Environmental Assessment of Plans and Programmes Regulations 2004

Reasonable alternatives?

15.2.7 It is important to be clear that the appraisal below relates to the Proposed Modifications, and there is no discussion of alternatives (although recommendations are made regarding how the preferred approach might be improved by some small changes). Part 2 of this report discusses the merits of alternatives in relation to the 'headline' issue of distributing development in-line with JCS targets. For other more specific plan issues it is appropriate for the preferred approach – i.e. the approach reflected in Proposed Main Modifications – to have been developed without formal alternatives appraisal, particularly given that many reflect a consensus reached during Examination Hearings.

15.3 ENV1 Maintain and enhance biodiversity, geodiversity, species and habitat quality, and avoid habitat fragmentation

Appraisal commentary

15.3.1 WAAP MM14 deals with the introductory text to the 'Enhancing the Provision of Green Infrastructure around Wymondham' section of the AAP. Additional text is proposed to reflect the fact that policies WYM 8-11 are aspirational in nature and that it will not be appropriate for all new development in the town to contribute towards green infrastructure provision. MM15 – MM18 then deal with consequential changes to policies.

15.3.2 The changes do amount to a watering-down of policy stringency, from a 'biodiversity' perspective. It is also noted that: A) Under MM15, the policy wording in WYM8 will be changed to refer to Green Infrastructure 'requirements' rather than 'enhancements'; and B) reference to specific projects that should be supported in South Wymondham will be replaced with more generic text ("Explore biodiversity enhancement and green infrastructure accessibility projects to the south of the WYM 3 housing allocation").

15.3.3 Elsewhere -

- SITES MM11 – the development boundary at Costessey has been modified to exclude the County Wildlife Site. The previous approach involved simply relying on a site specific policy (COS3) requirement to ensure protection of the site.
- SITES MM43 (SCO1) – the size of the allocation has been increased, which is notable as it is understood that biodiversity considerations were a key factor in this decision. The decision has been made in-light of discussions with the Council's Ecologist over ecological issues on the site.
- SITES MM55 – the development boundary at Marlingford & Colton has been modified to exclude the County Wildlife Site.

Summary appraisal of the Proposed Main Modifications

15.3.4 The proposal to reduce the stringency of requirements on planning for green infrastructure (GI) at Wymondham is notable, but is of limited significance. There will remain good potential to take a proactive approach in-line with the Wymondham GI map. It is **recommended** that planning for GI at Wymondham should be a particular focus of monitoring efforts.

15.3.5 There is no reason to suggest that any site specific proposed modifications, or modifications that are otherwise supportive of development, will lead to negative implications for biodiversity.

Implications for the appraisal of the Local Plan?

15.3.6 The SA Reports published / submitted alongside the three Local Plan documents concluded that there would not be any significant effects in relation to SA objective ENV1 although the DMPD SA Report noted that *"decisions makers should be cautious of the cumulative effect of many smaller less serious impacts over the longer term"*. This conclusion holds true for 'the Local Plan as modified'.

15.4 ENV2 Limit or reduce vulnerability to climate change, including minimising the risks from flooding

Appraisal commentary

15.4.1 The decision has been taken (SITES MM51 and WAAPMM28) to amend the development boundaries in a number of settlements to include land falling within flood zones 2 and 3. This is on the basis that issues relating to flood risk are adequately covered by JCS and national policy / need not be covered by South Norfolk-specific 'Countryside' DM policy. The settlement boundaries have been altered for 30 settlements, and as a consequential change a host of supporting text describing flood risk will be deleted. At one settlement (Langley) a settlement boundary will now be put in place (whereas previously it was thought that not appropriate given flood risk) although text will specify that: *"Much of the developed area lies within Flood Zones 2 and 3 which is likely to restrict any potential for further infill development."*

15.4.2 Related to the above, DM MM12 notes that some land within development boundaries may still be within flood risk zones and provides clarity that this will be taken into account in planning decisions where it is relevant material consideration, in accordance with the NPPF and the JCS.

15.4.3 With regards to site specific policy, SITES MM23 and MM24 (DIS2) are notable. The site in question is associated with flood risk issues, but there is now clarification that a maximum of 10-15 dwellings (covering up to around 0.5 hectares) will be acceptable in order to enable the site to be released for open space, green space and an extension to the riverside walk (i.e. acceptable only in so far as it is 'enabling development'). There will be a requirement that residential development is located in land in Flood Zone 1 and that: *"Some limited re-profiling of land would be acceptable in principle to ensure that an appropriately-shaped area of land for development in Flood Zone 1 is available (including access road), so long as the result would be no net loss of floodplain storage."*

15.4.4 It is also notable that in Gillingham, there is now clarification (SITES MM41) that *"The new housing allocation is only for 10 dwellings due to the restricted amount of land that is within Flood Risk Zone 1."*

Summary appraisal of the Proposed Main Modifications

15.4.5 There is no reason to suggest that any site specific proposed modifications, or modifications that are otherwise supportive of development, will lead to negative implications for flood risk.

15.4.6 The decision to include land at risk of flooding within settlement boundaries is notable, but it is not possible to conclude that there will be significant implications for flood risk. There will be good potential to take flood risk considerations into account at the planning application / development management stage.

Implications for the appraisal of the Local Plan?

15.4.7 The SA Reports published / submitted alongside the three Local Plan documents concluded that there would not be any significant effects in relation to SA objective ENV2 although it is noted that the SSADP SA Report concluded that the sites in Diss (including site DIS2) and Gillingham would have some positive effects. This conclusion holds true for 'the Local Plan as modified'.

15.5 ENV3 Maximise the use of renewable energy solutions and reduce contributions to climate change

Appraisal commentary

15.5.1 DM MM55 removes Policy DM4.1 (and supporting text) on the basis that the policy has been made redundant by changes to national policy on energy efficiency. The previously proposed policy read:

Policy DM 4.1 Building Fabric Energy Efficiency, Carbon Compliance and Allowable Solutions

Those development proposals assessed under the Building Regulations to be required to make verified contributions to Allowable Solution measures will be required to offer 'first refusal' of that contribution to the local Allowable Solutions scheme established by the Council.

In the event that the Council does not set up a local scheme or declines the contribution, the verified contribution will be discharged through Private Energy Fund and documentation of this submitted to the Council prior to the occupation of the development.

The Council will adopt supplementary guidance to detail the operation of any scheme established.

Summary appraisal of the Proposed Main Modifications

15.5.2 There is no reason to suggest that any site specific proposed modifications, or modifications that are otherwise supportive of development, will lead to negative implications for climate change mitigation objectives.

15.5.3 The decision to remove a DM policy that was looking to implement a locally specific approach to carbon compliance is notable, but it is not possible to conclude that there will be significant implications given that National Policy now means that the policy would have been non-implementable. It is **recommended** that the Council does not 'lose momentum' with regards to this issue, and to this end undertakes work to establish precisely what can be achieved through local policy (given the national policy framework). The aim should be to ensure that a suitably proactive approach can be implemented through the forthcoming Plan Review.

Implications for the appraisal of the Local Plan?

15.5.4 The SA Reports published / submitted alongside the three Local Plan documents concluded that there would not be any significant effects in relation to SA objective ENV3 although it is noted that the DMDP SA Report concluded that Policy DM4.1 would have very positive effects with respect to ENV3. This conclusion holds true for 'the Local Plan as modified'.

15.6 ENV4 Reduce the effect of traffic on the environment

Appraisal commentary

15.6.1 With regards to site specific policy, SITES MM46 (BAW20) involves a new requirement to deliver a cycle link. This reflects Norwich City Council's suggestions for sustainable transport links to surrounding residential development.

Summary appraisal of the Proposed Main Modifications

15.6.2 There is no reason to suggest that any site specific proposed modifications, or modifications that are otherwise supportive of development, will lead to negative implications in terms of car dependency / distance travelled by private car, or on the rate of 'modal shift' towards more sustainable modes of transport.

15.6.3 Whilst supporting and encouraging sustainable transport is a major focus of the Local Plan, it is not a focus of the Proposed Modifications.

Implications for the appraisal of the Local Plan?

15.6.4 The SA Reports published / submitted alongside the three Local Plan documents concluded that there would not be any significant effects in relation to SA objective ENV4. The SSAPD SA Report concluded that the site allocation at Bawburgh (including site BAW2) would lead to neutral effects with respect to SA Objective ENV4. This conclusion holds true for 'the Local Plan as modified'.

15.7 ENV5 Improve air quality and minimise noise, vibration and light pollution

Appraisal commentary

15.7.1 DM MM57 relates to Policy DM4.2 (Renewable Energy). The proposed modification would strengthen the requirement for proposals to take into account noise, outlook, and overbearing effect or unacceptable risk to health or amenity (e.g. vibration and/or light pollution etc.) by way of other pollutants such as dust and odour.

Summary appraisal of the Proposed Main Modifications

15.7.2 There is no reason to suggest that any site specific proposed modifications, or modifications that are otherwise supportive of development, will lead to negative implications for environmental quality. The proposed modification to DM policy will have positive implications.

Implications for the appraisal of the Local Plan?

15.7.3 The SA Reports published / submitted alongside the three Local Plan documents concluded that there would not be any significant effects in relation to SA objective ENV5 although it is noted that the DMDP SA Report concluded there would be some positive effects. This conclusion holds true for 'the Local Plan as modified'.

15.8 ENV6 Maintain and enhance the distinctiveness and quality of landscapes, townscapes and the historic environment

Appraisal commentary

15.8.1 With regards to development management (DM) policies:

- DM MM14, MM15 and MM16 all relate to the protection of the openness of the countryside from inappropriate development, as well as landscape character more generally. The modifications proposed to Policy DM 1.3 (The sustainable location of new development) strengthen the focus on promoting development within existing settlement boundaries and resisting development outside those boundaries. MM15 provides clarify on instances where development outside of these boundaries may be appropriate, while MM16 strengthens the requirement to consider the 'character of the Broads' where it is a relevant consideration.
- DM MM20 removes the requirement for a sequential test from Policy DM 2.1 (Employment and business development) for small scale rural offices or other small scale rural development. While this relaxes planning controls on development outside existing settlement boundaries this only applies to small scale development and would not therefore be likely to have adverse effects on landscape or townscape.
- DM MM29 proposes a change to Policy DM 2.8 (Equestrian and other small rural land based activities) introducing a higher threshold for refusing planning permission for a change of use. The modification would raise the threshold to significant adverse effects with respect to visual appearance of the countryside and public rights of way or the areas of urban / rural transition.
- DM MM31 and DM MM32 both relate to the wording and supporting text to Policy 2.11 (Agricultural and other occupational dwellings in the countryside). The modifications support a requirement on applicants to demonstrate a functional linking between the farm enterprise and any new dwellings as well as providing evidence on the long-term financial viability of the farming enterprise.
- DM MM33 proposed changes to Policy DM2.12 (Tourist accommodation) to ensure the policy has sufficient clarity as to where the location of new holiday accommodation will be acceptable.
- DM MM56 and MM57 both relate to policy guidance for Policy DM4.2 (Renewable Energy). MM56 would require that Policy DM4.11 (Heritage Assets) would apply to proposed renewable energy development considered under Policy DM4.2. Along with the change proposed by MM57, this would strengthen the requirement for proposals to take into account the character and appearance of the landscape and the values of heritage assets.
- DM MM61 provides for additional guidance under Policy DM 4.6 (Landscape Character and River Valleys) by requiring development proposals to take into account the key findings of the South Norfolk Landscape Assessment (2001, as updated by the 2012 review).
- DM MM63 would clarify what forms of development may be acceptable within the strategic gaps to make Policy DM4.8 more effective.
- DM MM67 and MM68 both relate to Policy DM 4.11 (Heritage Assets) and propose changes to reflect the significance of the Listed Buildings Act 1990 in relevant planning applications. These two modifications will align the local plan more closely with the NPPF with regards to listed buildings.
- DM MM69 would amend Policy 4.7 (Landscape Setting of Norwich) to remove land allocated for residential development in the 'made' Cringleford Neighbourhood Development Plan and allocations at Trowse and Keswick and land from the Norwich Southern Bypass Landscape Protection Zone (NSBLPZ). The modification would also designate land previously proposed for allocation at Colney Hall as part of the NSBLPZ. Map DM4.7 would also be amended accordingly.

- DM MM70 and MM71 both relate to amending the boundaries of two strategic gaps which are the subject of Policy DM4.8. MM70 would amend the boundary of the strategic gap at Cringleford (Burnthouse Lane) so that it reflects that outlined in the Chris Blandford Associates report and allows for the development of the housing allocation in the Cringleford Neighbourhood Plan; whilst MM71 would remove land from the strategic gap that does not need to be kept open to protect the separation between Wymondham and Hethersett.

15.8.2 With regards to Wymondham, WAAP MM23 and MM24 are notable, as they deal with the decision to delete Policy WYM17 'Preserving and enhancing the historic character of Wymondham town centre'. New supporting text is set to be put in place to explain the change, as follows:

"It is not proposed to have a bespoke policy relating to preserving and enhancing the historic character of the town centre as it is considered that this is adequately covered by policies in the Development Management document (specifically Policy DM4.11), the NPPF and the Council's Placemaking Guide and Conservation Area Appraisal. The Council will actively pursue opportunities to preserve and enhance the historic character of the town centre conservation area through all means available including i) securing enhancements to the town centre and its public realm through developer contributions and other sources ii) proactively addressing heritage assets at risk and iii) utilising the Wymondham conservation area appraisal and management plan to achieve positive results. Development proposals that could affect heritage assets will be considered against policy DM4.11, national policy and guidance and JCS Policy 2 as relevant."

15.8.3 With regards to site specific policy, the following points are noted -

- WAAP MM10 (WYM3) - there will now be a requirement for development to take into account the Lizard Conservation Area.
- SITES MM9 (EAS1) – there will now be enhanced heritage related policy criteria, with a new requirement that: "Application to be accompanied by an assessment of the significance of St Peter's Church as a heritage asset, the extent of its setting and the contribution that its setting makes to its significance."
- SITES MM14 (COS5) – there will now be slightly less stringent wording to reflect that fact that minor building works would erode the open character to a limited degree, but may be necessary to support the function of the Showground.
- SITES MM17 (HET3) – there is now increased clarity on how best to progress the site (which will remain open or may be enhanced as informal open space) whilst conserving archaeological assets.
- SITES MM18 (HET4) – the specific reference to reinforcing the strategic gap between Hethersett and Wymondham will be removed. Instead, a more general requirement will be in place: *"Landscaping must provide a suitable interface with the surrounding countryside."*
- SITES MM21 (TROW1) – new text leads to the possibility of an access point from Hudson Avenue' provided that it is 'very limited' and it can be demonstrated that it would not 'harm the character and appearance of the Conservation Area'. Another amendment, as part of MM2, specifies that development must be set back, given the Conservation Area.
- SITES MM40 (Policy BKE3) will now require that "adequate landscaping and boundary treatment is provided on the southern boundary to ensure development does not have an adverse impact on the open landscape to the south."

15.8.4 It is also noted that a number of small changes are set to be made to development boundaries, which could potentially have some (usually very limited) implications for landscape:

- SITES MM22 - Development boundary for Trowse will be realigned adjacent to The Dell so it follows the boundary of the allotments.

- SITES MM26 - Development boundary for Diss will be realigned to include part of Potash Lane/Fen (but not the properties and their rear gardens to the south of the property called 'Carpe Diem').
- SITES MM33 - Development boundary for Loddon will be realigned to include a small area of a larger residential development which should logically part of the main built area of the settlement.
- SITES MM38 - Development boundary for Barford will be realigned to include two houses at the end of the cul-de-sac which are logically part of the main built area of the settlement.
- SITES MM39 - Development boundary for Bergh Apton will be realigned to exclude land that is open countryside.
- SITES MM45 - Development boundary for Yelverton will be realigned to exclude land that is open countryside.
- SITES MM48 deals with the development boundary for Langley. The decision has been taken to draw a development boundary, whereas the previous view was that this was not possible on account of flood risk and landscape considerations.

15.8.5 SITES MM52 is also notable. As a result of the proposed modification, 23 inset maps will altered to include affordable housing exception schemes already built which are adjacent to existing development boundaries. This is helpful from a landscape perspective, as it will help to ensure that DM policy with respect to affordable housing exception schemes is applied consistently within and between settlements (notwithstanding restrictions imposed through s106 agreements on exceptions sites).

15.8.6 Similarly, it is notable that a number of brief additional supporting references are set to be made, where it is the case that a settlement is adjacent or close to the Broads

Summary appraisal of the Proposed Main Modifications

15.8.7 A range of proposed modifications deal specifically with landscape and/or heritage policy, and the majority involve the addition of policy wording or the increasing of policy stringency, and hence will have positive implications. However, there are some proposed modifications that are supportive of (very small scale) development in the countryside (DM MM20 and MM29), which could lead to some risk of landscape effects. The decision to review the designation of strategic gaps is clearly 'evidence-based' and hence cannot be considered to have negative implications for landscape, and similarly the decision to remove a specific policy on 'Preserving and enhancing the historic character of Wymondham town centre' does not lead to major concerns as this would seem to be adequately covered by other policies and the NPPF (as described in paragraph 13.7.2 above).

Implications for the appraisal of the Local Plan?

15.8.8 The SA Reports published / submitted alongside the three Local Plan documents concluded that there would not be any significant effects in relation to SA objective ENV6 although the DMDP SA noted that "decisions makers should be cautious of the cumulative effect of many smaller, less serious impacts over the longer term".

15.8.9 Overall, the Proposed Plan Modifications do not change the findings of the Wymondham Area Action Plan (Wymondham AAP), the Site Specific Allocations & Policies Document (SSAPD) and the Development Management Policies Document (DMPD) with respect this SA Objective ENV1. This conclusion holds true for 'the Local Plan as modified'.

15.9 ENV7 Minimise the loss of undeveloped land and conserve and improve the quality of soil resources

Appraisal commentary

15.9.1 DM MM29 proposes a change to Policy DM 2.8 (Equestrian and other small rural land based activities) introducing a higher threshold for refusing planning permission for a change of use. The modification would raise the threshold to significant adverse effects with respect to visual appearance of the countryside and public rights of way or the areas of urban / rural transition.

Summary appraisal of the Proposed Main Modifications

15.9.2 Despite the proposed modification described above being essentially supportive of development of agricultural land, there is little reason to suggest that this will have notable implications.

Implications for the appraisal of the Local Plan?

15.9.3 The SA Reports published / submitted alongside the three Local Plan documents concluded that there would not be any significant effects in relation to SA objective ENV7. Policy DM 2.8 specifically was concluded to have no impact on SA Objective ENV7. This conclusion holds true for 'the Local Plan as modified'.

15.10 ENV8 Improve water qualities and provide for sustainable sources of supply and sustainable use

Appraisal commentary

15.10.1 DM MM58 and MM59 both relate to surface water and foul wastewater drainage for new development assessed under Policy DM4.3 (Sustainable drainage and water management). DM MM58 would introduce text advising that the sewage capacity assessment should be prepared proportionately in relation to the nature of the development. This is to provide greater flexibility to the application of the requirement for a sewage capacity assessment in recognition that an assessment may not be required for very small developments. Policy 4.3 also promotes the separation of surface water and foul wastewater, and MM59 would amend the policy to provide greater flexibility to the application of this requirement for separation included introducing a test of practicability.

15.10.2 With regards to site specific policy SITES MM44 (SEE1) involves the following additional policy requirement: *Appropriate surface water drainage attenuation to address surface water run-off from the site.*

Summary appraisal of the Proposed Main Modifications

15.10.3 Whilst the effect of the proposed modification to DM policy will be to reduce the stringency of policy requirements somewhat, there is little reason to suggest that there will be notable negative implications for water resources or the water environment.

Implications for the appraisal of the Local Plan?

15.10.4 The SA Reports published / submitted alongside the three Local Plan documents concluded that there would not be any significant effects in relation to SA objective ENV8. This conclusion holds true for 'the Local Plan as modified'.

15.11 S1 Provide everybody with the opportunity to live in a decent, suitable and affordable home

Appraisal commentary

15.11.1 The proposed modifications do not set out to change the growth strategy at Wymondham or elsewhere, and hence will not lead to significant effects in terms of housing objectives. Under WAAP MM4 all references within the Wymondham AAP to 2,200 dwellings being a 'maximum' requirement will be changed to read 'minimum'; however, this does not in itself lead to the likelihood of additional growth at Wymondham.

15.11.2 Under WAAP MM27 and SITES MM2 there is set to be a commitment to an early review of the plan. This can be considered a positive from a 'housing' perspective, as the review will take into account updated evidence of secondary school provision across the District. Currently, secondary school provision is understood (on the basis of the available evidence) to constrain the potential for housing growth to meet needs. Also, the review will take into account the emerging Strategic Housing Market Assessment that is being prepared for five Norfolk districts. Given the commitment to an early review, there can be confidence that housing need will be met over time.

15.11.3 WAAP MM11 presents some useful background text, which may aid the delivery of suitable specialist accommodation for the elderly. The text seeks to define the concept of a 'retirement care community' – which is what will be delivered through an extant planning permission – with a view to ensuring clarity on what will be delivered as a result of the WYM3 requirement to make 'care home provision'. Care home provision could include a mix of some or all of the uses proposed as part of the 'retirement care community'.

15.11.4 With regards to site specific policy:

- WAAP MM6, MM7, MM10 and MM12 deal with site specific policies WYM1 – WYM4. In each instance the effect of the Proposed Modification will be to remove reference to 'highest standards of affordability'. As a result of the change, affordable housing will be delivered in-line with JCS Policy 4 only. The reference to 'highest standards' of affordability was vague, and probably would not have led to JCS affordable housing requirements being exceeded.
- SITES MM31 involves the deletion of POR5, which was set to deliver a care home. This is necessary, as housing has now been permitted and implemented on the site. The plan does not set-out to allocate an alternative site for a care home, as care home provision in this part of the district was permitted through permission 2010/1921 for a 40 bedroom dementia unit as an extension to an existing care home in Claxton.
- SITES MM52 is notable despite not involving change to any policy. As a result of the Proposed Modification, 23 inset maps will be altered to include affordable housing exception schemes already built which are adjacent to existing development boundaries. This is helpful, as it will help to ensure that DM policy with respect to affordable housing exception schemes is applied consistently within and between settlements (notwithstanding restrictions imposed through s106 agreements on exceptions sites).

15.11.5 With regards to DM policy -

- DM MM18 and MM19 both relate to a new policy (Policy DM 1.5 Existing Commitments) which relates to the renewal of planning permissions. The new policy directs that renewals will normally be considered favourably in order to assist in delivery of the housing targets set out in the JCS. MM19 provides policy context including guidance for where renewal would be appropriate. One of the key criteria is that the renewed planning permission does not differ significantly from the original permission.
- DM MM36 proposes additional explanatory text for Policy DM 3.2 (Meeting housing requirements and needs) advising that developments should aim to provide a mix of housing to but also recognising that smaller sites may be less able to provide a mix of dwelling types.

Summary appraisal of the Proposed Main Modifications

15.11.6 Whilst the proposed modifications do not set out to support a higher growth strategy, there will now be a commitment to an early review and so there can be confidence that higher growth options will be explored in the near future. Other proposed modifications, and in particular those that relate to affordable housing, are notable but unlikely to have significant implications.

Implications for the appraisal of the Local Plan?

15.11.7 The SA Reports published / submitted alongside the three Local Plan documents concluded that there would not be any significant effects in relation to SA objective S1. Policy DM 3.2 specifically was concluded to have positive effects on SA Objective S1. This conclusion broadly holds true for 'the Local Plan as modified', although there may now be greater potential to conclude positive effects.

15.12 S2 Reduce poverty, inequality and social exclusion

Appraisal commentary

15.12.1 DM MM29 proposes a change to Policy DM 2.8 (Equestrian and other small rural land based activities) introducing a higher threshold for refusing planning permission for a change of use. The modification would raise the threshold to significant adverse effects with respect to visual appearance of the countryside and public rights of way or the areas of urban / rural transition.

15.12.2 DM MM38 proposes changes to Policy DM 3.4 (Sites for Gypsies and Travellers), generally providing for greater flexibility and hence greater potential to deliver sites for gypsies and travellers in the district, particularly if a five year supply of sites cannot be demonstrated. This modification was proposed in response an equalities impact assessment, with a view to avoiding any potential for indirect discrimination against gypsies and travellers.

Summary appraisal of the Proposed Main Modifications

15.12.3 The proposed modification to DM policy described above could lead to direct benefits; however, there is uncertainty given the need for further work on meeting Gypsy and Traveller accommodation needs. A number of other proposed modifications (discussed under other SA objective headings) that are supportive of development could potentially lead to positive implications, but there is little certainty in this respect given that existing problems are not widespread / are localised. Rural deprivation is certainly an issue in the District, and in this respect it is notable that DM MM29 will support farm diversification.

Implications for the appraisal of the Local Plan?

15.12.4 The SA Reports published / submitted alongside the three Local Plan documents concluded that there would not be any significant effects in relation to SA objective S2. Policy DM 3.4 specifically was concluded to have positive effects, while Policy DM 2.8 was assessed as having no impact. This conclusion holds true for ‘the Local Plan as modified’.

15.13 S4 Improve accessibility to essential services, facilities and the workplace, particularly for those most in need

Appraisal commentary

15.13.1 DM MM13 relates to development proposals in the countryside and provides further clarification for Policy DM 1.3 (The sustainable location of new development) on what forms of development may be permitted outside development boundaries. In particular the additional guidance provides for school related development or other community facilities such as a GP surgery or a village hall where this is a demonstrated need in rural areas. In this regard, the modification would be expects to improve accessibility to essential services in rural areas. Limited accessibility to essential service is often more acutely experienced in isolated rural communities.

15.13.2 DM MM52 proposes changes to the wording of Policy DM 3.17 (Improving the level of community facilities) to make it more effective in resisting the loss of community facilities.

15.13.3 DM MM53 and MM54 both relate to a new policy (Policy DM 3.18 – Secondary Education Capacity in the catchment of Wymondham High School Academy) that would seek to ensure that new residential development placing pressure on educational facilities (typically dwellings with more than one bedroom) would only occur where there is sufficient secondary education capacity at the Wymondham High School Academy or alternative nearby local secondary schools.

15.13.4 In a small number of instances site specific policy is set to be modified so that there are additional references to types of community infrastructure that should be delivered alongside housing development. Under WAAP MM6, MM7 and MM10, which deal with site specific policies WYM1, WYM2 and WYM3, there will now be references to 'education, library and fire hydrant provision (in addition to Bus Rapid Transit, improvements to the Thickthorn junction and Green Infrastructure enhancements) to reflect concerns raised by the County Council. Also, under WAAP MM12 (which deals with site specific policy WYM4) there will now be a requirement that: *"Site to contribute to the delivery of infrastructure and facilities in Wymondham through S106 or payment of CIL, including Library and Fire Hydrant provision."*

15.13.5 Otherwise, with regards to site specific policy, the following points are noted -

- SITES MM10 (EAS2 supporting text) – there will now be added text to ensure flexibility with regards to delivery of a gymnastics club. Text will state: *"Alternative sites that would deliver a suitable facility and meet the other objectives of EAS 1 and EAS 2 could also be acceptable within the context of an overall master plan."*
- SITES MM27 (HAR5) – there will now be added flexibility, with the policy now stating that the mixed-use element of the development may be appropriate for small-scale foodstore 'and/or' health and community facilities.
- Policy WYM14 deals with 'Relocation of Wymondham Rugby Club'. Under WAAP MM21, the policy will now state that: "The new facility must be provided prior to the loss of the existing rugby ground to ensure continuity of provision."

15.13.6 Finally, SITES MM53 is notable. It involves amending development boundaries to reflect the existence of a planning permission, which equates to making a factual update. However, the development boundary for Ashwellthorpe will not be updated to cover a site that has permission for 31 dwellings on the basis that it also offers significant community benefits (village hall, sports pitch, bowls green and village green). If this permission area was included within the development boundary, it may risk a subsequent application seeking to exclude these community benefits and deliver more houses instead.

Summary appraisal of the Proposed Main Modifications

15.13.7 There is no reason to suggest that any site specific proposed modifications, or modifications that are otherwise supportive of development, will lead to negative implications for accessibility to services / facilities.

15.13.8 It is apparent that the proposed modifications will ensure a more tailored approach to community infrastructure delivery, i.e. one that reflects existing issues/needs whilst also accounting for deliverability.

Implications for the appraisal of the Local Plan?

15.13.9 The SA Reports published / submitted alongside the three Local Plan documents concluded that there would not be any significant effects in relation to SA objective S4. Policy DM 1.3 and Policy DM 3.17 specifically were each concluded to have positive effects, and with regards to site specific policies WYM1 – WYM4 the potential for positive effects was also identified.

15.13.10 Overall, the Proposed Plan Modifications do not change the previous SA findings with respect this SA Objective S4. New Policy DM 3.18 – Secondary Education Capacity in the catchment of Wymondham High School Academy) is assessed to lead to positive effects with respect to this SA objective as it would help to ensure that residential development did not overwhelm secondary educational capacity in Wymondham.

15.14 S5 Improve the education and skills of the population overall

Appraisal commentary

15.14.1 DM MM5 would insert a new paragraph (paragraph 0.35) which would commit the South Norfolk Council to an early review of the local plan, including secondary education provision across the district.

15.14.2 DM MM53 and MM54 both relate to a new policy (Policy DM 3.18 – Secondary Education Capacity in the catchment of Wymondham High School Academy) that would seek to ensure that new residential development placing pressure on educational facilities (typically dwellings with more than one bedroom) would only occur where there is sufficient secondary education capacity at the Wymondham High School Academy or alternative nearby local secondary schools.

15.14.3 WAAP MM9 and SITES MM6 deal with sites that already have planning permission. It sets out to ensure that: *"If any of these permissions… should lapse then further applications should have regard to other policies in the Local Plan, particularly… Policy DM3.18 which refers to how future applications in the catchment of Wymondham High Academy should be considered."*

15.14.4 Also, under WAAP MM10, which deals with site specific policy WYM3, there will now be a requirement for development to contribution towards the build cost of a primary school and any necessary High School expansion.

Summary appraisal of the Proposed Main Modifications

15.14.5 The addition of a new policy through DM MM53/54 will obviously go some way to avoiding the issues that would result from development in locations where there is insufficient capacity in the local secondary school. The commitment to an early review (discussed under other SA objective headings) can also be considered a positive in this respect given that new evidence of capacity will be available.

Implications for the appraisal of the Local Plan?

15.14.6 The SA Reports published / submitted alongside the three Local Plan documents concluded that there would not be any significant effects in relation to SA objective S5. Overall, the Proposed Plan Modifications do not change the previous SA findings. New Policy DM 3.18 – Secondary Education Capacity in the catchment of Wymondham High School Academy) is assessed to lead to positive effects with respect to this SA objective as it would help to ensure that residential development did not overwhelm secondary educational capacity in Wymondham.

15.15 S6 Improve the health of the population overall

Appraisal commentary

15.15.1 WAAP MM6, MM7 and MM10 deal with site specific policies WYM1 – WYM3. In each instance the effect of the Proposed Modification will be to remove the requirement: *"Children's playspace/recreation areas must be provided in accordance with the Council's 1994 Recreational Open Space guidelines."* A less stringent requirement is set to be put in place instead: *"Children's playspace/recreation areas must be sufficient to meet the needs of residents of the development."*

15.15.2 Policy WYM12 deals with 'Protecting existing recreation or amenity land in Wymondham'. Under WAAP MM19 there will be some added stringency, in that there is an added reference to sports pitches as a specific constraint to development. The modification reflects Sport England's adopted policy 'A Sporting Future for the Playing Fields of England'.

15.15.3 Policy WYM13 – which deals with 'New recreation provision in Wymondham' – is set to be modified considerably under WAAP MM20. References to the Council's 1994 recreational open space standards have been removed, as has the specific reference to "improving, or adding to, existing areas of open space within the town." New text is proposed that will require developers to "provide much needed recreational facilities in that area of the town" and also "provide adequate outdoor play facilities and recreational open space commensurate with the level of development proposed."

15.15.4 With regards to site specific policy, SITES MM23 and MM24 (DIS2) are notable. The site is constrained, but there is now clarification that 10-15 dwellings (covering up to around 0.5 hectares) will be acceptable in order to enable the site to be released for open space, green space and an extension to the riverside walk (i.e. acceptable only in so far as it is 'enabling development').

Summary appraisal of the Proposed Main Modifications

15.15.5 There is no reason to suggest that any site specific proposed modifications, or modifications that are otherwise supportive of development, will lead to negative implications for accessibility to services / facilities.

15.15.6 A number of proposed modifications relate to delivery of open space or recreational facilities, and hence are notable from a 'health' perspective (given that some issues of deficiency do exist locally). It is noted that a less 'strategic' approach will be taken, in that policy will not require reference to be made to the Council's 1994 Recreational Open Space guidelines. It is **recommended** that the Council undertake any additional work that might be necessary to ensure that an appropriate strategic framework can be put in place in the future.

Implications for the appraisal of the Local Plan?

15.15.7 The SA Reports published / submitted alongside the three Local Plan documents concluded that there would not be any significant effects in relation to SA objective S6. The SSAPD SA Report concluded that the site allocation at Diss (including site DIS2) would have no impact. The WAAP SA Report concluded that the WAAP (including policies WYM1 – WYM4) would have a positive effect in relation to accessibility to essential services, including healthcare facilities and open spaces with the SA noting: "*The location of new development sites within easy walking distance of important core services and facilities including health facilities will help people to make informed choices about their state of health. Healthy lifestyles are a personal choice aided by the potential to walk and cycle to services and facilities and being able to gain access to recreational facilities provided as part of green infrastructure."*

15.15.8 Overall, the Proposed Plan Modifications do not change the previous SA findings with respect to SA Objective S6.

15.16 S8 Improve the quality of where people live

Appraisal commentary

15.16.1 With regards to DM policy:

- DM MM10 would amend Policy DM1.2 to strengthen the policy directive for infrastructure to be provided as part of new development by requiring that it "relate to the development, necessary to make the development acceptable and fairly and reasonably related in scale and kind". This change also aligns the policy with the NPPF.
- DM MM34 and MM35 both relate to the deletion of Policy DM3.1 (and supporting text). This proposed policy related to internal residential space standards which will shortly become part of the Building Regulations. Once changes to these regulations come into force it will be outside planning policy to secure internal residential space standards.
- DM MM45 clarifies that masterplans will be required for all major development of less than 500 dwellings where they meet the definition within Policy DM3.9 (particularly complex development).
  - DM MM45 also adds a new criterion to Policy DM3.9, establishing that dwellings should be designed so that internal spaces are suitable and adaptable and will be able to accommodate a rage of residents over time.
- DM MM50 would amend the supporting text to Policy DM 3.16 (Outdoor play facilities and recreational space) provide further emphasis on the importance of open space in the context of sustainable development. DM MM51 would amend the wording of the policy itself to replace a reference to supplementary planning guidance a more flexible requirement for provide open space "commensurate with the level of development proposed in order to meet the needs of occupants".

15.16.2 A number of small additions are made to site specific policies with a view to addressing specific concerns relating to environmental quality / amenity. Notably –

- WAAP MM13 (WYM6) - two additional criteria are proposed. The first seeks to require a buffer zone/additional planting (to be negotiated with South Norfolk Council) screens the development from nearby properties. The second states that a condition will be imposed on hours of operation to protect the residential amenity of nearby properties.
- SITES MM15 and MM16 (HET1 and HET2) – there will now be a requirement that the sites are masterplanned together, given latest understanding of the best location for an access point (given a local narrow road).
- SITES MM30 (Policy POR3) – there will now be a requirement to ensure that as part of development (for B1 uses) provision is made for 'an appropriate landscape buffer to reduce noise impacts on neighbours'.

Summary appraisal of the Proposed Main Modifications

15.16.3 There is no reason to suggest that any site specific proposed modifications, or modifications that are otherwise supportive of development, will lead to negative implications for 'the quality of where people live'.

15.16.4 It is clear that the opportunity has been taken, through the proposed modifications, to respond to a number of specific issues that have been raised with regards to residential amenity etc.

Implications for the appraisal of the Local Plan?

15.16.5 The SA Reports published / submitted alongside the three Local Plan documents concluded that there would not be any significant effects in relation to SA objective S8, although the DMPD SA Report concluded the positive effects were likely from policy DM 1.2, DM 3.1 and DM 3.16 with respect to this SA objective. This conclusion holds true for 'the Local Plan as modified'.

15.17 EC1 Encourage sustained economic growth

Appraisal commentary

15.17.1 Under WAAP MM27 and SITES MM2 there is set to be a commitment to an early review of the plan. This can be considered a positive from an economic growth perspective, as the review will take into account updated evidence of secondary school provision across the District. Currently, secondary school provision is understood (on the basis of the available evidence) to constrain growth aspirations. Also, the review will take into account the emerging Strategic Housing Market Assessment that is being prepared for five Norfolk districts. Given the commitment to an early review, there can be confidence that housing need will be met over time, and hence there will be sufficient local workforce to support economic growth objectives.

15.17.2 With regards to DM policy:

- DM MM20 removes the requirement for a sequential test from Policy DM 2.1 (Employment and business development) for small scale rural offices or other small scale rural development. While this relaxes planning controls on development outside existing settlement boundaries this only applies to small scale development and would not therefore be likely to have an adverse effect on the economic viability of existing town centres.
- DM MM23 clarifies that for the purposes of Policy DM 2.4 (Location of the 'main town centre uses') the retail hierarchy does not include defined centres.
- DM MM24 would add additional supporting text to Policy DM 2.5 (Changes of use in centres) to clarify how proposals for new neighbourhood centres containing shops and services will be considered. The modification adds a reference to further detail being given in the Site Specific Allocations and Policies Document where this is appropriate.
- DM MM31 and MM32 both relate to the wording and supporting text to Policy 2.11 (Agricultural and other occupational dwellings in the countryside). The modifications would introduce a requirement on applicants to demonstrate a functional linking between the farm enterprise and any new dwellings as well as demonstrating the long-term financial viability of the farming enterprise.

15.17.3 With regards to site specific policy SITES MM12 (COS3) adds detail on the types of use that are inappropriate at Longwater (which is not a town centre), specifying 'further car showrooms and petrol filling stations'. This should help to ensure the functioning and vitality of town centres elsewhere across the district in the long term. Also within Costessey, SITES MM13 will ensure greater potential for redevelopment of existing uses within the development boundary, given the added specification that there is potential for redevelopment where it can be demonstrated that the area is already adequately served for the type of use to be lost.

Summary appraisal of the Proposed Main Modifications

15.17.4 The proposed modifications do not have major implications for the achievement of strategic (e.g. sub-regional) economic objectives, with the commitment to an early Plan Review perhaps being of greatest note. Other proposed modifications set out to address more local issues / opportunities that have come to light. It is also worth noting that there is no reason to suggest that the cumulative effect of Proposed Main Modifications will be to increase the stringency of policy requirements (e.g. in relation to environmental protection) so that development will be discouraged.

Implications for the appraisal of the Local Plan?

15.17.5 The SA Reports published / submitted alongside the three Local Plan documents concluded that there would not be any significant effects in relation to SA objective EC1, although the DMPD SA Report concluded the positive effects were likely from policy DM 2.1, DM 2.4, DM 2.5 and DM 2.11; and the SSAPD SA concluded the positive effects were likely from the allocation of sites at Costessey (including site COS3). This conclusion holds true for 'the Local Plan as modified'.

15.18 Conclusions at this current stage

15.18.1 The predicted effects of the Proposed Main Modifications are notably positive in terms of a number of SA objectives, and whilst negative effects are predicted in terms of biodiversity, effects will in all likelihood be minor.

15.18.2 The appraisal presented under the 'landscape and heritage' objective (Maintain and enhance the distinctiveness and quality of landscapes, townscapes and the historic environment) is notable as the potential for both positive and negative effects is highlighted, and there is the potential for significant effects (given local sensitivities).

15.18.3 In terms of socio-economic objectives, whilst the proposed modifications do not set out to support a higher growth strategy, there will now be a commitment to an **early review** and so there can be confidence that higher growth options will be explored in the near future. A higher growth strategy could potentially support the achievement of housing need and economic growth related objectives. Also with regards to socio-economic objectives, it is noted that the policy approach to addressing two key issues – access to secondary school education, and growth/diversification in the rural area – is set to be strengthened.

15.18.4 The Council and Inspector should take these appraisal findings on-board when finalising the plan, but at this stage no formal **recommendations** (for changes to the Proposed Main Modifications) are made.

15.18.5 The following recommendations, which have come out of the appraisal, relate to plan-making work subsequent to adopting the three Local Plan Documents / when moving forward with the Plan Review:

- Planning for green infrastructure at Wymondham should be a particular focus of monitoring efforts.
- The Council should not 'lose momentum' with regards to implementing a locally specific approach to carbon compliance, and to this end should undertake work to establish precisely what can be achieved through local policy (given the national policy framework). The aim should be to ensure that a suitably proactive approach can be implemented through the forthcoming Plan Review.
- With regards to planning for open space, the Council should also undertake any additional work that might be necessary to ensure that an appropriate strategic framework can be put in place in the future.

PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

17 INTRODUCTION

17.1.1 The aim of this part of the report is to explain the steps that will be taken up to the point where the three Local Plan documents are adopted, and also to present 'measures envisaged concerning monitoring'.

18 PLAN FINALISATION

18.1.1 Subsequent to the current consultation, it is anticipated the Inspector will be in a position to prepare his report on the 'soundness' of the three Local Plan documents.

18.1.2 Once found to be 'sound' the Council will be in a position to adopt the three Local Plan documents.

19 MONITORING

19.1.1 At the time of Adoption a 'Statement' will be published that sets out (amongst other things) *'the measures decided concerning monitoring'*. At the current stage there is a need to present *'a description of the measures envisaged concerning monitoring'* only.

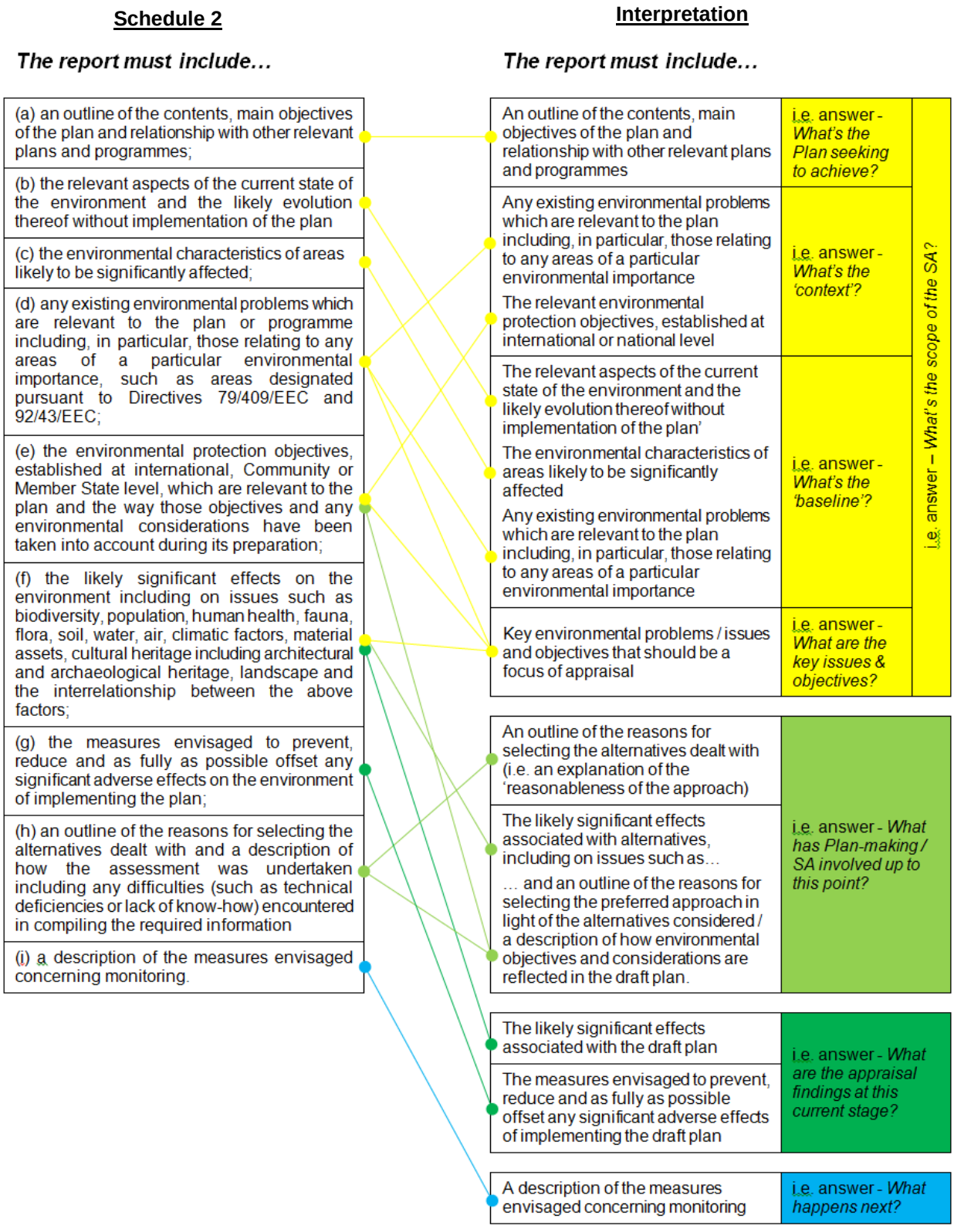
19.1.2 The three district councils that form the Greater Norwich area produce a single combined Annual Monitoring Report each year, and as such it is envisaged that the effects of the Wymondham AAP will be monitored using this established monitoring framework.

19.1.3 Within the SA Reports as published / submitted a recommendation was made in relation to monitoring, which remains current. Specifically, it was suggested that there is a need to focus on *"use of public transport as well as walking and cycling as a means to access services, facilities and employment and to monitor the impacts on landscape, townscape and historic character associated with growth*."

19.1.4 Furthermore, in light of the appraisal of Proposed Main Modifications presented in this SA Report Addendum (see Part 3, above) it is recommended that 'planning for green infrastructure at Wymondham' should be a particular focus of monitoring efforts.

APPENDIX 1: REGULATORY REQUIREMENTS

Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. The table below interprets Schedule 2 requirements.



APPENDIX 2: SITE OPTIONS APPRAISAL UPDATE

Chapter 10 explains how, prior to establishing alternatives, consideration was given to the merits of site options in isolation. Specifically, Chapter 10 explains how it was possible to draw upon the findings of site options appraisal work undertaken prior to submission and also appraisal site options appraisal work undertaken post-submission.

The aim of this Appendix is to present site options appraisal work that has been completed post submission, as this information has not been formally published for consultation in the past.

The Rosemary Mason Site

Rosemary Mason site – this is a small site adjacent to the WYM 3 allocation to the south of Wymondham. It was not subjected to SA prior to submission.

The outcome of the appraisal at this stage can be seen in Table 2A. The conclusion is that the site is rejected, i.e. need not feed into consideration of alternatives.

Table 2A: Appraisal of the Rosemary Mason site option

Criteria			Existing Land Use Policy										Landscape/ Townscape/ Historic Environment							Ecology/Biodiversity										Other Material Considerations									
	Conforms with JCS settlement hierarchy?	Settlement Boundary	Existing Land Use Allocation	Primary Shopping Area	Central business area	Area of Open Land ENV2	River Valley ENV3	Southern Bypass Landscape Protection Zone ENV6	Protection Important Spaces (IMP3)	Protected Rail Route	Brownfield/Greenfield	Agricultural Land Grade 1, 2	Historic Park/Garden	Listed Building	Conservation Area	Scheduled Ancient Monument	Site Archaeological Interest (HER)	Existing Use	Tree Preservation Order	Ancient Woodland	Protected Hedgerow	SSSI/Ramsar	County Wildlife Site	SAC/SPA	Site contamination/pollution	Flood Risk	Hazardous Zone	Public Transport Access issues	Service Availability (UTITLIES)	Local Access to Services	Site Availability	Gas Pipeline	Oil Pipeline	Sites on a Minerals Resource	Mineral/Waste Safeguarding site	Sewage treatment works safeguarding	Article 4 Direction	NCC Transport View	Preferred options consultation
Performance (on a green / amber / red' scale)																																					
Conclusion	SITE REJECTED principally due to the lack of accessibility to services, no core services within 800 metres. The 2,200 dwelling 'ceiling' has already been met on sites with planning permission and therefore this site is not considered necessary for allocation. The site does not form part of the South Wymondham allocation (which now has planning permission) and in the Council's opinion even if it did form part of that allocation much of the site would need to be given over to landscaping to provide a buffer to the sensitive Silfield Newt Reserve, the Lizard and to protect residential amenity from building right up to the boundary with the A11 trunk road. There would be difficulty in providing vehicular access to the site. Right Up Lane is currently a narrow road that has been terminated by the building of A11 Wymondham bypass. It is proposed to prohibit vehicular access to the lower part of Right Up Lane as part of the South Wymondham planning permissions and this would mean that vehicular access to the site would need to through the WYM 3 allocation and there is no evidence of any such agreement with the developer of that site.																																						

Land at NE Wymondham

This large site option was the focus of detailed appraisal prior to submission, with appraisal findings published in the SA Report published / submitted; however, post submission it was recognised that there was a need to revise appraisal findings to reflect changes that had been made to the boundary of the site.

The outcome of the appraisal at this stage can be seen in Table 2B. No individual site criteria scored 'red', and hence at least part (or parts) of the site could feed into consideration of alternatives. However, the overall conclusion of the site appraisal is that the site as submitted is not appropriate to allocate because of potential impact on the Strategic Gap, highways impacts and because the 2,200 "ceiling" at Wymondham has been exceeded through other permissions.

Table 2B: Appraisal of the Land at NE Wymondham site option

Criteria			Existing Land Use Policy										Landscape/ Townscape/ Historic Environment						Ecology/Biodiversity											Other Material Considerations									
	Conforms with JCS settlement hierarchy?	Settlement Boundary	Existing Land Use Allocation	Primary Shopping Area	Central business area	Area of Open Land ENV2	River Valley ENV3	Southern Bypass Landscape Protection Zone ENV6	Protection Important Spaces (IMP3)	Protected Rail Route	Brownfield/Greenfield	Agricultural Land Grade 1, 2	Historic Park/Garden	Listed Building	Conservation Area	Scheduled Ancient Monument	Site Archaeological Interest (HER)	Existing Use	Tree Preservation Order	Ancient Woodland	Protected Hedgerow	SSSI/Ramsar	County Wildlife Site	SAC/SPA	Site contamination/pollution	Flood Risk	Hazardous Zone	Public Transport Access issues	Service Availability (UTITLIES)	Local Access to Services	Site Availability	Gas Pipeline	Oil Pipeline	Sites on a Minerals Resource	Mineral/Waste Safeguarding site	Sewage treatment works safeguarding	Article 4 Direction	NCC Transport View	Preferred options consultation
Performance (on a green / amber / red' scale)																																						
Conclusion	Parts of the site are in the Strategic Gap. NCC Minerals safeguarding provisions will apply. NCC Environment - significant landscape issues due to scale of development, particularly need for green buffer between areas of development and setting of Listed Building. Developer support through consultation. NCC Highways - large site, different comments apply to different parts - comments range from 'well located' to 'remote from settlement', wouldn't object to areas closest to existing boundary. Public comment - harmful to landscape character, urban sprawl, too large. Issues with WWTW and foul sewerage network capacity. Amended site boundary (smaller site) put forward at Preferred Options stage and then further amended at Pre-Submission. The 2,200 dwelling 'ceiling' has already been met on sites with planning permission and this site is not considered necessary or appropriate for allocation due partly to this, and partly due to harm to the strategic gap. The overall conclusion on the suitability of the (smaller) site is no different to the larger site. Permitted parts of the larger site (Norwich Common and Carpenter's Barn), which are excluded from the smaller site boundary, are counted towards the 2,200 dwelling requirement. The wider area as a whole was considered as a growth option through the SA process and was rejected in favour of large scale growth to the south of the town and this view has not changed																																						

Land at London Road/Suton Lane (Gonville Hall)

This site option was the focus of detailed appraisal prior to submission, with appraisal findings published in the SA Report published / submitted; however, post submission it was recognised that there was a need to revise appraisal findings to reflect changes that had been made to the boundary of the site.

The outcome of the appraisal at this stage can be seen in Table 2C. No individual site criteria scored 'red', and hence at least part (or parts) of the site could feed into consideration of alternatives. However, the overall conclusion of the site appraisal is that the site as submitted is not appropriate to allocate because of potential impact on the setting of Gonville Hall, Wymondham Abbey and the historic core of the town, and because the 2,200 "ceiling" at Wymondham has been exceeded through other permissions.

Table 2C: Appraisal of the Land at London Road/Suton Lane (Gonville Hall) site option

Criteria			Existing Land Use Policy										Landscape/ Townscape/ Historic Environment						Ecology/Biodiversity															Other Material Considerations									
	Conforms with JCS settlement hierarchy?	Settlement Boundary	Existing Land Use Allocation	Primary Shopping Area	Central business area	Area of Open Land ENV2	River Valley ENV3	Southern Bypass Landscape Protection Zone ENV6	Protection Important Spaces (IMP3)	Protected Rail Route	Brownfield/Greenfield	Agricultural Land Grade 1, 2	Historic Park/Garden	Listed Building	Conservation Area	Scheduled Ancient Monument	Site Archaeological Interest (HER)	Existing Use	Tree Preservation Order	Ancient Woodland	Protected Hedgerow	SSSI/Ramsar	County Wildlife Site	SAC/SPA	Site contamination/pollution	Flood Risk	Hazardous Zone	Public Transport Access issues	Service Availability (UTITLIES)	Local Access to Services	Site Availability	Gas Pipeline	Oil Pipeline	Sites on a Minerals Resource	Mineral/Waste Safeguarding site	Sewage treatment works safeguarding	Article 4 Direction	NCC Transport View	Preferred options consultation
Performance (on a green / amber / red' scale)																																								
Conclusion	The main issue relates to the impact on the setting of Gonville Hall. Water main crossing site would require mitigation by protected easement/diversion. Foul sewerage network capacity issues. Flood Zones 2 and 3 close by. English Heritage - if taken forward should be subject to archaeological evaluation. NCC Highways - reasonably well located - potential to be close to BRT, subject to suitable access would not object. CPRE - no development within 400m of Gonville Hall. Support from developer, amended site boundary (smaller site) put forward at Preferred Options stage, including proposals for primary school and cemetery. The 2,200 dwelling 'ceiling' has already been met on sites with planning permission and therefore this site is not considered necessary for allocation. The overall conclusion on the suitability of the (smaller) site is no different to the larger site as although the Listed Building criteria would change from red to amber to indicate that Gonville Hall is no longer part of the site being suggested for development, the potential impact on the setting of Gonville Hall and the historic landscape setting of the town and Abbey is still considered to a significant factor weighing against its allocation																																									

APPENDIX 3: BROAD APPROACH AT WYMONDHAM

This appendix presents detailed appraisal findings in relation to the alternatives dealing with 'broad approach to growth at Wymondham'. The alternatives are introduced in Chapter 11, above.

Objective	Discussion	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
ENV1 Maintain and enhance biodiversity, geodiversity, species and habitat quality, and avoid habitat fragmentation	Wymondham is surrounded by river valleys and woodland as well as a high number of environmentally sensitive areas such as County Wildlife Sites. Policy 10 of the JCS requires the provision of extensive levels of green infrastructure around Wymondham to create a "Kett's Country" pastoral landscape of grassland, woodland, hedgerow and wetland habitat. What this means in practice is not tightly defined; however, in-light of consultation with local interest groups it has become clear that there is a need to take a landscape-scale approach to nature conservation whereby features are considered not only in isolation, but also as part of a connected and functioning network. In-line with this aspiration, work has been undertaken to establish a Wymondham '**Green Infrastructure Map**'. The GI map clearly identifies the valley of the River Tiffey as a priority area for conservation, a fact that does not have a major bearing on the alternatives under consideration here. Sites under consideration to the north are well away from the river valley, whilst sites to the south-west are on land above the river valley. Having said this, it is possible to conclude that the option of **growth to south-west** performs less well in terms of strategic biodiversity conservation objectives given relative proximity, and particularly given the potential for surface water to drain into one of two tributaries of the Tiffey (Dyke Beck, which is identified as forming part of the Tiffey Valley sub-regional GI corridor; or Bays River, which includes an extensive area designated as a County Wildlife Site). It is also worth considering the potential for development to the south-west to impact on the Tiffey river corridor cumulatively, in-combination with the permitted 'South of Wymondham' scheme, which sits adjacent to a sensitive part of the river corridor (the Lizard County Wildlife site; albeit numerous mitigation measures are a condition of the planning permission). Whilst the **north of Wymondham** seems less constrained, there are some features of interest that could come under pressure. The southern boundary contains Neighbourhood Green Infrastructure Corridor N4 and the eastern half of the area under consideration includes several small woodland patches / tree belts and a network of hedgerows, some of	**1**	**2**	**4**	**3**

Objective	Discussion	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
	which have been identified as contributing to GI locally, and one being seemingly (from an aerial view) being substantial with an associated drainage ditch / stream. The area is unlikely to be highly sensitive though, and in fact there may be the potential to enhance or create woodland or wetland habitats as part of a development scheme, and hence contribute to ecological connectivity to the north of Wymondham. It is noted that a distinct green infrastructure corridor will run through the centre of the large permitted scheme at South Wymondham, and so perhaps this could set a precedent for growth to the north (albeit it is recognised that the approach taken to the south-east reflects a particular circumstance, namely the need to accommodate the river corridor). Such a GI corridor could potentially be run north to south between the scheme and the Norwich Common / Carpenters Barn schemes to the east; strengthening GI corridor N4. **In conclusion**, 'nil additional growth' is the preferable option. Whilst it might be suggested that there is the potential to design-in GI as part of a development scheme (in such a way that the ecological role of this land is enhanced), there can be no certainty in this respect. When distinguishing between the other options, a key consideration is probably the desire to conserve / enhance the functioning of the Tiffey Valley. Growth to the south-west performs worse in this respect, although it is not possible to conclude the potential for significant negative effects, given uncertainty on the potential to impact on river corridor functioning.				
ENV2 Limit or reduce vulnerability to climate change, including minimising the risks from flooding	Flood risk is the key consideration here – i.e. under this objective - however, it is not clear that flood risk is a major consideration, given the alternatives at hand. There are not thought to be any significant areas of flood risk that would hinder development at any of the locations under consideration. It should be the case that any areas that do intersect can be left undeveloped. The potential for development to lead to increased surface-water runoff and therefore increased flood risk down-stream is a consideration with regards to development in the south-west, given the proximity of sites to either the River Tiffey or one of its tributaries; however, there is little reason to suggest that negative effects would arise. **In conclusion**, 'nil additional growth' is the preferable option, although it is probably fair to say that, properly controlled/mitigated, none of the options would likely have a significant	☆ 1	**2**	**2**	**2**

Objective	Discussion	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
	adverse negative impact on flood risk. On balance it is not appropriate to distinguish between the other options, given uncertainties.				
ENV3 Maximise the use of renewable energy solutions and reduce contributions to climate change	Large development schemes give rise to economies of scale, and hence the potential to design-in renewable or low carbon energy solutions. As such, it is possible to conclude that the option of focusing growth to the north performs well. It might also be that bringing forward significant growth to the north enables the scheme to be masterplanned alongside the Norwich Common / Carpenters Barn schemes, leading to further opportunities; however, in practice this seems unlikely given that these schemes are permitted and Norwich Common is largely built out. Growth to the south-west would be spread across several sites (promoted by different parties), therefore reducing the likelihood of economies of scale being realised that lead to opportunities to design-in ambitious energy solutions. In **conclusion**, a decision to deliver a major scheme could lead to significant positive effects, in terms of per capita **built environment related carbon emissions**. The other options would not lead to such opportunities in that they would lead to small schemes (or a large scheme delivered incrementally, if we accept that a small scheme to the north could become a large scheme over time). Significant negative effects are, however, unlikely given the range of other factors that will come into play. N.B. Carbon emissions from transport are also an important climate change mitigation consideration, and are considered below (under ENV4).	**2**	**1**	**2**	**2**
ENV4 Reduce the effect of traffic on the environment	A key consideration here is the need to reduce car dependency (i.e. the frequency of car use and the need to travel longer distances by car) amongst local residents, and hence per capita **transport-related carbon emissions**. Traffic can also impact the environment in other ways (e.g. congestion can impact on air quality), as discussed separately under ENV5. There may be the potential for a larger scheme to fund or stimulate transport improvements (e.g. an enhanced bus service, or new cycle routes); however, an over-riding factor is the location of development in relation to the town centre, train station and likely BRT route. Policy 10 of the JCS states that houses should be built in Wymondham up to 2026, *located on a number of sites around the town to provide easy access to local jobs, services and facilities and the town centre.*	**2**	**2**	**2**	**1**

Objective	Discussion	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
	In light of these considerations, **North of Wymondham** is not an ideal location for housing growth. The town centre and train station are distant, and only a proportion of new houses (those located closest to the B1172) would have good access to the BRT route. Having said this, there is a business park and supermarket nearby, and there is also longer distance cycle access to Hethersett and Norwich Research Park (which has the potential to be enhanced). It is also the case that there are some shops and facilities in the north of Wymondham (local shops, pub and community centre on Lime Tree Avenue; and Ashleigh Infant School on Sheffield Road), and it would be possible to deliver a primary school (and possibly an associated small local centre) as part of a large scheme. With regards to **the south-west**, one of the sites under consideration is well located – with good walking access to the train station and town centre – whilst two of the sites are poorly located (although it is fair to assume that there will be a good bus service into town; and it may be that the BRT route passes this site, i.e. if the decision is made to extend the BRT to Attleborough). An important additional factor is the potential for the 'additional growth' options to lead to high school transport implications. It is generally accepted that Wymondham High School cannot expand any further beyond that to accommodate approximately 2,200 new dwellings due to it being land-locked. Any children arising from additional houses would therefore likely be accommodated at another, more distant, high school (Hethersett, Attleborough or possibly even further afield). Although some could perhaps cycle, and there would be good bus services, notable private car use would also result. In **conclusion** – • It can be argued that additional growth at Wymondham could help to achieve a reduction in per capita transport-related carbon emissions, given that Wymondham has a mainline railway station providing easy and direct access to Norwich and Cambridge (and which has the potential to be enhanced as a public transport interchange), and also given the anticipated BRT route and a focus locally on enhanced cycling routes. • However, a notable complicating factor relates to car dependency (and likely additional bus movements) that would result from additional children needing to be schooled away				

Objective	Discussion	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
	from Wymondham. On balance, it is probably appropriate to conclude that the 'additional growth' options perform better than the option of nil growth; however, there is major uncertainty given an absence of detailed investigation (through 'modelling'). When differentiating between these options, a key consideration is the need to support modal shift by locating development in close proximity to the BRT route in the north, and to the town centre / train station in the south. As such, the option of 'splitting' growth is performs best, although there are some risks given the potential for a smaller scheme to the north growing (i.e. extending away from the existing built-up area) over time unhindered by hard boundary features. It can be suggested that the option growth to the north is preferable to the option of growth to the south-west given that it would be easier for students to access a secondary school outside of Wymondham (at Hethersett); however, this is not thought to be a major consideration.				
ENV5 Improve air quality and minimise noise, vibration and light pollution	There are not thought to be any major air / environmental quality issues at present; however, under a growth scenario the potential for increased congestion at some junctions can be anticipated, potentially leading to air quality / environmental quality implications. A Highways Agency study has examined the implications of growth at Wymondham on the A11 corridor, looking both at the A11 junctions and also two nearby roundabouts within Wymondham (at Waitrose and the Police Headquarters). Whilst the study found no likelihood of a detrimental impact on the operation of the A11, and the potential for more local capacity issues to be addressed through junction upgrades, the study did not seek to explore the implications of higher growth scenarios. Additional growth could lead to increased congestion on the A11 (and in particular the Thickthorn junction with the A47, which is near capacity and in need of a costly upgrade); and there is certainly a strong possibility that growth focused north of Wymondham would lead to problems at nearby roundabouts, including where 'sensitive receptors' could be affected (including homes). In the south west, there are some particular issues around the capacity of local rural lanes, and there is a notable issue around highways / access at the site close to the railway station; however, it is not clear that there is a risk of issues around air quality / environmental quality.	1	**4**	**2**	**3**

Objective	Discussion	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
	In **conclusion**, it is appropriate to conclude that 'nil additional growth' performs best. 'Significant growth to the north' performs least well, although it is not possible to conclude significant negative effects given the potential for infrastructure upgrades. The option of 'splitting' growth also performs relatively poorly, given the possibility of a small scheme to the north becoming a large scheme over time.				
ENV6 Maintain and enhance the distinctiveness and quality of landscapes, townscapes and the historic environment	Policy 10 of the JCS states that new houses should be built in Wymondham whilst maintaining the strategic gap to the north and north east and the historic setting of the town and abbey, whilst also referencing the need to maintain a "Kett's Country" pastoral landscape of grassland, woodland, hedgerow and wetland habitat. With regards to the Abbey, sites to the south-west are in relative proximity, but there is limited potential to impact on its setting (i.e. views towards it) given the potential to avoid/mitigate effects through masterplanning and landscaping. There has to be some uncertainty, however, as any erosion of the open agrarian landscape to the south-west of Wymondham might be considered to have an effect on the Abbey's setting. To the north of the town, it is assumed that no scheme would breach the designated strategic gap between Wymondham and Hethersett. Designations aside, the gap between the towns would be affected to some extent, but the effect can be considered minor given the permitted Norwich Common / Carpenters Barn schemes. In terms of less strategic considerations, there is a need to consider the role of Wymondham as a historic market town in a rural setting. One of the three sites to **the south-west** (i.e. that located away from the town centre, and to the south of the B1172) stands-out as having the potential to impact on the rural setting of the town in that development would impact on the approach to the town along the B1172. As things stand, motorists have relatively open views, and are only c.1.5km from the historic town centre (albeit they will first pass a small residential area and an industrial area). The site is also in close proximity to Gonville Hall (a Grade II listed building). It is possible that impacts on its setting could be avoided/mitigated, particularly if a small scheme were to come forward on the site; however, there is some uncertainty. There is a need to consider the importance that must be attributed to the current setting of the Hall within an open agrarian landscape.	☆ 1	3	3	2

Objective	Discussion	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
	To **the north**, aside from the issue of the strategic gap, there is a need to consider the fact that Tuttles Lane currently provides a clear ('hard') boundary between the countryside and the built-up area, and that views into and out of the countryside will be appreciated by local residents and others, albeit those experiencing the landscape will not feel that they are experiencing 'an historic market town in a rural setting' given that North Wymondham comprises 20th century development. The Wymondham Conservation Area Character Appraisal and Management Plan does not explore the role of this part of the town in detail, but does state that: *"From the north, the gently rolling countryside rises up to Tuttles Lane with the town hidden behind. The relatively unspoilt panoramic views from Tuttles Lane are of interest."* There are also several listed buildings associated with farms to the north of Wymondham, although even under a large scheme development would be distant (almost 1km to the nearest farm), hence not impacting directly on their setting. Finally, there is a need to consider whether development would impact on the approach to Wymondham along the B1172 from Hethersett, but this is not likely given other new and planned schemes. In **conclusion**, 'nil additional growth' is the preferable option, given the sensitivities that exist, and it is possible to conclude that major growth in either direction would likely lead to significant negative effects. Smaller scale growth to the north or south would likely avoid significant negative effects, but it is noted that any breach of Tuttles Lane to the north would increase the likelihood of development extending further into open countryside over time (bearing in mind the scale of the land put forward here).				
ENV7 Minimise the loss of undeveloped land and conserve and improve the quality of soil resources	All growth options would lead to the loss of productive agricultural land, although there is a small area of previously developed land to the north of Wymondham (the nursery site), which adjoins the existing built up area and hence would be developed under any scheme. The rugby club site would also be delivered under any scheme to the north of Wymondham, and whilst this is 'greenfield' land it is not currently in agricultural use. In **conclusion**, it is appropriate to conclude that the 'nil additional growth' option performs best (given no assumption that this option would lead to greater pressure for development of productive agricultural land elsewhere). The option of focusing growth solely to the south-west performs worst, and would lead to significant negative effects, as all land developed would be productive agricultural land.	1	2	4	2

Objective	Discussion	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
ENV8 Improve water qualities and provide for sustainable sources of supply and sustainable use	It is not thought that the decision on a spatial strategy for Wymondham will lead to significant implications in terms of this objective. The East of England is a water stressed area, but it can't be assumed that the decision to not focus additional growth at Wymondham through this Local Plan will lead to lower growth at the regional scale. There are no indications that wastewater capacity is a significant constraint to development in Wymondham, with Anglian Water confident that the plan as submitted will not lead to breaches of capacity at wastewater treatment works. With regards to foul sewerage and surface water network capacity, the conclusion of the water company is that, whilst infrastructure and/or treatment upgrades will be required, there are no major constraints (i.e. constraints that cannot be overcome given funds). South Norfolk has had a series of meetings with Anglian Water and agreed a position statement: *"All development in South Norfolk should have a drainage strategy that includes a sewerage capacity assessment, and will need to obtain approval for the surface water drainage system from the SUDS approval body once they are in place. No new surface water connections should be made to combined and foul sewers, and where possible existing connections to combined and foul sewers should be removed."* Under ENV1, above, the potential for additional growth to the south-west to result in some surface water runoff to affect the water environment does have a bearing on the appraisal; however, under this objective it is suggested that growth to the south-west would not lead to notable implications. Whilst there could be some localised impacts on the water environment / wetland areas, it is not thought that there would be a notable impact on water quality at the 'watercourse' scale.	N/a	N/a	N/a	N/a
ENV9 Minimise the production of waste and increase recycling	Norfolk County Council has a Recycling Centre in Wymondham operating on a part time basis. County Council officers are looking into the provision in Wymondham and the surrounding areas, taking into account the difficulties with the existing site and the predicted housing growth in the Wymondham area, however at this time there are no plans for a replacement or new site. The option of expanding the existing site has been mooted; , however, Norfolk County Council (the waste planning authority) has virtually dismissed the option of expansion given a number of constraints, not least the presence of a County Wildlife site.	☆ **1**	**2**	**2**	**2**

Objective	Discussion	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
	In **conclusion**, given identified capacity constraints, it is appropriate to conclude that the 'nil additional growth' option is preferable, although there is little reason to suggest that additional growth would lead to significant negative effects on recycling levels (given kerbside recycling) or fly tipping. If there is additional growth, then the location is unlikely to have a bearing on waste management objectives, although growth to the south-west might be preferable given proximity to the existing household waste recycling centre (notwithstanding capacity issues).				
S1 Provide everybody with the opportunity to live in a decent, suitable and affordable home	Additional housing growth in Wymondham could help to address housing need issues locally, although there is little in the way of clear evidence to indicate levels of housing need specific to Wymondham. What is understood is that housing need across the Norwich sub-region led to JCS Policy 4 setting an affordable housing target of 33%, and that this target will not be met by the forthcoming South of Wymondham scheme, which will achieve only 15% on the basis of viability considerations (given the need for enabling investment in infrastructure, although there is a 'clawback' provision should land values rise). It has also been suggested that the baseline situation of relying on growth to the south of Wymondham to deliver on housing need objectives is less than ideal given the potential for the scheme to experience delays; however, this cannot be assumed to a major concern, given that the scheme now has planning permission. It may be the case that the sites under consideration to the north and south-west are relatively unconstrained in terms of infrastructure, and hence would be able to come forward quite quickly and viably deliver on the 33% target; however, there is little certainty in this respect. It is certainly the case that further investigation into any scheme to the north of Wymondham could identify a need for upgrades to major junctions, and one of the three sites to the south-west is also somewhat constrained in terms of access.	**2**	☆ **1**	☆ **1**	☆ **1**
S2 Reduce poverty, inequality and social exclusion	Housing growth can support regeneration / help to address relative deprivation (through supporting jobs growth and enabling targeted investment in community infrastructure); however, it is not thought that there are particular issues / opportunities in Wymondham. There might be some issues of social exclusion locally, in particular amongst the elderly and disabled, associated with access to services / facilities; however, such issues are considered below under S4. 'Rural deprivation' is another issue, and one that	N/a	N/a	N/a	N/a

Objective	Discussion	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
	does arise to some extent in South Norfolk; however, it is not thought that the scale of additional growth under consideration at Wymondham would have a bearing, i.e. it would not lead to transformative change to Wymondham Town Centre.				
S3 Offer opportunities for all sections of the population to have rewarding and satisfying employment	Additional housing growth at Wymondham is unlikely to stimulate new employment development within the town, although there are significant existing employment growth areas nearby (notably Hethel and Norwich Research Park), which enables the conclusion to be drawn that additional growth in Wymondham is a positive from a 'sustainable economic growth' perspective. This matter is considered further below, under the 'EC' objectives. The discussion here, under this objective, should focus more on the potential to avoid / address issues about certain groups within the community being excluded from employment opportunities, e.g. because of skills or education. In this respect, the alternatives under consideration do not lead to notable implications.	N/a	N/a	N/a	N/a
S4 Improve accessibility to essential services, facilities and the workplace, particularly for those most in need	A foremost consideration relates to whether or not growth locations will enable new residents to access existing services/facilities, many of which will be located in the town centre. Issues in this respect have already been discussed above, to some extent, under ENV4. Also, there is a need to consider the potential for growth to put pressure on existing capacity of services/facilities, potentially to the detriment of the existing community. However, concerns must be tempered by the fact that growth will fund the delivery of new services/facilities to some extent. Additional provision will often be only that which is necessary to serve the new community, but in some instances it will be possible to fund targeted enhancements so that the existing community benefits. The current situation in Wymondham is that the town centre is functioning well, and there are no headline capacity issues in terms of services/facilities (with the notable exception of secondary education, as discussed below under S5); however, it is important to note that issues could arise in the future given the scale of growth 'in the pipeline'. A large scheme to **the north** would likely deliver a primary school and possibly an associated small local centre, but at a maximum of 800 homes the scheme would not achieve a similar level of self-containment to the larger South Wymondham scheme (1200 houses). Importantly, there are also draw-backs in that the centre-point of a large scheme would be some way distant from the existing built-up area / town centre.	☆ **1**	**2**	**4**	**2**

Objective	Discussion	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
	In **the south-west**, one of the sites under consideration is well located – with good walking access to the train station and town centre – whilst two of the sites are poorly located in that there would be considerable reliance on the private car (although it is fair to assume that there will be a good bus service into town). With regards to the site close to the train station, it is also worth noting that the local area will be the focus of considerable investment in the future (stimulated by the permitted South Wymondham scheme) with the objective of improving access to the town centre from the south of Wymondham. It seems unlikely that fairly modest additional housing growth would have negative implications for objectives, and it might be that additional funding can be made available for supplementary upgrades. The existing 'Connecting South Wymondham' document provides a useful framework for negotiations with developers. In **conclusion**, it is appropriate to conclude that the option of 'nil additional growth' performs best, given that there are no particular issues/opportunities that will be addressed through growth (and there is the fact that growth will lead to problems in terms of access to secondary school education). The option of significant additional growth to the south-west performs worst, and could lead to significant negative effects given that residents at two of the sites would be fairly isolated (plus there would be additional strain on existing services/facilities in Wymondham). The two other approaches that might be taken to delivering additional growth perform roughly on a par.				
S5 Improve the education and skills of the population overall	There are considerable issues locally with regards to secondary school capacity. The Council's position is that any additional growth at Wymondham would lead to a breach of capacity at Wymondham High School (Academy), because the site is land-locked and cannot expand further beyond 2050 pupils (a masterplan is in place to deliver this expansion), leading to a situation whereby students could need to travel an unreasonably long distance to attend secondary school. However, others suggest that additional capacity can be achieved and/or it is not unreasonable to expect children to travel a secondary school in a nearby town. Hethersett High School is located within 3 miles of sites to the north of Wymondham and is less constrained that Wymondham High School (although there can be no certainty regarding capacity to accept pupils from Wymondham, given planned growth in its	1	2	3	3

Objective	Discussion	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
	catchment). Sites to the south-west are more distant, and pupils would need to cross the main A11 to reach Attleborough High School (which again has no certainty of capacity). In **conclusion**, given ongoing discussions there is some uncertainty about the merits of the alternatives, but it is fair to conclude that there is an issue that weighs against the option of additional growth at Wymondham. 'Significant negative effects' can be predicted given that reliance on schools outside of Wymondham would have a range of secondary negative implications for children and communities, i.e. there could be an impact on community cohesion caused by primary school pupils not all being able to attend their 'catchment' high school, Wymondham High Academy. There would certainly be considerable disruption in the short-term, and it unlikely to be the case that this is alleviated in the longer term, given that schools can be unwilling to alter their catchment areas / existing relationships with feeder primary schools. Given these considerations, it is appropriate to conclude that the option of significant growth to the north performs better than the other two 'additional growth' options. Children within the new communities would likely all get the bus (or cycle) to Hethersett.				
S6 Improve the health of the population overall	In terms of access to countryside / open space / green space, it could be suggested that growth either to the north or to the south-west is a good thing given that residents of new communities would have high quality countryside; however, the footpath network is not extensive. Also, there is a need to consider the impact on existing residents. An open space study has highlighted a significant shortfall in access to natural/semi natural open space in Wymondham, particularly to the north of the town, where public access to the countryside is currently limited. Other considerations relate to access to health and leisure facilities. It might be that additional growth option would lead to capacity issues at existing facilities; however, this is uncertain. More notable is the fact that growth to the north of Wymondham would be someway distant from the existing health centre and GP surgery in the town centre. In **conclusion**, the option of nil growth is best performing, with the option of significant additional growth to the north performing worst and having the potential to lead to significant negative effects on the basis of the discussion above.	**1**	***4***	**2**	**3**

Objective	Discussion	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
S7 Encourage local community identity and foster mixed communities with co-operative attitudes, helping to reduce anti-social activity	Additional development to **the north** of Wymondham – i.e. development addition to recent development nearby, and the forthcoming developments at Norwich Common and Carpenters Barn, could lead to positive effects in terms of this objective. There is clearly the potential for something of a distinct community to establish, and the positive effects would be greater under a larger scheme. It is assumed that a large scheme would enable delivery of a primarily school and possibly an associated small local centre. It is noted that when investigating options for a scheme at South Wymondham, advice from Norfolk County Council Children's Services was that a single development of 1000+ dwellings was favoured as the best and most certain way of delivering a primary school, and that from a place-making perspective, a scheme that includes a school site also allows the school to act as a focal point for the new community. With regards to growth to **the south-west**, one of the sites is fairly well located in that it is in close proximity to the forthcoming South Wymondham development (although not adjacent), whilst two of the sites are poorly located (i.e. isolated on the outskirts of the town). In **conclusion**, significant growth to the north could to lead to positive effects, although there is uncertainty. The option of nil growth also performs well, in that the new South Wymondham scheme will be 'welcomed' as a new community within the town (as opposed to being seen as just one of several new extensions to the town). Another important consideration relates to the fact that any additional growth at Wymondham would likely result in children attending **secondary school** outside of the town (see discussion under S5) with negative implications for social networks / community cohesion.	☆ 1	☆ 1	**4**	**3**
S8 Improve the quality of where people live	There are no issues of poor quality environments that will be addressed through development; and it is fair to assume that new development schemes would be developed to a high quality, given the adopted South Norfolk Place-Making Guide SPD (which aims to promote and secure high quality design in new development within the district). On balance, additional growth is unlikely to lead to implications for the baseline situation. It might be suggested that the fact that Wymondham has been the focus of new development recently, and has recently had planning permission granted for several major new schemes, will mean that there is good potential to ensure that any additional schemes are designed to the highest quality; however, this argument is uncertain. It is noted that no Neighbourhood	N/a	N/a	N/a	N/a

Objective	Discussion	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
	Plan is in development.				
EC1 Encourage sustained economic growth	Wymondham and the A11 corridor are recognised as being important to the future of employment growth (particularly hi-tech development) in the Norwich sub-region and indeed Wymondham is recognised as a strategic employment location in the JCS. The main employers in the town include the headquarters of Norfolk Constabulary and Group Lotus at nearby Hethel. The attractiveness and success of Wymondham as an employment location and as a centre for jobs growth is demonstrated by a historically strong uptake of employment land. The South Norfolk Local Plan (2003) allocated 25.4 hectares of employment land in Wymondham. The 2009/10 Annual Monitoring Report published by the Council identified that only 1.39 hectares remained 'available' at the end of 2010. Having said this, it is not necessarily the case that additional housing growth would stimulate further employment growth opportunities to be realised in Wymondham. More likely is that the effect would be to increase the potential for other major employment locations (notably Hethel and Norwich Research Park) to grow, drawing on a suitably skilled local workforce. In **conclusion**, additional housing growth at Wymondham is a positive from an economic growth perspective, although it is not clear that the effects would be significant. When differentiating between the growth options, it is possible to conclude that growth to the north is preferable given good access from this location (by car, at least) to Norwich. Access to Hethel is, however, poor from North of Wymondham.	**4**	**1**	**2**	**3**
EC2 Encourage indigenous and inward investment promoting a positive image of the District	Issues related to movement patterns have been discussed above, under ENV4 and S4. It is probably possible to conclude that growth at Wymondham is a good thing as it is well connected by public transport. Additional growth is not expected to significantly stimulate the town centre due to the continuing "pull" of Norwich, and sites to the north are more remote from the town centre and railway station (closer to Norwich) than sites to the south-west.	**1**	**4**	**2**	**3**
EC 3 Encourage efficient patterns of movement in support of economic growth	Issues related to movement patterns have been discussed above, under ENV4 and S4. It is probably possible to conclude that growth at Wymondham is a good thing as it is well connected by public transport. It is not the case that additional growth is expected to significantly stimulate the town centre in such a way that the effect is to negate for residents	N/a	N/a	N/a	N/a

Objective	Discussion	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
	of the town and surrounding rural area to drive to Norwich.				
EC 4 Social and environmental performance of the economy	No notable implications	N/a	N/a	N/a	N/a
EC 5 Improve the rural economy	No notable implications	N/a	N/a	N/a	N/a

Summary

Additional growth at Wymondham can be seen to be a positive in terms of some objectives, although in some instances this conclusion is predicated on the location and scale of additional growth. Additional growth is likely to be a positive 'full stop' only in terms of: housing need related objectives, particularly given the permitted South of Wymondham scheme is unlikely to deliver on affordable housing targets; and economic growth objectives, given the location of Wymondham close to Norwich and Hethel, and given the town's excellent transport connections.

In terms of some other objectives, additional growth has the potential to lead to positive effects on the baseline, *but only if it is well located*. In terms of 'sustainable transport' related objectives, positive effects could result from a growth strategy that involves small extensions to the north (in proximity to a BRT route) and to the south-west (in proximity to the town centre and railway station); however, there could also be negative impacts given that growth would also likely lead to children having to travel to secondary schools away from Wymondham. In terms of one objective – the need to support innovative 'energy solutions' and hence reduced per capita energy use through the built environment – additional growth could lead to positive effects on the baseline if it is the case that a major new scheme comes forward (thereby enabling economies of scale), which in practice would likely mean delivering a major new scheme to the north (given that a focus of growth to the south-west would involve several smaller schemes promoted by different parties).

In terms of *the majority of objectives* it is suggested that 'nil additional growth' is the preferable to additional growth, regardless of where it is delivered.[1] Notably:

- Landscape and historic environment – growth would have negative effects on landscape, and potentially on the historic environment. Significant negative effects on landscape are certainly predicted for the options that would involve major growth focused at either the North or the South-west (plus there is a need to consider the risk of smaller scale growth to the north extending further out into open countrywide over time, given the scale of the land put forward here). In terms of the historic environment, sensitivities are primarily associated with 'Wymondham as a historic market town in a rural setting' and Gonville Hall to the south-west; and concerns are particularly associated with the option that would involve a large scheme to the south-west (which would necessitate a large scheme to the north of Gonville Hall). Finally, it is worth noting that impacts are predicted notwithstanding that there would probably not be significant

[1] It is important to note that the option of 'nil additional growth' (which is essentially 'the baseline') is not assumed to be characterised by a situation whereby nil additional growth at Wymondham leads to increased pressure for additional growth elsewhere.

Objective	Discussion	Nil additional growth	Significant additional growth to the north	Significant additional growth to the south west	Significant additional growth split
	implications for the key 'strategic considerations' locally, namely the setting of the Abbey or the Wymondham / Hethersett strategic gap. • Secondary school education – with 'significant' negative effects predicted given the known capacity constraints at Wymondham High School, and the potential for secondary impacts on social networks / community cohesion. Other objectives in terms of which 'nil additional growth' is preferable are as follows – • Biodiversity – with the appraisal highlighting that large scale growth to the north would probably be the least worst option • Traffic congestion and associate environmental quality issues – with issues associated with large scale growth to the north in particular • Accessibility to services/facilities - with issues associated with large scale growth to the south-west in particular (although sites to the north are also non-ideal) • Health - with issues associated with large scale growth to the north in particular • Loss of agricultural land – with issues associated with large scale growth to the south-west in particular • Minor considerations relating to sustainable waste management (i.e. recycling/recovery) and flood risk.				

APPENDIX 4: NORTH WYMONDHAM

This appendix presents detailed appraisal findings in relation to the alternatives dealing with 'growth at North Wymondham'. The alternatives are introduced in Chapter 11, above.

Objective	Discussion	Nil	Low	Med	High	V high
ENV1 Maintain and enhance biodiversity, geodiversity, species and habitat quality, and avoid habitat fragmentation	As discussed in Appendix 3, Wymondham is associated with a number of sensitivities and there is a need to plan in-line with the established Wymondham Green Infrastructure Map. The GI map clearly identifies the valley of the River Tiffey as a priority area for conservation, a fact that does not have a major bearing on the alternatives under consideration here. Land under consideration to the north of Wymondham is well away from the river corridor, however, there are some features of interest that could come under pressure. The eastern half of the area under consideration includes several small woodland patches / tree belts and a network of hedgerows, some of which have been identified as contributing to GI locally, and one being seemingly (from an aerial view) being substantial with an associated drainage ditch / stream. The area is unlikely to be highly sensitive though, and in fact there may be the potential to enhance or create woodland or wetland habitats as part of a development scheme, and hence contribute to ecological connectivity to the north of Wymondham. It is noted that a distinct green infrastructure corridor will run through the centre of large permitted scheme at South Wymondham, and so perhaps this could set a precedent for growth to the north (albeit it is recognised that the approach taken to the south reflects a particular circumstance, namely the need to accommodate the river corridor). Such a GI corridor could potentially run north to south between the scheme and the Norwich Common / Carpenters Barn schemes to the east; however, it is recognised that a complete corridor here is unlikely to be possible, as there will be a desire to develop the rugby club. Overall, 'nil additional growth' is the preferable option. The 'very high' growth option performs least well as there would be the likelihood of impacts to the larger woodland patch to the north, adjacent to Downham Grove. Whilst it might be suggested that there is the potential to design-in green infrastructure as part of a large scheme (in such a way that the ecological role of this land is enhanced), there can be no certainty in this respect.	1	2	2	2	5
ENV2 Limit or reduce vulnerability to climate change,	Flood risk is the key consideration under this objective; it is appropriate to conclude that the option of 'nil additional growth' is preferable (see discussion in Appendix 3); however, it is not clear that flood risk need be a major consideration, given the alternatives at hand. There are	1	2	3	4	5

Objective	Discussion	Nil	Low	Med	High	V high
including minimising the risks from flooding	not thought to be any significant areas of flood risk that would hinder development at any of the locations under consideration (i.e. it should be the case that any areas that do intersect can be left undeveloped) although a drainage ditch does run north/south through the Rugby Club site, an area of land that would likely be developed under any option.					
ENV3 Maximise the use of renewable energy solutions and reduce contributions to climate change	Large development schemes give rise to economies of scale and hence the potential to design-in renewable or low carbon energy solutions. As such, it is possible to conclude that the high growth option performs well, and could lead to significant positive effects, in terms of per capita built environment related carbon emissions. The other options would not lead to such opportunities in that they would lead to small schemes (or a large scheme delivered incrementally, if one accepts that a small scheme to the north could become a large scheme over time), although it is not possible to conclude significant negative effects given the range of other factors that will come into play. N.B. Carbon emissions from transport are also an important climate change mitigation consideration, and are considered below (under ENV4).	3	3	3	2	1
ENV4 Reduce the effect of traffic on the environment	As discussed in Appendix 3, a key consideration here is the need to reduce car dependency, and whilst Wymondham is *arguably* a good location for growth in this respect, North of Wymondham is not an ideal location. The preferred option is either 'nil additional growth' or 'low growth', given that low growth would allow development to be focused in relatively close proximity to the BRT route. The 'very high growth' option performs poorly. Whilst there could be the potential to deliver enhanced services / infrastructure, the fact is that the centre-point of the development would be distant from the existing built-up area / town centre / major transport corridors. The 'high growth' option does not perform as badly on the assumption that the scheme would be somewhat linear, hugging the existing urban edge / B1135.	1	1	3	4	5
ENV5 Improve air quality and minimise noise, vibration and light pollution	As discussed in Appendix 3, there are not thought to be any major air / environmental quality issues at present; however, under a growth scenario the potential for increased congestion at some junctions can be anticipated, potentially leading problems. 'Nil additional growth' performs best, whilst the 'very high growth' option performs least well, although it is not possible to conclude significant negative effects given the potential for infrastructure upgrades. It may be that there is a threshold level of growth that is necessary in order to deliver necessary infrastructure upgrades (and hence avoid traffic congestion);	1	2	3	4	5

Objective	Discussion	Nil	Low	Med	High	V high
	however, there is no certainty in this respect at the current time.					
ENV6 Maintain and enhance the distinctiveness and quality of landscapes, townscapes and the historic environment	As discussed in Appendix 3, there is the need to consider the potential to impact on the rural setting of Wymondham, and landscapes that will be appreciated locally. There are also isolated listed buildings to consider, although these are some way distant. Major growth would likely lead to significant negative effects. As well as the 'very high growth' option, the 'high growth' option would lead to significant negative effects on the assumption that development would be somewhat linear, stretching to the west along the B1135 to include a field that is not currently screened from the road. With regards to the 'low' and 'medium' growth options, there should be quite good potential to make use of screening vegetation, and it is also the case that some of the land that would be developed does not currently comprise 'open countryside'; however, there would be a risk of development extending further into open countryside over time, as Tuttles Lane (currently a 'hard' boundary) would have been breached and there is developer interest across a large area.	1	2	2	4	5
ENV7 Minimise the loss of undeveloped land and conserve and improve the quality of soil resources	All growth options would lead to the loss of productive agricultural land, although there is a small area of previously developed land (the nursery site) adjoining the existing built up area that would be developed under any scheme. The rugby club site would also be delivered under any scheme, and whilst this is 'greenfield' land it is not currently in agricultural use.	1	2	3	4	5
ENV8 Improve water qualities and provide for sustainable sources of supply and sustainable use	As discussed in Appendix 3, it is not thought that growth to the north of Wymondham would lead to significant implications in terms of this objective. It may be that higher growth options would lead to some challenges, but there can be little certainty in this respect.	N/a	N/a	N/a	N/a	N/a
ENV9 Minimise the production of waste and increase recycling	As discussed in Appendix 3, there are some issues locally given limited capacity at the Wymondham Household Waste Recycling Centre. As such, it is appropriate to conclude that the 'nil additional growth' option is preferable. Higher growth options perform poorly, given capacity issues in the town and the fact that the household waste recycling centre is someway distant.	1	2	3	4	5

Objective	Discussion	Nil	Low	Med	High	V high
S1 Provide everybody with the opportunity to live in a decent, suitable and affordable home	As discussed in Appendix 3, additional housing growth in Wymondham could help to address housing need issues locally. It may be the case that the sites under consideration are relatively unconstrained in terms of infrastructure, and hence would be able to come forward quite quickly and viably deliver affordable housing to meet understood/anticipated needs; however, there is little certainty in this respect. It is certainly the case that further investigation into a large scheme could identify a need for upgrades to major junctions.	5	4	3	2	1
S2 Reduce poverty, inequality and social exclusion	As discussed in Appendix 3, growth can support regeneration / help to address relative deprivation, but it is not thought that there are issues / opportunities in Wymondham.	N/a	N/a	N/a	N/a	N/a
S3 Offer opportunities for all sections of the population to have rewarding and satisfying employment	As discussed in Appendix 3, the growth strategy for Wymondham does not lead to notable implications in terms of this objective.	N/a	N/a	N/a	N/a	N/a
S4 Improve accessibility to essential services, facilities and the workplace, particularly for those most in need	As discussed in Appendix 3, growth can lead to problems but also opportunities. A large scheme to the north would likely deliver a primary school and possibly an associated small local centre, but at a maximum of 800 homes the scheme would not achieve a similar level of self-containment to the larger South Wymondham scheme. Importantly, there are also draw-backs in that the centre-point of a large scheme would be further from the existing built-up area / town centre. On balance, 'nil additional growth' is preferable, and it is difficult to differentiate between the other options.	1	2	2	2	2
S5 Improve the education and skills of the population overall	As discussed in Appendix 3, the inability of Wymondham High School to expand to accommodate additional children is likely to mean that children would need to be accommodated at schools in nearby towns. This may be achievable, but there will be disruption / secondary negative effects (at least in the short term), which leads to a conclusion that any additional growth at Wymondham would lead to significant negative effects and higher growth options perform least well. N.B. Issues of primary school provision are discussed above, under S4, and there are not thought to be any issues/implications with respect to skills.	1	2	3	4	5

Objective	Discussion	Nil	Low	Med	High	V high
S6 Improve the health of the population overall	In terms of access to countryside / open space / green space, it could be suggested that growth to the north is a good thing given that residents of the new community would have access to high quality countryside; however, the footpath network is not extensive, and it is also important to consider the impact on existing residents. An open space study has highlighted a significant shortfall in access to natural/semi natural open space in North Wymondham, where public access to the countryside is currently limited. Other considerations relate to access to health and leisure facilities. It might be that the 'very high growth' option would lead to capacity issues at existing facilities; however, this is uncertain. More notable is the fact that growth to the north of Wymondham would be someway distant from the existing health centre and GP surgery in the town centre. Overall, the option of nil growth is best performing, with the higher growth options performing worst and having the potential to lead to significant negative effects on the basis of the discussion above.	1	2	3	4	5
S7 Encourage local community identity and foster mixed communities with co-operative attitudes, helping to reduce anti-social activity	As discussed in Appendix 3, a large scheme to the north of Wymondham could foster considerable community identity, although growth could also lead to challenges in this respect if it is the case that children attending different secondary schools acts to divide the community somewhat. The option of nil additional growth also performs well, in that the new South Wymondham scheme will be 'welcomed' as a new community within the town (as opposed to being seen as just one of several new extensions to the town).	1	5	4	3	1
S8 Improve the quality of where people live	As discussed in Appendix 3, the growth strategy for Wymondham does not lead to significant implications in terms of this objective. It might be suggested that a higher growth option performs better than a lower growth option, as 'development in depth' might not lead to additional negative effects on the local community, and might lead to greater potential to comprehensively master-plan / bring forward high quality design; however, this is highly uncertain.	N/a	N/a	N/a	N/a	N/a
EC1 Encourage sustained economic growth	As discussed in Appendix 3, additional growth to the north of Wymondham has the potential to support established economic growth objectives. It is possible to conclude that higher growth options are preferable given good access from this location (by car, at least) to Norwich. Access to Hethel is poor, however.	5	4	3	2	1

Objective	Discussion	Nil	Low	Med	High	V high
EC2 Encourage and accommodate both indigenous and inward investment promoting a positive image of the District	As discussed in Appendix 3, the growth strategy for Wymondham does not lead to notable implications in terms of this objective.	N/a	N/a	N/a	N/a	N/a
EC 3 To encourage efficient patterns of movement in support of economic growth	Additional growth is not expected to significantly stimulate the town centre due to the continuing "pull" of Norwich, and sites to the north are more remote from the town centre and railway station (closer to Norwich) than sites to the south-west.	**1**	**2**	**3**	**4**	**5**
EC 4 Improve the social and environmental performance of the economy	As discussed in Appendix 3, the growth strategy for Wymondham does not lead to notable implications in terms of this objective.	N/a	N/a	N/a	N/a	N/a
EC 5 To improve economic performance in rural areas	As discussed in Appendix 3, the growth strategy for Wymondham does not lead to notable implications in terms of this objective.	N/a	N/a	N/a	N/a	N/a

Objective	Discussion	Nil	Low	Med	High	V high
	Summary Additional growth to the north of Wymondham can be seen to be a positive in terms of some objectives, although in some instances this conclusion is predicated on the scale of additional growth. Additional growth is likely to be a positive 'full stop' only in terms of: housing need related objectives, particularly given the permitted South of Wymondham scheme is unlikely to deliver on affordable housing targets; and economic growth objectives, given the location of North Wymondham close to Norwich. In terms of some other objectives, additional growth has the potential to lead to positive effects on the baseline (or at least avoid negative effects), *depending on the scale of growth.* In terms of one objective –the need to support innovative 'energy solutions' and hence reduced per capita energy use through the built environment – additional growth could lead to positive effects on the baseline if it is the case that a major new scheme comes forward (thereby enabling economies of scale). In terms of 'sustainable transport' related objectives a growth strategy that involves a small extension (in proximity to a BRT route) could mean that negative effects are avoided; however, there is uncertainty given that growth would also likely lead to children having to travel to secondary schools outside of Wymondham. In terms of *the majority of objectives* it is suggested that 'nil additional growth' is preferable to additional growth, regardless of the scale.[1] Most notably: • Landscape and historic environment – growth would have negative effects on landscape, with the likelihood of 'significant' negative effects predicted for options that would involve major growth (plus there is a risk that smaller scale growth to the north would extend further out into open countrywide over time given the scale of land put forward here). These effects are predicted notwithstanding that there would not be significant implications for the Wymondham/Hethersett strategic gap. • Secondary school education – with 'significant' negative effects predicted given the known capacity constraints at Wymondham High School, and the potential for secondary impacts on social networks / community cohesion. • Accessibility to the town centre and railway station – the northern sites are some distance away from the town centre and although reachable by bus, walking and cycling, northern sites may not provide the "easy access" to the town centre that JCS Policy 10 requires and there is potential for development in this part of Wymondham to perhaps look more towards Norwich for some services Other objectives in terms of which 'nil additional growth' is preferable, and in terms of which a low growth option can be considered the 'least worst' option if it is the case that additional growth is necessary, are as follows: • Health • Traffic congestion and associate environmental quality issues • Loss of agricultural land • Minor considerations on sustainable waste management (i.e. recycling/recovery) and flood risk (a *minor* consideration).					

[1] It is important to note that the option of 'nil additional growth' (which is essentially 'the baseline') is not assumed to be characterised by a situation whereby nil additional growth at North Wymondham leads to increased pressure for additional growth elsewhere.

APPENDIX 5: SOUTH-WEST WYMONDHAM

This appendix presents detailed appraisal findings in relation to the alternatives dealing with 'growth at South-west Wymondham'. The alternatives are introduced in Chapter 11, above.

Objective	Discussion	Nil	Site F	Site G	Site H	Site H/I	Sites F & G	Sites G & H	Sites F & H	Sites F, G & H	Sites F & H/I	Sites G & H/I	Sites F, G & H/I
ENV1 Maintain and enhance biodiversity, geodiversity, species and habitat quality, and avoid habitat fragmentation	As discussed in Appendix 3 Wymondham is surrounded by river valleys and woodland as well as a high number of environmentally sensitive areas such as County Wildlife Sites. The GI map clearly identifies the Tiffey **river valley** as a priority area for conservation, a fact that does not have a major bearing on the alternatives under consideration here. Sites under consideration to the south-west are on land above the river valley. Having said this, it might be that there is the potential for surface water to drain into one of two tributaries of the Tiffey (Dyke Beck, which is identified as forming part of the Tiffey Valley sub-regional green infrastructure corridor; or Bays River, which includes an extensive area designated as a County Wildlife Site). It is also worth considering the potential for development to the south-west to impact on the Tiffey river corridor cumulatively, in-combination with the permitted 'South of Wymondham' scheme, which sits adjacent to a sensitive part of the river corridor (the Lizard County Wildlife site; albeit numerous mitigation measures are a condition of the planning permission). Overall, 'nil additional growth' is the preferable option. Whilst it might be suggested that there is the potential to design-in GI as part of a development scheme (in such a way that the ecological role of this land is enhanced), there can be no certainty in this respect. When distinguishing between the other options, a key consideration is probably the desire to conserve /	1	2	4	2	4	7	7	6	10	9	10	12

Objective	Discussion	Nil	Site F	Site G	Site H	Site H/I	Sites F & G	Sites G & H	Sites F & H	Sites F, G & H	Sites F & H/I	Sites G & H/I	Sites F, G & H/I
	enhance the functioning of the Tiffey river corridor. Site G is relatively close to a tributary of the Tiffey (which is associated with a designated as a County Wildlife Site a short distance to the south) and also the South of Wymondham growth area (leading to the potential for cumulative effects). It is not possible to conclude the potential for significant negative effects, given uncertainties on the potential for growth to the south-west to impact on the functioning of the Tiffey river corridor.												
ENV2 Limit or reduce vulnerability to climate change, including minimising the risks from flooding	Flood risk is the key consideration here – i.e. under this objective - however, it is not clear that flood risk is a major consideration, given the alternatives under consideration. There are not thought to be any significant areas of flood risk that would hinder development at any of the locations under consideration. It should be the case that any areas that do intersect can be left undeveloped. The potential for development to lead to increased surface-water runoff and therefore increased flood risk down-stream is a consideration, given the proximity of sites to either the River Tiffey or one of its tributaries; however, there is little reason to suggest significant negative effects. In conclusion, 'nil additional growth' is the preferable option, although it is probably fair to say that, properly controlled/mitigated, none of the options would likely have a significant adverse negative impact on flood risk. Whilst it might be suggested that nil growth will lead to increased pressure at sensitive locations elsewhere, there can be no certainty in this respect. When distinguishing between the other options, it is appropriate to conclude that the	1	2	2	2	5	5	5	5	9	9	9	12

Objective	Discussion	Nil	Site F	Site G	Site H	Site H/I	Sites F & G	Sites G & H	Sites F & H	Sites F, G & H	Sites F & H/I	Sites G & H/I	Sites F, G & H/I
	higher growth options perform worse, although it is not possible to conclude the potential for significant negative effects, given uncertainties.												
ENV3 Maximise the use of renewable energy solutions and reduce contributions to climate change	Large development schemes give rise to the potential to design-in renewable or low carbon energy solutions. However, high growth to the south-west would be spread across several sites, therefore reducing the likelihood of economies of scale being realised that lead to opportunities to design-in ambitious energy solutions. There might be some opportunities associated with development of Site H/I, but this is highly uncertain. N.B. Carbon emissions from transport are also an important climate change mitigation consideration, and are considered below (under ENV4).	5	5	5	5	1	5	5	5	5	1	1	1
ENV4 Reduce the effect of traffic on the environment	As discussed in Appendix 3, a key consideration here is the need to reduce car dependency, and whilst Wymondham is *arguably* a good location for growth in this respect, some of the sites under consideration to the south-west are less than ideal. Site G is well located – with good walking access to the train station and town centre – whilst the other sites are poorly located. It is possible to conclude that development of the sites further from the town centre would lead to significant negative effects, although it is recognised that there is some uncertainty given the potential to deliver an enhanced bus service. It may be that the BRT route passes this site, i.e. if the decision is made to extend the BRT to Attleborough.	2	3	1	3	5	6	6	8	9	11	10	12
ENV5 Improve air quality and minimise noise, vibration	As discussed in Appendix 3, there are not thought to be any major air / environmental quality issues at present; however, under a growth scenario the potential for some increased congestion can be anticipated, potentially	1	2	2	2	5	5	5	5	9	9	9	12

Objective	Discussion	Nil	Site F	Site G	Site H	Site H/I	Sites F & G	Sites G & H	Sites F & H	Sites F, G & H	Sites F & H/I	Sites G & H/I	Sites F, G & H/I
and light pollution	leading problems. The capacity of rural lane is also an issue in the south-west. Also, there is a notable issue around highways / access at Site G; however, it is not clear that there is a risk of issues around air quality / environmental quality. 'Nil additional growth' performs best, and it is likely that additional growth would lead to added risk of problems. Significant negative effects are unlikely, given that there are no major existing issues in the area.												
ENV6 Maintain and enhance the distinctiveness and quality of landscapes, townscapes and the historic environment	As discussed in Appendix 3, Policy 10 of the JCS highlights the need to maintain the historic setting of the town and abbey, whilst also referencing the need to maintain a "Kett's Country" pastoral landscape. With regards to the Abbey, Site F is in relative proximity, but there is limited potential to impact on its setting (i.e. views towards it) given the potential to avoid/mitigate effects through masterplanning and landscaping. There has to be some uncertainty, however, as any erosion of the open agrarian landscape to the south-west of Wymondham might be considered to have an effect on the Abbey's setting. In terms of less strategic considerations, there is a need to consider the role of Wymondham as a historic market town in a rural setting. Site H/I stands-out as having the potential to impact on the rural setting of the town in that development would impact on the approach to the town along the B1172. As things stand, motorists have relatively open views, and are only c.1.5km from the historic town centre (albeit they will first pass a small residential area and an industrial area). Site H/I is also in close proximity to Gonville Hall (a Grade II listed building). It is possible that impacts on its setting	1	3	2	3	9	5	5	5	8	10	10	12

Objective	Discussion	Nil	Site F	Site G	Site H	Site H/I	Sites F & G	Sites G & H	Sites F & H	Sites F, G & H	Sites F & H/I	Sites G & H/I	Sites F, G & H/I
	could be avoided/mitigated, particularly if a small scheme were to come forward on the site (i.e. development of Site G only); however, there is some uncertainty. There is a need to consider the importance that must be attributed to the current setting of the Hall within an open agrarian landscape. There is also a need to consider that development at some sites might not follow existing field boundaries, leading to challenges from a landscaping perspective. In **conclusion**, 'nil additional growth' is the preferable option, given the sensitivities that exist. Development to the north of Gonville Hall would need to would need to be carefully screened and buffered in order to prevent a significant adverse effect.												
ENV7 Minimise the loss of undeveloped land and conserve and improve the quality of soil resources	All growth options would lead to the loss of productive agricultural land, and hence it is appropriate to conclude that a high growth option would lead to significant negative effects.	**1**	**2**	**2**	**2**	**5**	**5**	**5**	**5**	**9**	**9**	**9**	**12**
ENV8 Improve water qualities and provide for sustainable sources of supply and sustainable use	As discussed in Appendix 3, it is not thought that growth to the south-west of Wymondham would lead to significant implications in terms of this objective. It may be that higher growth options would lead to some challenges, but there can be little certainty in this respect.	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a

Objective	Discussion	Nil	Site F	Site G	Site H	Site H/I	Sites F & G	Sites G & H	Sites F & H	Sites F, G & H	Sites F & H/I	Sites G & H/I	Sites F, G & H/I
ENV9 Minimise the production of waste and increase recycling	As discussed in Appendix 3, there are some issues locally given limited capacity at the Wymondham Household Waste Recycling Centre. As such, it is appropriate to conclude that the 'nil additional growth' option is preferable.	1	2	2	2	5	5	5	5	9	9	9	12
S1 Provide everybody with the opportunity to live in a decent, suitable and affordable home	As discussed in Appendix 3, additional housing growth in Wymondham could help to address housing need issues locally. It may be the case that the sites under consideration are relatively unconstrained in terms of infrastructure, and hence would be able to come forward quite quickly and viably deliver affordable housing to meet understood/anticipated needs; however, there is little certainty in this respect.	12	9	9	9	5	5	5	5	2	2	2	1
S2 Reduce poverty, inequality and social exclusion	As discussed in Appendix 3, growth can support regeneration / help to address relative deprivation, but it is not thought that there are issues / opportunities in Wymondham.	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
S3 Offer opportunities for all sections of the population to have rewarding and satisfying employment	As discussed in Appendix 3, the growth strategy for Wymondham does not lead to notable implications in terms of this objective.	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
S4 Improve accessibility to essential services,	As discussed in Appendix 3, growth can lead to problems but also opportunities in the form of infrastructure and additional facilities. None of the individual schemes are of a sufficient scale to deliver additional infrastructure,	1	3	2	3	7	5	5	7	9	11	9	12

Objective	Discussion	Nil	Site F	Site G	Site H	Site H/I	Sites F & G	Sites G & H	Sites F & H	Sites F, G & H	Sites F & H/I	Sites G & H/I	Sites F, G & H/I
facilities and the workplace, particularly for those most in need	when compared to the South Wymondham allocation. Site G is well located with good walking access to the train station and town centre, and there is also the potential for 'synergies' with the adjacent South Wymondham scheme (as discussed in Appendix 3). The other sites are poorly located in that there would be considerable reliance on the private car (although it is fair to assume that there will be a good bus service into town). In conclusion, it is appropriate to conclude that the option of 'nil additional growth' performs best, given that there are no particular issues/opportunities that will be addressed through growth (and there is the fact that growth will lead to problems in terms of access to secondary school education). Development at Site G could be beneficial due to its accessibility to Wymondham town centre and new growth at South Wymondham.												
S5 Improve the education and skills of the population overall	As discussed in Appendix 3, the inability of Wymondham High School to expand to accommodate additional children is likely to mean that children would need to be accommodated at schools in nearby towns. This may be achievable, but there will be disruption / secondary negative effects (at least in the short term), which leads to a conclusion that any additional growth at Wymondham would lead to significant negative effects and higher growth options perform least well. Growth to the south-west, away from the town centre, would also be less than ideal in terms of access to primary school.	1	2	2	2	5	5	5	5	9	9	9	12
S6 Improve the health of the population overall	In terms of access to countryside / open space / green space, it could be suggested that growth to the south-west is a good thing given that residents of new communities would have high quality countryside;	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a

Objective	Discussion	Nil	Site F	Site G	Site H	Site H/I	Sites F & G	Sites G & H	Sites F & H	Sites F, G & H	Sites F & H/I	Sites G & H/I	Sites F, G & H/I
	however, the footpath network is not extensive. Other considerations relate to access to health and leisure facilities. It might be that high growth would lead to capacity issues at existing facilities; however, this is uncertain. Overall, it is not thought that the approach to growth at South-west Wymondham leads to notable implications in relation to health.												
S7 Encourage local community identity and foster mixed communities with co-operative attitudes, helping to reduce anti-social activity	As discussed in Appendix 3, large schemes can help foster considerable community identity, although there could be challenges in this respect if it is the case that the issue of children attending different schools acts to divide the community somewhat. The issue at south-west Wymondham is that the sites are relatively dispersed, although Site G benefits from being in close proximity to the South Wymondham growth area. The option of nil additional growth also performs well, in that the new South Wymondham scheme will be 'welcomed' as a new community within the town (as opposed to being seen as just one of several new extensions to the town).	**1**	**2**	**1**	**2**	**2**	**2**	**2**	**2**	**2**	**2**	**2**	**2**
S8 Improve the quality of where people live	As discussed in Appendix 3, the growth strategy for Wymondham does not lead to significant implications in terms of this objective.	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
EC1 Encourage sustained economic growth	As discussed in Appendix 3, additional growth to the south west of Wymondham has the potential to support established economic growth objectives. It is possible to conclude that higher growth options are preferable given good access from this location (by car, at least) to Norwich and Hethel.	12	**9**	**9**	**9**	**5**	**5**	**5**	**5**	**2**	**2**	**2**	**1**

Objective	Discussion	Nil	Site F	Site G	Site H	Site H/I	Sites F & G	Sites G & H	Sites F & H	Sites F, G & H	Sites F & H/I	Sites G & H/I	Sites F, G & H/I
EC2 Encourage and accommodate both indigenous and inward investment promoting a positive image of the District	As discussed in Appendix 3, the growth strategy for Wymondham does not lead to notable implications in terms of this objective.	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
EC 3 Encourage efficient patterns of movement in support of economic growth	Growth to the South-west of Wymondham is not likely to lead to effects in terms of this objective.	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
EC4 Improve the social and environmental performance of the economy	As discussed in Appendix 3, the growth strategy for Wymondham does not lead to notable implications in terms of this objective.	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
EC 5 Improve economic performance in rural areas	As discussed in Appendix 3, the growth strategy for Wymondham does not lead to notable implications in terms of this objective.	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a

Objective	Discussion	Nil	Site F	Site G	Site H	Site H/I	Sites F & G	Sites G & H	Sites F & H	Sites F, G & H	Sites F & H/I	Sites G & H/I	Sites F, G & H/I

Summary

Additional growth to the south-west of Wymondham can be seen as a positive in terms of some objectives, although in some instances this conclusion is predicated on the scale and location of additional growth. Additional growth is likely to be a positive 'full stop' only in terms of: housing need related objectives, particularly given the permitted South of Wymondham scheme is unlikely to deliver on affordable housing targets; and economic growth objectives, given the location of Wymondham close to Hethel and Norwich.

In terms of some other objectives, additional growth has the potential to lead to positive effects on the baseline (or at least avoid negative effects), *depending on the scale and location of growth.* In terms of 'sustainable transport' related objectives a growth strategy that focuses on accessibility to the train station and town centre could lead to positive effects; however, there is uncertainty given that growth would also likely lead to children having to travel by car/bus to secondary school.

In terms of *the majority of objectives*, it is suggested that 'nil additional growth' is preferable to additional growth, regardless of the scale.[1] Most notably:

- Landscape and historic environment – growth would have negative effects, with the likelihood of significant negative effects on the historic environment (although there are also linked 'landscape' considerations) predicted for options that would involve a large scheme to the north of Gonville Hall.
- Secondary school education – with 'significant' negative effects predicted given the known capacity constraints at Wymondham High School, and the potential for secondary impacts on social networks / community cohesion.

Other objectives in terms of which 'nil additional growth' is preferable, and in terms of which a low growth option can be considered the 'least worst' option if it is the case that additional growth is necessary, are as follows –

- Accessibility to services/facilities
- Car dependency / per capita carbon emissions from transport
- Loss of agricultural land
- Traffic congestion and associate environmental quality issues
- Minor considerations relating to sustainable waste management (i.e. recycling/recovery) and flood risk

[1] It is important to note that the option of 'nil additional growth' (which is essentially 'the baseline') is not assumed to be characterised by a situation whereby nil additional growth at Wymondham leads to increased pressure for additional growth elsewhere.

APPENDIX 6: CERTAIN OTHER SETTLEMENTS

This appendix presents detailed appraisal findings in relation to the alternatives dealing with 'growth at the Poringland (a Key Service Centre) and certain other Service Villages'. The alternatives are introduced in Chapter 11, above.

Objective	Discussion	Option 1 as submitted	Option 2 reduced allocation
ENV1 Maintain and enhance biodiversity, geodiversity, species and habitat quality, and avoid habitat fragmentation	In terms of biodiversity, it might generally be assumed that development at villages (Option 1) will lead to impacts to valued habitats, but this will not necessarily be the case. Two sites set for development under Option 1 stand out because they are set to deliver open space. • The site at Stoke Holy Cross contains a Protected Hedgerow however the plan as submitted (Option 1) allows for the expansion of open space in the area. On the assumption that the Protected Hedgerow is retained, Option 1 would lead to the delivery of a scheme with a positive effect that Option 2 would not deliver. • At Poringland the allocation at POR004 is set to deliver open space in conjunction with POR006. It is noted that the sites all fall within the Norwich hinterland in the NPA which contains a number of strategic Green Infrastructure corridors. The scale of growth under Option 1 is not so significant to raise concerns over loss of habitat, and there is the potential for the sites to contribute towards the Green Infrastructure network and also to benefit biodiversity in-line with DM policy. In conclusion, there is little potential to differentiate between the alternatives, and significant effects are unlikely.		
ENV2 Limit or reduce vulnerability to climate change, including minimising the risks from flooding	Flood risk is a key consideration here, and only one site is affected by flood risk. At the Swardeston site there are problems of surface water drainage particularly on the east side of the village and estate scale development would need to overcome this. SuDS are required as part of the allocation in Option 1, so therefore would not result in a negative effect. Neither option can be said to perform better than the other given the requirement for mitigation under local and national policy.		
ENV3 Maximise the use of renewable energy solutions and reduce contributions to climate change	Neither option is likely to result in a scale of development significant enough to deliver renewable energy solutions on-site. N.B. Carbon emissions from transport are also an important climate change mitigation consideration, and are considered below (under ENV4).	N/a	N/a

Objective	Discussion	Option 1 as submitted	Option 2 reduced allocation
ENV4 Reduce the effect of traffic on the environment	A key consideration here is the need to reduce car dependency (i.e. the frequency of car use and the need to travel longer distances by car) amongst local residents, and hence per capita transport-related carbon emissions. Traffic can also impact the environment in other ways (e.g. traffic congestion can impact on air quality), as discussed separately below (under ENV5). Key Service Centres and Service Villages tend to be less accessible than more urban areas in terms of public transport, walking and cycling infrastructure. The position of the Key Service Centres and Service Villages low down in the settlement hierarchy is reflective of the relative lack of services that these settlements have, which is likely to increase the need to travel (when compared to development focussed at higher 'tiers'). Furthermore, bus services are likely to be limited (and it is not the case that the scales of growth being considered under Option 1 will lead to enhanced services). Having said this, the settlements under consideration are located close to Norwich and Hethel for employment opportunities which reduces the need to travel longer distances by car. In terms of the individual sites, Newton Flotman has a limited range of services but has direct links to Norwich on the A140; Swardeston has a range of services within walking distance and reasonable connection to both Norwich and Mulbarton; Stoke Holy Cross is close to services including school, bus and recreation facilities. Poringland is a central brownfield site with good access to services in a Key Service Centre, the highest 'tier' of the settlements considered. In conclusion, it is possible to conclude that a reduced quantum (Option 2) is the preferable option, but it is not possible to conclude significant effects.	**2**	**1**
ENV5 Improve air quality and minimise noise, vibration and light pollution	There are not thought to be any major issues around air / environmental quality at present. Under a higher growth scenario (Option 1) the potential for increased congestion at some junctions can be anticipated, but this would be unlikely to lead to air quality / environmental quality implications. Stoke Holy Cross has fairly poor/indirect access to the Norwich Ring Road and the A140 via narrow roads and at 50 dwellings is the largest site that could be allocated/de-allocated. Although lower growth would likely have lesser impacts in terms of congestion, air quality and noise impacts are not likely to be significant.	**2**	**1**
ENV6 Maintain and enhance the distinctiveness and quality of landscapes, townscapes and	The sites as submitted (Option 1) have a number of issues in terms of this objective, however the site-specific policies require mitigation measures as a condition of planning permission. At Swardeston, sensitive design is required in order to prevent negative effects on nearby Listed Buildings, the Southern Bypass Landscape Protection Zone and a TPO within the site. The site is also of archaeological interest which would need to be investigated prior to development. The Newton Flotman site policy requires soft landscaping as it intrudes into agricultural land. The allocation at Bracon Ash will require landscape mitigation in order to avoid harming the setting of Mergate Hall.	**2**	**1**

Objective	Discussion	Option 1 as submitted	Option 2 reduced allocation
the historic environment	Overall, Option 2 is the preferred approach in terms of this objective as it would require less mitigation.		
ENV7 Minimise the loss of undeveloped land and conserve and improve the quality of soil resources	Four of the five sites under consideration (i.e. those set for allocation under Option 1) would lead to the loss of greenfield land, the one exception being at Poringland (which also overlies a mineral deposit and may need prior extraction before development). The site at Stoke Holy Cross would result in the loss of better quality, Grade 2 agricultural land. Through less landtake of greenfield land, Grade 2 land and sterilising less land that contains minerals; Option 2 is considered to be the preferred approach – however the difference of 118 dwellings over four sites is not likely to be significant.	**2**	☆ **1**
ENV8 Improve water qualities and provide for sustainable sources of supply and sustainable use	It is not thought that the allocation of 118 dwellings on sites in the Key Service Centre and Service Villages will lead to significant implications in terms of this objective; although it is noted that a number of the sites are required to be able to demonstrate that wastewater infrastructure be confirmed prior to development. The site at Swardeston is required to deliver SuDS to address surface water flooding issues, which may have a minor positive effect in terms of improving water quality.	N/a	N/a
ENV9 Minimise the production of waste and increase recycling	No implications.	N/a	N/a
S1 Provide everybody with the opportunity to live in a decent, suitable and affordable home	Either option would support achievement of this objective, providing the Floating 1800 housing target is met across the NPA. It is not the case that there is any evidence of housing need issues specific to any one village that would be addressed under Option 1, but not under Option 2.	☆ **1**	☆ **1**
S2 Reduce poverty, inequality and social exclusion	Neither option is likely to lead to a significant effect, given the degree to which the alternatives vary the quantum of growth at the settlements in question. Option 1 would lead to development in relatively less accessible locations (see ENV4) where there might be a risk of social exclusion, but equally it will better enable people to remain in the village that they associate with (and where their social networks are) and may support the vitality / viability of village centres to some extent. Newton Flotman in	☆ **1**	**2**

Objective	Discussion	Option 1 as submitted	Option 2 reduced allocation
	particular has a low level of services. On balance, it is appropriate to conclude that Option 1 is preferable as there are existing issues of 'rural deprivation' and development at villages has the potential to address this to some extent.		
S3 Offer opportunities for all sections of the population to have rewarding and satisfying employment	Option 1 would not allocate land for employment; however sites are all in reasonable proximity to employment opportunities at Norwich and Hethel. No significant effects are predicted, but Option 1 can be said to perform more favourably. It might also be suggested that Option 1 will support wider 'rural economy' objectives, but this is less clear.	1	2
S4 Improve accessibility to essential services, facilities and the workplace, particularly for those most in need	Neither option is likely to lead to a significant effect, given the degree to which the alternatives vary the quantum of growth at the settlements in question. Option 1 would lead to development in relatively less accessible locations (see ENV4), but equally it may support the vitality / viability of village centres to some extent. Newton Flotman has a low level of services but is well located for access to Norwich; whilst Poringland has the most services of all of the site options and the site is well-located to services in the village. On balance, it is appropriate to conclude that lower growth at villages (Option 2) is preferable.	2	1
S5 Improve the education and skills of the population overall	The Stoke Holy Cross site actively facilities expansion of the adjacent school site. A reduction in the size of the allocation could negatively affect school provision increasing pressure on the school and others nearby. Option 1 therefore performs more favourably, given no evidence of constraints at any of the villages set to receive growth.	1	2
S6 Improve the health of the population overall	Access to open space is a key consideration in terms of health and wellbeing. Two sites under Option 1 are set to deliver additional open space – Poringland (natural/semi-natural greenspace) and Stoke Holy Cross (public open space). Poringland is in an area of open space deficiency; however, any on-site open space requirement would be negotiated through a S106, and couldn't remedy an existing deficit. Other considerations relate to the wider determinants of health including accessibility to healthcare facilities, access to employment opportunities and leisure/recreation. As discussed under ENV4, Option 1 would deliver more growth at locations lower down the settlement hierarchy with relatively poor access, and the likelihood of car dependency (as opposed to walking/cycling). It is noted that sites at Newton Flotman and Poringland have good access to the nearest GP facility.	2	1

Objective	Discussion	Option 1 as submitted	Option 2 reduced allocation
S7 Encourage local community identity and foster mixed communities with co-operative attitudes, helping to reduce anti-social activity	Greater development at the Key Service Centre and Service Villages (Option 1) could help to support the local community by increasing the ability for people to remain in the village (due to a larger available housing stock). Option 1, the higher growth approach, is therefore likely to be more beneficial in terms of this objective. There might be the potential for significant positive effects, but this is highly uncertain.	1	2
S8 Improve the quality of where people live	The nature of the effect in terms of this objective is highly dependent on the quality and design of the development delivered. There are not considered to be any significant implications assuming good design (in line with DM policy). The sites at Stoke Holy Cross and Poringland (Option 1) both contribute open space provision which is considered to improve the quality of those locations; however, it is not clear that benefits would be felt by existing residents.	N/a	N/a
EC1 Encourage sustained economic growth	Neither option is likely to have a significant effect in terms of this objective as they deliver housing, not employment land. All of the sites are within the Norwich Policy Area and near Norwich so should help to contribute towards economic growth and inward investment in the Norwich sub-region; however, on balance effects are minor.	N/a	N/a
EC2 Encourage and accommodate both indigenous and inward investment promoting a positive image of the District	As above.	N/a	N/a
EC 3 To encourage efficient patterns of movement in support of economic growth	As discussed under ENV 4, car dependency can be anticipated, although distances travelled will often be fairly short. On balance though, effects are very minor in terms of this objective.	N/a	N/a
EC 4 Improve the social and environmental performance of the	Matters relating to supporting the rural economy are discussed under S2 above; however, any effects in terms of this objective (i.e. objective EC4) would be minor.	N/a	N/a

Objective	Discussion	Option 1 as submitted	Option 2 reduced allocation
economy			
EC 5 To improve economic performance in rural areas	Option 1 allocates a higher quantum of growth in rural settlements; which should help to maintain and enhance rural service provision and support delivery of housing for rural workers. Option 1 is certainly preferable, but the scale of development (118 dwellings, spread across a number of settlements) would probably not lead to significant effects.	1	2
Summary The appraisal highlights that Option 1 performs best in terms of most socio-economic objectives, specifically those relating to the vitality of rural communities and the rural economy. Car dependency can be anticipated, but it is noted that there would be good potential to access employment at not-to-distant locations. Whilst it is recognised that there could be merit to reducing growth in the rural area in terms of some environmental objectives, it is not thought that the scale of additional growth under Option 1 (118 dwellings in total, spread across five sites) leads to major concerns. Even in settlements such as Stoke Holy Cross, where Option 1 is significantly different than the reduced allocation in Option 2, it is considered that this would be unlikely to cause any significant sustainability issues or problems. There is no evidence that additional housing in Stoke Holy Cross, or any of the other lower order settlements under consideration, would lead to unacceptable pressures on services and facilities such as schools and doctors or lead to the exacerbation of problems such as flooding.			

APPENDIX 7: SCREENING PROPOSED MAIN MODIFICATIONS

This appendix lists those Proposed Main Modifications that were screened out of detailed appraisal, i.e. those which are not referenced within the appraisal presented in Part 3 above.

Proposed Main Modifications that were screened out can be categorised as one of the following:

- Minor technical clarification/change (e.g. updates to referenced documents etc.)
  - In many instances proposed modifications update text to reflect the fact that planning permission has now been granted for a particular site. Such modifications cannot be said to have an effect, although they do mean that there is a need to review the appraisal of the draft plans presented within the published/submitted SA Reports.[24]
- Procedural clarification/change (e.g. additional supporting text on how a policy would be implemented, without altering policy wording itself).
- Minor changes to policy wording that would not alter how a policy would be expected to be interpreted and/or implemented (e.g. changes to policy wording and/or supporting text to improve readability or to remove ambiguous wording).

Development Management Plan

Mod Ref	Page	Policy / Paragraph	Reason for screening out the Proposed Main Modification[25]
DM MM1	7	Para 0.1	Minor technical clarification/change
DM MM2	9	Below para 0.10	Procedural clarification/change
DM MM3	10	Para 0.20	Procedural clarification/change
DM MM4	14	Para 0.34	Minor policy wording change
DM MM6	15	Para 1.4	Minor technical clarification/change
DM MM7	17	Para 1.13	Minor technical clarification/change
DM MM8	19	Policy DM1.1	Minor policy wording change
DM MM9	20	Policy DM 1.1 notes	Minor technical clarification/change
DM MM11	22	Para 1.19	Minor policy wording change
DM MM17	28	Policy DM1.4	Minor policy wording change
DM MM21	32	Policy DM2.1	Minor technical clarification/change
DM MM22	34	Policy DM2.2	Minor policy wording change
DM MM25	42	Policy DM2.5	Minor technical clarification/change
DM MM26	44	Policy DM2.6	Minor technical clarification/change
DM MM27	45	Para 2.41	Minor technical clarification/change
DM MM28	45	Policy DM2.7	Minor technical clarification/change
DM MM30	49	Policy DM2.9	Minor technical clarification/change
DM MM37	63	Policy DM3.2	Minor technical clarification/change
DM MM39	71	Para 3.39	Minor technical clarification/change
DM MM40	72	Policy DM3.5	Minor technical clarification/change
DM MM41	73	Para 3.49 & DM3.6	Minor technical clarification/change
DM MM42	75	Policy DM3.7	Minor policy wording change
DM MM43	76-77	Policy DM3.8	Minor policy wording change
DM MM44	78-79	Policy DM 3.9	Procedural clarification/change
DM MM46	81	DM3.10	Minor technical clarification/change
DM MM47	83	DM3.11	Minor technical clarification/change
DM MM48	86	Para 3.86	Minor technical clarification/change
DM MM49	87	Policy DM3.13	Minor technical clarification/change
DM MM60	112	DM 4.5	Minor technical clarification/change
DM MM62	115	Policy DM4.6	Minor policy wording change
DM MM64	122	Policy DM4.9	Minor policy wording change
DM MM65	123	Para 4.79	Minor technical clarification/change
DM MM66	123	Policy DM4.10	Minor policy wording change

[24] i.e. if the SA Report concluded that the draft plan would likely lead to a significant positive effect because of a proposed allocation, but that allocation is now a planning permission, then there is a need to revise the predicted effect and vice versa.
[25] On the basis that there is little potential for significant effects or the proposed modification is not likely to have implications for the appraisal of the draft plan as set out in the 2014 SA Report.

Mod Ref	Page	Policy / Paragraph	Reason for screening out the Proposed Main Modification[25]
DM MM72	134	6.1 Glossary	Minor technical clarification/change
DM MM73	N/A	New Annex 2	Minor technical clarification/change

Site Specific Allocations and Policies

Mod Ref	Page	Policy / Settlement	Reason for screening out the Proposed Main Modification[26]
SITES MM1	10	Below paragraph 4.8	Procedural clarification/change
SITES MM3	18	Paras 7.15 & 7.16	Minor technical clarification/change
SITES MM4	22	Table 7.3	Minor technical clarification/change
SITES MM5	24	Para 7.22	Minor technical clarification/change
SITES MM7	26	Table 8.2	Minor technical clarification/change
SITES MM8	26	New diagrams and text at para 8.6	Minor technical clarification/change
SITES MM19	71	Policy COL3	Minor policy wording change
SITES MM20	73	Trowse supporting text	Minor technical clarification/change
SITES MM25	84	Policy DIS8	Procedural clarification/change
SITES MM28	100	Poringland	Minor technical clarification/change
SITES MM29	101	POR 1	Minor technical clarification/change
SITES MM32	113-114	Policy LOD1, DM 1.3 & Inset Map 11 (Policies Map)	Minor technical clarification/change
SITES MM34	N/A	Loddon Inset Map 11, Policy DM 2.4 & DM Map 2.4 & 2.5(5) Loddon	Minor technical clarification/change
SITES MM35	124	Policy LIT1, Little Melton Inset Map 14, Policy DM1.3	Minor technical clarification/change
SITES MM36	127	Mulbarton Inset Map 16, Policy MUL1, Policy DM1.3	Minor technical clarification/change
SITES MM37	138	Policy STO1, Stoke Holy Cross Inset Map 19, Policy Dm1.3	Minor technical clarification/change
SITES MM42	203	Policy DM4.11 and Pulham St Mary Inset Map (Policies Map)	Minor technical clarification/change
SITES MM47	270	Policy DM1.3 and Claxton Inset Map (Policies Map)	Minor technical clarification/change
SITES MM49	N/A	New Appendix	Procedural clarification/change
SITES MM50	N/A	Various settlements	Minor technical clarification/change
SITES MM54	Various	Policies HIN1, LOD1, DIS3, DIS4, HAR1	Minor technical clarification/change

Wymondham Area Action Plan

Mod Ref	Page	Policy / Statement	Reason for screening out the Proposed Main Modification[27]
WAAP MM1	7	New para 1.15 (renumber all subsequent paragraphs)	Procedural clarification/change
WAAP MM2	13	Para 1.50	Procedural clarification/change
WAAP MM3	13	New para 1.51	Procedural clarification/change
WAAP MM5	20	New para 5.4 (with re-numbering of subsequent paragraphs) and new Appendix 5	Minor technical clarification/change
WAAP MM8	24	Para 5.11, policy DM1.3 and DM1.5 and Policies Map	Minor technical clarification/change
WAAP MM21	45	WYM 14	Minor technical clarification/change
WAAP MM22	48	WYM 16	Minor policy wording change
WAAP MM25	51	WYM 19 (to be WYM 18)	Minor policy wording change
WAAP MM26	56	Policy WYM 21 (to be WYM 20)	Procedural clarification/change
WAAP MM29	N/A	New Appendix 6	Procedural clarification/change

[26] On the basis that there is little potential for significant effects or the proposed modification is not likely to have implications for the appraisal of the draft plan as set out in the 2014 SA Report.
[27] On the basis that there is little potential for significant effects or the proposed modification is not likely to have implications for the appraisal of the draft plan as set out in the 2014 SA Report.