

Statement for Hearing

A & J Patching, R. Walkley, L.Liggins.

Appendices List

Appendix number	Title
1	Minutes of SG meeting September 2020
2	Site allocation policy
3	JP letter to Parish Council December 2024
4a	PC response to JP letter above
4b	Clarification letter to JP from SNC
5	Email from Chair to Steering Group 29th July 2024
6	Email from Chair to Steering Group 30th July 2024
7a	JP resignation email
7b	AP resignation email
8	Email 8.10.24 from AG to SG
9a	October 2024 draft SEA
9b	Comments by J & A Patching to Chair of SG re October 2024 draft SEA
10	Table 3.2 in graph form
11	Presentation to PC by Chair of SG 8th July 2024
12	https://www.dissexpress.co.uk/news/village-development-plans-could-see-excessive-expansion-9357520/
13	https://www.edp24.co.uk/news/21172736.plans-22-new-homes-coffee-shop-norfolk-village-given-go-ahead/
14	Dickleburgh and Rushall PC website with January 2023 SEA link
15	Dickleburgh and Rushall PC website no minutes available after Feb 2025
16	HELAA table and resident's preferences
17	Email from JP to chair of SG regarding changes to SG members

Appendix 1

Meeting of PC Steering Group September 17th 2020

The vote 17 th September 2020

The final decision on the site going forward was taken and agreed on 17 th September 2020. Public surveys regularly indicated that residents considered the popular area of development was away from Harvey Lane and Rectory Road. This excluded significant numbers of sites an effectively provided 4 options. Identified in the SEA as option 1 The proposed site, option 2 East of Ipswich Road, option 3 West of Ipswich Road and the brownfield site. Option 4 west of the Norwich Road (see SEA page iv).

Site 3 and 4 both sit at the entrance to the Village of Dickleburgh on the Ipswich Road. There are a number of factors which need to be taken into account when considering those sites.

The decisions were guided by the following considerations:

Rurality

This area is designated as populated by nucleated villages. 2 Dickleburgh is a nucleated village. We see this evidenced on the ground :

As you move away from the centre of the village the distance between properties should increase and the area of land the property is on should increase. This need will apply to all sites.

2 <https://www.southnorfolkandbroadland.gov.uk/downloads/file/1326/land-use-consultants-2001-b4-waveney-tributary>

Views and Vistas

We must protect all the long views and vistas. Must protect views into and out from the village of Dickleburgh. This requirement particularly affects the sites on the Ipswich Road.

Beautification

There is an opportunity through development, to improve the scenic look and visual impact of the village and setting. Including: landscaping, open green spaces, creation of ditches and verges, green entrances and exits, replacing trees with mature trees with a minimum length of maintenance. We would recommend 20 years. Beautification particularly affects the Ipswich Road sites as they are within very close proximity of a Grade 2* listed building and a grade 2 listed building. East of Ipswich Road has the historic entrance to Common Road.

Density

When assessing the density of a site. The site must comply all policies within the Neighbourhood Plan and with the principles of rurality and design. In addition, it must safeguard all identified views and vistas. When considering the density of any site, density should be determined by habitable rooms. The minimum (23) requirement is each home should have a distance of 15 metres garden depth. Density of a site must reflect the surrounding densities using the least density as a model and not the most dense example. Failure to do this, would fail to maintain rurality. Density issues are most acute on the sites on the Ipswich Road as they need to reflect the houses on Ipswich road and increase the spaces between properties as they move away from the centre of the Village. The smallest garden must be bigger than the biggest garden on the exit on Ipswich Road.

Infill

When a building is categorised as an infill it must reflect all the requirements of Density, beautification and rurality. It must not impinge upon or alter long vistas and views which are defining aspects of the county as identified by the South Norfolk Landscape Assessment. comply with rurality

Site specific requirements

Site 1 GNLP 0516 not including site 18

Policies and Issues related to this site

Cordon Sanitaire (400 metres) – no building within the limits of the cordon sanitaire
Heritage Views maintained
Heritage sites protected and remain
Views and Vistas maintained. In particular views from the Norwich Road across to the A140, views to the church, views from the church.
Footpath 3 – is a green walk (path) and should remain a green walk (path)
Rurality
Flooding of the Norwich Road – flooding regularly occurs The site must not exacerbate this issue
Providing all aspects can be resolved this is the principal preferred site. It is expected that this site could deliver in excess of 40 homes.
Yes 8 No or undecided 1
Adding site 18 to site 1
Yes 2 No or undecided 7
Site 1 is proposed exclusively and does not include additional areas.

Site 2 GNLP 0361

Policies and Issues related to this site
Views out of the Village
Views into the Village
Biodiversity
Site lines to the Church – this is a particularly important issue for the current residents
Flooding on Ipswich road - flooding regularly occurs The site must not exacerbate this issue
Transport. Cars must not reverse out.
Parking. No parking nose to tail.
Rurality – particularly in relation to garden sizes around the site.
NP Density requirements
Beautification – views. No parking in front of houses.
The initial site is brownfield – the potential extended site is green field.
Clarification need regarding the current status of the garage
Positives
It could improve the current locality if there were a strong emphasis on beautification (including increasing biodiversity throughout the site).
Negatives
Must not impede views of the church tower as you approach the village. The first buildings on Ipswich Road should therefore be bungalows
Nose to tail parking cannot be permitted
Parking in front of buildings this not supported through beautification
The current proposals are not acceptable. It does not conform to rurality, parking, density requirements.
Current proposed densities are unacceptable.
Providing all aspects can be resolved then this is a preferred site. It is expected that this site could deliver around 15 homes.
Brown field element only
Yes 9 No 0
Enlarged site including the green field area with densities as currently presented by Tricker and Last
Yes 0 No 9
This site was subsequently withdrawn by the developer.

Site 3 (West of Ipswich Road GNLP 0390)

Policies and Issues related to this site
Views out of the Village
Views into the Village
Biodiversity
Site lines to the Church – this is a particularly important issue for the current residents
Rurality – particularly in relation to garden sizes around the site, entry
NP Density requirements
Beautification - views
Listed buildings

Rich in biodiversity
Outside of the development area

This is the least popular site.
Development must be linea.
Vote: Yes 0 No 9
This site is rejected.

Site 4 (East side of Ipswich Road (GNLP 0498)

Policies and Issues related to this site

Views out of the Village

Views into the Village

Biodiversity

Site lines to the Church – this is a particularly important issue for the current residents

Rurality – particularly in relation to garden sizes around the site, entry

NP Density requirements

Beautification - views

Listed buildings

Rich in biodiversity

Heritage site

Outside of the development area

Entry to the site must not be via Ipswich Road

Development must be linea.

Positives

If entry to the site were via Common Road then it would not impact upon traffic – there would need to be biodiversity compensation, however the entrance will need to be beyond the wooded area at the entrance of Common Road.

The small area of the site

Vote: Yes 5 No 4

The enlarged site only on the basis that entry to the site is via Common Road and only if site 1 and 2 are unable to deliver to expectation.

Vote: Yes 5 No 4

This site is accepted only on the basis that sites 1 and 2 do not deliver the required number of homes. Should the number of homes be achieved through the delivery of sites 1 and 2 then this site is rejected.

This site is rejected on the basis that current preferred sites can deliver the expectations.

Hierarchy of sites

1 site 1

2 Site 2

3 Site 4 – only if sites 1 and 2 fail to achieve the desired number of homes allocated to the parish.

POLICY DR20: Allocation

The Neighbourhood Plan allocates the 5.33-hectare site SN0516 (figure X) for residential development, to accommodate up to 25 new homes of mixed type, tenure and size. The mix should include

Starter homes.

Affordable Homes (minimum requirement as stated in the Local Plan)

Custom built homes.

Lifetime homes.

In addition to all other development policies, the site requires the following:

- a. The delivery of a coordinated approach to design, layout, landscaping, infrastructure provision across the site through a site masterplan.
- b. A detailed heritage statement that identifies any impacts on heritage assets (as identified in policy X). The area contains pre-Roman and Roman archaeology.
- c. Preservation of the rural nature of the site through the provision of wildlife corridors.

- d. Protection and enhancement of footpath 3 (figure X).
- e. The protection and enhancement of a landscape belt along the north, eastern and western boundary of the site (figure X).
- f. Retention and enhancement of existing trees and hedgerows.

Where possible, the developer of the site is encouraged to incorporate sustainable and/or innovative design and construction principles to achieve net zero carbon emissions during construction and realise sustainability improvements over and above those set by Building Regulations which will be particularly encouraged.

Evidence to support DR 20

Strategic Environmental Assessment (SEA) for the Dickleburgh and Rushall
Neighbourhood Plan Environmental Report Dickleburgh and Rushall Parish Council
January 2023

8. Site allocation policy

The DRNP is required to allocate a minimum of 25 new homes over the plan period up to 2042. This number exceeds the South Norfolk identified local need for Dickleburgh but complies with the South Norfolk and Broadland District Councils Village cluster allocation.

The NPPF and Local Plans provide a steer on where to locate new housing. The NPPF highlights the need to allocate land with the least environmental or amenity value. Elsewhere there is strong support for brownfield land for housing within settlements, and support for having due regard to the intrinsic character and beauty of the countryside. There is also support for development in locations that have good access to local amenities and services using sustainable transport. The NPPF focuses on the need to promote sustainable development in rural areas, requiring housing to be located where it will enhance or maintain the vitality of rural communities.

The 2015 SNLP Policy DM 1.3 requires development to be located sustainably and aims to restrict development in the open countryside. The DRNP strategy for allocating sites has aimed to do this, allocating a site adjacent to the existing settlement.

18 sites came forward through the GNLP call for sites, all of them around the Village of Dickleburgh. A further 3 sites came forward as part of the Village Clusters call for sites also within the Village of Dickleburgh.

The 18 sites were assessed using the Dickleburgh and Rushall HEELA adapted from the South Norfolk HEELA. The Dickleburgh and Rushall NP HEELA assessment included access to site, access to services and facilities, utilities capacity, utilities infrastructure, contamination and ground stability, flood risk, market attractiveness, locally significant landscape, village scape, biodiversity geodiversity, historic landscape, open green infrastructure, transport and roads, compatibility with adjacent sites.

The further 3 sites were assessed using the same HEELA process.

The DRNP assessments were further, independently assessed, by AECOM as part of the national support framework for neighbourhood plans. Overall, 21 sites have been assessed across the DRNP area.

The detailed Strategic Environmental Assessment (SEA) report used a range of criteria to assess the potential sites, biodiversity and geodiversity, climate change, landscape, historic environment, land soil and water resources, community well-being, and transportation. The SEA identified 2 plausible options for delivery of the Dickleburgh and Rushall requirement of 25 homes¹. The SEA section 7 outlines the final decision-making process and identifies the challenges.

8.2 Site score

Site SN0516 has been assessed as the most desirable on the basis that it scores favourably on the site criteria below. Site SN0516, therefore, has allocated site status.

¹[h"ps://www.dickleburghandrushallpc.org.uk/files/ugd/efa034_c0f187db07364759ad6907d490091152.pdf](https://www.dickleburghandrushallpc.org.uk/files/ugd/efa034_c0f187db07364759ad6907d490091152.pdf) secDon 6 p.19ff

Score CRITERIA				
Final Score /84	Access to site	Access to Services facilities		Utilities
capacity	Utilities			
infrastructure	Contamination	Flood risk	Market attractiveness	Locally
Significant Landscape	Town Scape	Biodiversity	Geodiversity	Historic Environment
Open Space	Green infrastructure	Transport and Roads		Compatibility with adjacent sites

The site sits well within the village scape, it is relatively well-hidden laying between the West of the Village and the A140. It does not impact the linear nature of the entry to the village from the north or south. It will not create a hard boundary to the west and given the size of the site, the developer will be able to fully comply with the requirements of rurality and beautification. The site is located well for amenities providing walking access to the Village shop (within 150m), the local bus stop, church, Village Hall, playing fields and primary school (within 350m), via pavement and green footpath. Close access to the bus stop in the centre of the Village (150m) is a particular advantage as residents will be able to avail themselves of any regular bus service and enable secondary school aged children to access the bus service to local secondary schools. Vehicle access to the site will be via the Brandreth Close entrance on Norwich Road.

This is a large greenfield site, comprising 5.33 Hectares, thereby offering opportunities to fully embrace the requirements of rurality, provide space to mitigate against flooding, opportunities for significant water harvesting, carbon capture / offsetting schemes and strategies to increase biodiversity net gain. The site is West of the Norwich Road and the development known as Brandreth Close.

The site is screened on all sides by mature trees and hedgerows and has a green tree and ditch corridor to the north and south. It should therefore, with sensitive design, sit well within the views and vistas of the Parish and the Village of Dickleburgh. The site abuts a Local Green Space (LGS) on the Eastern border. It therefore provides an opportunity to enhance the corridors through habitat creation and improvement and enhance the LGS through sensitive design. There is an expectation that a proportion of the site will be devoted to new open green spaces and that the site will be populated with trees and water ways to encourage and retain habitation areas within the site. Boundary trees and hedgerow should be protected for their ecological value. All new roads will have ditches and hedgerows to further enhance biodiversity and increase the opportunity to capture CO2. The allocation of this site was supported by the public survey of 2017 and the NP site analysis meeting of 2019.

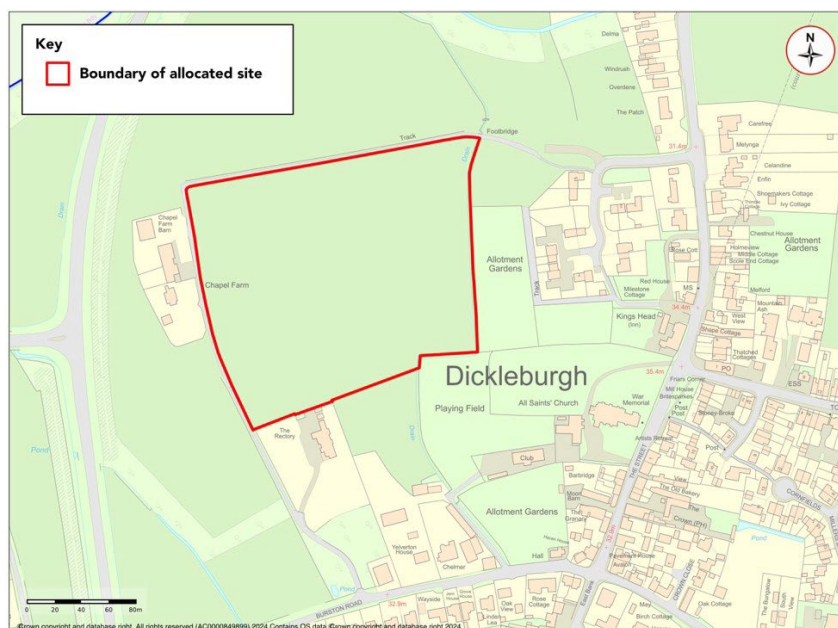


Figure X: Boundary of allocated site (source: Parish Online, with own annotations).

The site is within the Historic Core of Dickleburgh, care will need to be taken to celebrate this. There will be a particular focus on good design of new homes to ensure a strong cohesive link with the historic character of the nearby Conservation Area, the listed buildings and NDHVSS. The developer has the opportunity to create a strong green infrastructure through the development, enabling a green corridor to emerge that can link with the already established corridors.

A development of this scale has an opportunity to support delivery of low carbon infrastructure with high standards of sustainable design and construction.

The identification of this site is supported by the SEA process.

The vote 17th September 2020

The final decision on the site going forward was taken and agreed on 17th September 2020. Public surveys regularly indicated that residents considered the popular area of development was away from Harvey Lane and Rectory Road. This excluded significant numbers of sites an effectively provided 4 options. Identified in the SEA as option 1 The proposed site, option 2 East of Ipswich Road, option 3 West of Ipswich Road and the brownfield site. Option 4 west of the Norwich Road (see SEA page iv).

Site 3 and 4 both sit at the entrance to the Village of Dickleburgh on the Ipswich Road. There are a number of factors which need to be taken into account when considering those sites.

The decisions were guided by the following considerations:

Rurality

This area is designated as populated by nucleated villages.² Dickleburgh is a nucleated village. We see this evidenced on the ground :

² <https://www.southnorfolkandbroadland.gov.uk/downloads/7ile/1326/land-use-consultants-2001-b4-waveney-tributary>

As you move away from the centre of the village the distance between properties should increase and the area of land the property is on should increase. This need will apply to all sites.

Views and Vistas

We must protect all the long views and vistas. Must protect views into and out from the village of Dickleburgh. This requirement particularly affects the sites on the Ipswich Road.

Beautification

There is an opportunity through development, to improve the scenic look and visual impact of the village and setting. Including: landscaping, open green spaces, creation of ditches and verges, green entrances and exits, replacing trees with mature trees with a minimum length of maintenance. We would recommend 20 years. Beautification particularly affects the Ipswich Road sites as they are within very close proximity of a Grade 2* listed building and a grade 2 listed building. East of Ipswich Road has the historic entrance to Common Road.

Density

When assessing the density of a site. The site must comply all policies within the Neighbourhood Plan and with the principles of rurality and design. In addition, it must safeguard all identified views and vistas. When considering the density of any site, density should be determined by habitable rooms. The minimum (23) requirement is each home should have a distance of 15 metres garden depth. Density of a site must reflect the surrounding densities using the least density as a model and not the most dense example. Failure to do this, would fail to maintain rurality. Density issues are most acute on the sites on the Ipswich Road as they need to reflect the houses on Ipswich road and increase the spaces between properties as they move away from the centre of the Village. The smallest garden must be bigger than the biggest garden on the exit on Ipswich Road.

Infill

When a building is categorised as an infill it must reflect all the requirements of Density, beautification and rurality. It must not impinge upon or alter long vistas and views which are defining aspects of the county as identified by the South Norfolk Landscape Assessment. comply with rurality

Site specific requirements

Site 1 GNLP 0516 not including site 18

Policies and Issues related to this site

Cordon Sanitaire (400 metres) – no building within the limits of the cordon sanitaire

Heritage Views maintained

Heritage sites protected and remain

Views and Vistas maintained. In particular views from the Norwich Road across to the A140, views to the church, views from the church.

Footpath 3 – is a green walk (path) and should remain a green walk (path)

Rurality

Flooding of the Norwich Road – flooding regularly occurs The site must not exacerbate this issue

Providing all aspects can be resolved this is the principal preferred site. It is expected that this site could deliver in excess of 40 homes.

Yes 8 No or undecided 1

Adding site 18 to site 1

Yes 2 No or undecided 7

Site 1 is proposed exclusively and does not include additional areas.

Site 2 GNLP 0361

Policies and Issues related to this site

Views out of the Village

Views into the Village

Biodiversity

Site lines to the Church – this is a particularly important issue for the current residents

Flooding on Ipswich road - flooding regularly occurs The site must not exacerbate this issue

Transport. Cars must not reverse out.

Parking. No parking nose to tail.

Rurality – particularly in relation to garden sizes around the site.

NP Density requirements

Beautification – views. No parking in front of houses.

The initial site is brownfield – the potential extended site is green field.

Clarification need regarding the current status of the garage

Positives

It could improve the current locality if there were a strong emphasis on beautification (including increasing biodiversity throughout the site).

Negatives

Must not impede views of the church tower as you approach the village. The first buildings on Ipswich Road should therefore be bungalows

Nose to tail parking cannot be permitted

Parking in front of buildings this not supported through beautification

The current proposals are not acceptable. It does not conform to rurality, parking, density requirements.

Current proposed densities are unacceptable.

Providing all aspects can be resolved then this is a preferred site. It is expected that this site could deliver around 15 homes.

Brown field element only

Yes 9 No 0

Enlarged site including the green field area with densities as currently presented by Tricker and Last

Yes 0 No 9

This site was subsequently withdrawn by the developer.

Site 3 (West of Ipswich Road GNLP 0390)

Policies and Issues related to this site

Views out of the Village

Views into the Village

Biodiversity

Site lines to the Church – this is a particularly important issue for the current residents
Rurality – particularly in relation to garden sizes around the site, entry
NP Density requirements
Beautification - views
Listed buildings
Rich in biodiversity
Outside of the development area
This is the least popular site.
Development must be linea.

Vote: Yes 0 No 9
This site is rejected.

Site 4 (East side of Ipswich Road (GNLP 0498))

Policies and Issues related to this site

Views out of the Village
Views into the Village
Biodiversity
Site lines to the Church – this is a particularly important issue for the current residents
Rurality – particularly in relation to garden sizes around the site, entry
NP Density requirements
Beautification - views
Listed buildings
Rich in biodiversity
Heritage site
Outside of the development area
Entry to the site must not be via Ipswich Road
Development must be linea.

Positives

If entry to the site were via Common Road then it would not impact upon traffic – there would need to be biodiversity compensation, however the entrance will need to be beyond the wooded area at the entrance of Common Road.

The small area of the site

Vote: Yes 5 No 4

The enlarged site only on the basis that entry to the site is via Common Road and only if site 1 and 2 are unable to deliver to expectation.

Vote: Yes 5 No 4

This site is accepted only on the basis that sites 1 and 2 do not deliver the required number of homes. Should the number of homes be achieved through the delivery of sites 1 and 2 then this site is rejected.

This site is rejected on the basis that current preferred sites can deliver the expectations.

Hierarchy of sites

1. site 1
2. Site 2
3. Site 4 – only if sites 1 and 2 fail to achieve the desired number of homes allocated to the parish.

POLICY DR20: Allocation

The Neighbourhood Plan allocates the 5.33-hectare site SN0516 (figure X) for residential development, to accommodate up to 25 new homes of mixed type, tenure and size. The mix should include

- Starter homes.
- Affordable Homes (minimum requirement as stated in the Local Plan)
- Custom built homes.
- Lifetime homes.

In addition to all other development policies, the site requires the following:

- a. The delivery of a coordinated approach to design, layout, landscaping, infrastructure provision across the site through a site masterplan.
- b. A detailed heritage statement that identifies any impacts on heritage assets (as identified in policy X). The area contains pre-Roman and Roman archaeology.
- c. Preservation of the rural nature of the site through the provision of wildlife corridors.
- d. Protection and enhancement of footpath 3 (figure X).
- e. The protection and enhancement of a landscape belt along the north, eastern and western boundary of the site (figure X).
- f. Retention and enhancement of existing trees and hedgerows.

Where possible, the developer of the site is encouraged to incorporate sustainable and/or innovative design and construction principles to achieve net zero carbon emissions during construction and realise sustainability improvements over and above those set by Building Regulations which will be particularly encouraged.

Evidence to support DR 20

Strategic Environmental Assessment (SEA) for the Dickleburgh and Rushall Neighbourhood Plan Environmental Report Dickleburgh and Rushall Parish Council January 2023³
Appendix documentation

³ https://www.dickleburghandrushallpc.org.uk/_7iles/ugd/efa034_c0f187db07364759ad6907d490091152.pdf

Appendix 3

Letter from Jackie Patching to the PC regarding the change in direction of the December SEA December 2024

From: Jackie Patching

Date: 5 December 2024 at 18:21:32 GMT

To: clerkdrpc@yahoo.co.uk

Subject: Parish Council Meeting Question 9th December 2024

Dear Ann,

I believe that it is permissible to ask for a question to be raised by a resident at the Parish Council meeting of the 9th December 2024. I have noted that the concerns around the revised SEA is an item on the agenda. I would like the following question to be put to the Parish Council for the benefit of the parish residents and would be grateful if you could do this on my behalf.

Given the Neighbourhood Plan (NP) is a procedure designed to enable parishioners a degree of control over their local environment, in particular housing development, and given also that, via the NP, the village are empowered to designate preferred sites where development could best be delivered, I would like to ask why three of the four preferred sites, properly assessed, supported and communicated to the parish residents through the NP since 2018, have recently been removed, leaving only one recommended site to be submitted to Broadland and South Norfolk District Council (BSNDC). The risk of flood, increased traffic on Norwich Road and overspill of sewage in this area was acknowledged from an early stage and is addressed in the original SEA and the October 2024 SEA. This was in fact the subject of a Diss Mercury and EDP story recording objections to the original 22 houses in 2018. (Please note if referring to the SEA documents there are errors in the representation of the numbered Options and locations). The SEA reports suggest that development may need to be directed towards the southern end of the site as a result. Furthermore, a higher number of houses may now be imposed upon us (as in the case of Scole) leading to the possibility that this site may not, for the reasons stated above, be viable for the full number of houses required.

I am asking the The Parish Council, as the body responsible for the NP, to reinstate the three missing sites preferred by the residents so that any additional housing needs can be accommodated on those preferred sites, one being a prime brownfield site. The alternative may be that a site not consulted on nor preferred by the residents, may be imposed on the village by BSNDC. There are a total of 22 sites which could potentially be nominated by them, inside or outside the settlement boundary.

If there is a reason why reinstatement of the additional three sites is not possible, a full explanation of the reasons should be presented to the residents of Dickleburgh so that they are aware of the issues. At this moment in time they are of the impression that the NP has allocated four agreed sites.

**Kind regards,
Jackie Patching**

Appendix 4a

Response from the PC to Jackie Patching on the change of direction of the December SEA December 2024

Dear Jackie,

Your email was discussed at the PC meeting on the 9th December 2024 and I have been asked to make the following response.

Every SEA should follow the same format for all sites that come forward for consideration, that is: (i) identify sustainability objectives, (ii) identify targets (locally determined), (iii) describe environmental baseline of all sites, (iv) predict & evaluate impacts, (v) mitigate impacts of all sites.

The current SEA is endeavouring to do this.

Your specific points appear to be:

(a) why have three of the four sites been removed - they have not been removed by the NP team, they have not been removed by the SEA. I refer you to the new SEA 3.2. You will see on Table 3.1 all sites are identified. In line with the procedures and purpose of SEA's, the sites within the Dickleburgh area have been grouped into Options see fig. 3.4. (this strategy has been utilised because of the high number of sites). You will be aware that some sites have been immediately dismissed by the SEA for a variety of reasons such as – sites having already been developed, sites withdrawn by landowners, sites that do not conform to the D & R NP policies.

The original four sites, as identified by the NP Team fall within Options 1 & 2 (fig. 3.4)

(b) the misrepresentation of terminology – I believe your concern is that the NP plan through the HELAA process identified 4 sites which were referenced as options 1- 4.

The new draft SEA has used the same terminology to group all sites geographically into four Options. This should be viewed as a prior step to the HELAA process, assisting the NP Team in identifying the preferred site. It is unfortunate that the same term has been used in both documents for different purposes. AECOM have been made aware of this confusion, so that moving forward as all the documents merge there can be more clarity.

(c) the possibility of an increased housing allocation to the Parish - this is beyond the control of the Parish Council and the current NP team. If new targets are set for Norfolk by the Government, it will be for the District or County Council to decide where they go. It will be beyond the control of Parish Councils. Where the Parish Council can have an impact is through the delivery of the NP, it is therefore essential that we deliver our NP as speedily as possible.

I trust this clarifies the question addressed to the Parish Council.

With kind regards,

Ann E. Baker

Ann Baker



Statement Appendix J & A Patching, R. Walkley, L.Liggins.

Appendix 4b

South Norfolk Council email no planning weight afforded to RASs

From: Richard Squires
Date: 7 April 2025 at 16:13:50 BST
To: Jackie Patching
Cc: Adam Banham
Subject: RE: Guidance please

Dear Jackie,

In answer to your first query, yes – if and when it is adopted (assuming it goes to a referendum and receives a positive vote from the electorate) then the Neighbourhood Plan will become part of the statutory development plan and will be used, alongside our Local Plan, in making planning decisions within the parish.

The Neighbourhood Plan allocates one site for development – the site to the west of Norwich Road. If adopted, that site will meet the housing requirement figure for Dickleburgh for the current Local Plan period (i.e. to 2038).

The other sites that were assessed within the Neighbourhood Plan SEA would not be given any particular status as part of the proposed Neighbourhood Plan, as they do not form a Neighbourhood Plan policy. However, in the future (and outside of the Neighbourhood Plan process, unless the parish council wishes to review the Neighbourhood Plan and allocate site[s] once again), landowners of these sites may still wish to promote them for consideration as part of a Local Plan review undertaken by South Norfolk Council, which local authorities are obliged to carry out no later than every five years. During a Local Plan review, the Council will undertake an assessment of all sites promoted for consideration to understand which sites may be suitable for allocation to meet the Government's new housing targets.

I hope this helps.

Kind regards,

Richard

Richard Squires
Senior Community Planning Officer

Appendix 5

Email from Chair to Steering Group 29th July 2024

From: Chair of PC
Date: 29 July 2024 at 00:28:21 BST
To: SG (redacted email addresses)
Subject: [SEA](#)

I have been speaking to Cheryl. It appears that because the policies have been adapted, merged or dropped we need a review of the SEA. This will not affect the work of Rachel or the timescale of the NP. It will simply strengthen the NP. The bid to Locality has been made. There is nothing we need to do, like the last SEA I may get questions asked which I will deal with. If I need to liaise I will.

Regards

Andrew

Appendix 6

Email from Chair to Steering Group 30th July 2024

From: Chair of Parish Council Steering Group

Date: 30 July 2024 at 16:04:08 BST

To: Steering Group

Subject: SEA

Dear all

We have had our application for technical support accepted. From here then the SEA will be written / reviewed in light of the changed policies.

It is my understanding that this will strengthen the NP further and not require any additional work from the team.

Kindest regards

Appendix 7a

Jackie Patching resignation letter

From: Jackie Patching

Date: 20 November 2024 at 09:52:05 GMT

To Chair of PC, Clerk DRPC, SG members (redacted email addresses)

Subject: Resignation from the Neighbourhood Plan Steering Group

TO:

A. Goodman, Chairman of the Neighbourhood Plan Steering Group & Chairman of the Parish Council

Clerk to the Parish Council - A. Baker

All Parish Councillors

It is with genuine regret, and after a long thoughtful process, that I have decided to resign from the Neighbourhood Plan Steering Group. My resignation is addressed to all members of the Parish Council being the body responsible for the Neighbourhood Plan.

It has become increasingly apparent in recent months that my requests for information, my questions, my suggestions and my recommendations, all made as a long and loyal member of the Neighbourhood Plan Steering Group, have not been welcome nor met with a positive response and I can't go on like this.

I have been on the Steering Group since 2017 and my contributions have always been made for the benefit of the village of which I have been a resident for 28 years.

The Steering Group has very recently been faced with some unexpected and incredibly important concerns, which I, along with others, have been working long hours on trying to evaluate and resolve. The anomalies presented by the October 2024 version of the SEA, a document which we were only made aware of 4 weeks ago, but had been in existence since at least July 2024, was being worked on in a 'core' group with the blessing of the wider Steering Group. It has taken this group 4 weeks of intense effort to get to where we are now and the priority issues have still not been addressed to my satisfaction.

The unexplained disappearance of three of the four Steering Group preferred development sites, those supported by the excellent analysis created by Allan Eavis, the residents in the open days and the sites preferred by the first AECOM document of January 2023, is of major concern. This appears to have thrown all sites put forward in the 'call for sites' back into the mix at a crucial point in the current volatile planning environment, to which recent changes in Scolle testify.

It has become evident that there is resistance to my efforts, for whatever reason, and I find my presence on the Steering Group being regarded as troublesome. I am no longer valued for my contribution and am not being allowed to do the job that I joined the Steering Group to fulfil for the benefit of the village and its residents.

I am confident that in all the time I have been a member of the Steering Group my conduct has been of the highest standard and has always been carried out in accordance with the Nolan Principles.

I request that my name be removed from the Plan going forward as I am no longer able to endorse it and for this reason I have copied in the Consultant working with us to submit the final documents to South Norfolk for examination. I would like to acknowledge her help and guidance and thank her for this.

Finally, in recent days a vote was proposed on one of the errors spotted in the Plan. I would urge the individuals who responded to the vote to acquaint themselves with Section s25 subsection (2) of the Localism Act 2011 and ask themselves whether this vote and their response to it is valid.

With apologies to the Parishioners and a heavy heart at this late stage of the Plan, when it could so easily have been over the line now, I tender my resignation with immediate effect.

As I can no longer endorse the Plan and the SEA which appear to be the final documents going forward, I would request that my name be removed from these documents and perhaps Rachel can ensure that this request is carried out.

Mrs. Jacqueline Patching.

Appendix 7b

Resignation Letter A.Patching November 2024

----- Forwarded Message -----

From: Alan Patching

Date: 20/11/2024 17:58:19

Subject: Neighbourhood Plan

To: Chair of PC, Parish Council and SG (redacted email addresses)

I have witnessed today's events with great sadness and concern. Two long-standing and committed steering group members, Jackie and Matt, have felt the need to resign.

On top of the 7 very long years on the NP steering group, I have spent great swathes of recent weeks trying to help sort the numerous errors and areas of major concern in the SEA report. Despite the efforts of the four person 'SEA Steering Group', progress has been prevented by your refusal to acknowledge many of the concerns and corrections raised by that small group. Additionally, you have excluded some of those members from further discussions in recent days. You have effectively appointed yourself as sole arbiter rather than the final arbiter. It is clear that the final response will be by your hand and not by that of the committee.

At the outset, the residents were free to vote on their site preferences. The most favoured 4 sites happened to coincide with the best 4 sites that came top in the HEELA process, skilfully undertaken by Allan Eavis.

The new SEA report has removed three of these sites. You have turned down the many suggestions made for us to approach the AECOM team to ask for facts and clarification. A Zoom meeting with AECOM could have sorted this within minutes and all members of the 'SEA steering group' suggested this but you blocked this. Why?

If you don't know the answers, why don't you want to know the answers? If you do know the answers why won't you tell us?

If you're not prepared to work with the committee that was entrusted by the Parish Council to undertake the NP process and answer these vital questions how do you propose to answer the questions of the residents when they ask? We have a duty to be asking on their behalf.

Where is site 3 now? Why has it been removed? Only a few weeks ago we were in touch with the landowner about seeking permission to allocate his site as a Local Green Space. If the site has been 'withdrawn' why weren't the full steering group informed? Where is site 4 now? Why has it been removed? The Chenery site is still mired in confusion.

In the summer you informed the group that the new SEA report was underway and that the steering group was unlikely to need to be involved but that we would be consulted if necessary. What part of losing 75% of the preferred sites did you feel wasn't worth mentioning to the committee?

If SNDC now rejects the NP's preferred site, how can you be so dismissive about our preferred second, third and fourth choices being, allegedly, off the table?

You stated in the meeting on the 7th of November 2024 that the new SEA report was '80% similar to the first report'. It is far from it.

If the observations and relevant questions are being ignored then people like me are being denied the opportunity to undertake the job to which the village entrusted us. The entire steering group is therefore not functioning as it should.

Across seven years, like my wife Jackie, I have attended every single meeting bar one; every Zoom session, every Open Day, undertaken the process of collating the Reg 14 responses and countless more tasks and done everything asked of me without question. I have done hedge row surveys, measured trees, taken hundreds of photographs and helped Jackie with the laborious and time-consuming task of taking bat readings across the Parish. Additionally, I have secured grant money for a tree nursery, planted and distributed trees and worked on the Commons Committee. Since I am being prevented from fulfilling the task to the best of my ability and I am clearly now unwelcome, it is with regret that I have been left with no option but to resign from the steering group with immediate effect.

Rachel (whose knowledge and guidance helped save the process when time seemed to be running out and who I would like to thank on behalf of the parish for her patience and guidance) should remove all reference to me in the Neighbourhood Plan.

I think that three letters of resignation in a 24 hour period of the longest serving steering group members tells its own story.

These many questions I ask of you here are rhetorical. It is too late now for any explanations to make a difference to my decision.

Alan Patching

PS I am copying in the members of the Parish Council since the Plan is ultimately their responsibility and I was acting on their behalf whilst on the committee. I hope the PC will scrutinise the new SEA report on behalf of myself and the other parishioners of the Parish. My frustration as a committee member is as nothing compared to my concerns as a resident as the bulldozers wait at the gates, especially given the frightening developments in Scole.

I have taken steps to return all Open Day 1 and Open Day 2 posters to the Parish Clerk along with all other property of the PC including the bat recording equipment and tree nursery equipment plus the originals of the Reg 14 response documents from residents.

Appendix 8

Email from chair of SG to SG members regarding SEA review

From: chair of PC

Date: 8 October 2024 at 18:40:45 BST

To: SG members

Dear all,

Thank you for the dedicated, unpaid work you have put in over the years to deliver a comprehensive Neighbourhood Plan. Everyone has played their part and each of us has brought a unique perspective to this parish wide document at different stages of its development / evolution. The next step is for the SEA to be reviewed in the light of the finished NP to see if the SEA needs updating or changing in any way. I am pleased to report that we have been told officially today that the funding from Locality has been allocated and the SEA review can now take place.

Kindest regards and thanks to all.

Andrew

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

Environmental Report (submission version)

October 2024

Delivering a better world

Quality information

Prepared by	Checked by	Verified by	Approved by
CB: Associate Director	CB: Associate Director		
OM: Graduate Environmental Planner			

Revision History

Revision	Revision date	Details	Name	Position
V1	October 2024	First draft for QB review	AG / RL	NP Steering Group / Planning consultant

Prepared for:
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Table of Contents

Quality information	2
Revision History	3
Prepared for:	3
Prepared by:	3
1. Non-Technical Summary (NTS)	1
1. Introduction	1
2. Introduction	2
2. Background	2
2. What is the DRNP seeking to achieve?	3
3. The scope of the SEA	5
3. What has plan-making/ SEA involved up to this point?	10
4. Introduction	10
2. Establishing reasonable alternatives	11
3. Assessing reasonable alternatives	16
4. Developing the preferred approach	25
4. What are the SEA findings at this stage?	26
5. Introduction	26
2. Methodology	26
3. Proposed DRNP policies	27
4. Overview of the plan	27
5. Appraisal of the plan	28
6. Conclusions and recommendations	34
5. Next steps	36
7. Plan finalisation	36
2. Monitoring	36
A.– Regulatory requirements	37
B.- Scoping information	38

1. Non-Technical Summary (NTS)

1. Introduction

1.1.1.

2. Introduction

2. Background

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

¹ The D&RNP was subject to informal screening by South Norfolk Council in 2021 and Scoping consultation in 2022 sought the wider opinions of statutory consultees.

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

³ See **Appendix A** for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2. What is the DRNP seeking to achieve?

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

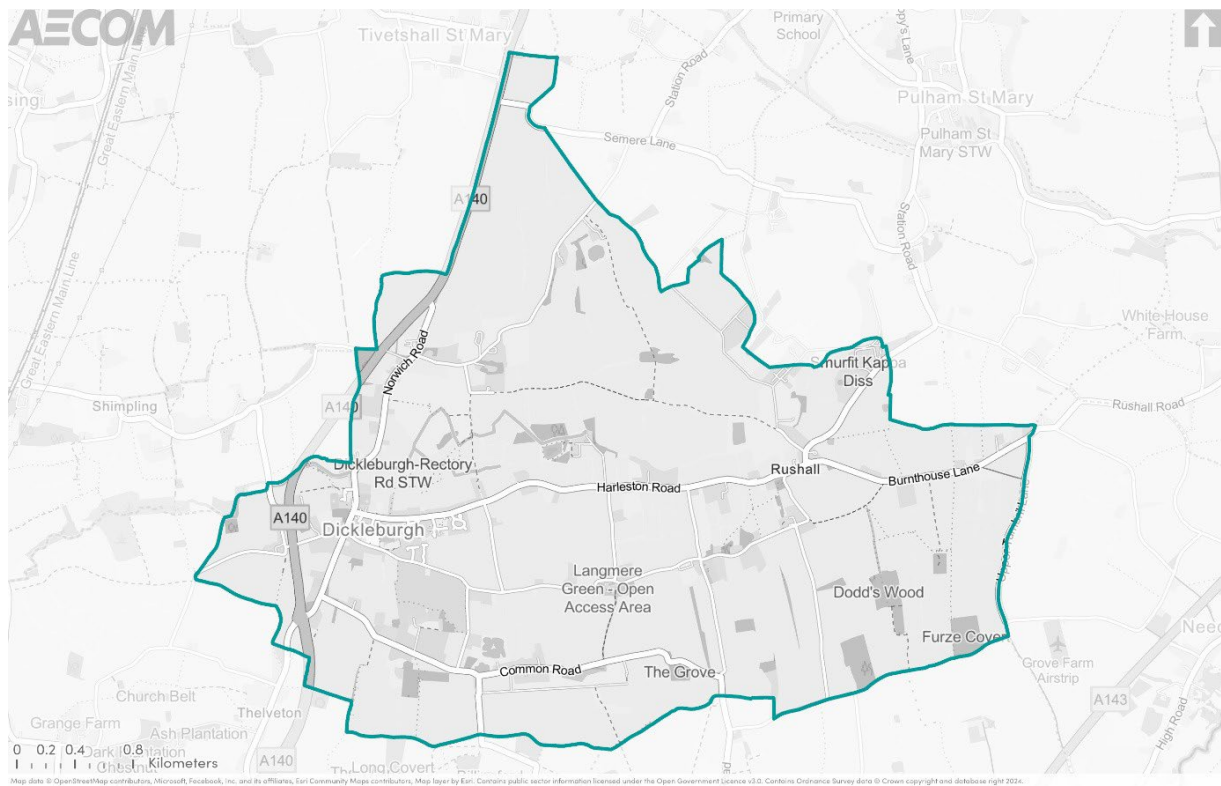


Figure 2.1: The DRNP neighbourhood area

Strategic context of the GNLP

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

Vision and objectives of the DRNP

- 2.1.13. The following vision has been established for the DRNP:

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

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

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

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

Housing

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

Transport

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

Environment and Biodiversity

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

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

3. The scope of the SEA

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

Table 2.1: Summary SEA framework for the DRNP

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

2.1.2. The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.⁴ As such, these authorities were consulted in March 2022. No response was

⁴ These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

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

Table 2.2: Scoping consultation responses

Consultation response

How the response was considered and addressed

Historic England

We would refer you to the advice in Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment, which can be found [here](#). This advice sets out the historic environment factors which need to be considered during the Strategic Environmental Assessment or Sustainability Appraisal process, and our recommendations for information you should include.

Comment noted. The Advice Note is considered as part of the plans and policies review in scoping and will be considered as appropriate in subsequent appraisal stages. No changes required.

We would also refer you to Historic England Advice Note 3: Site Allocations and Local Plans. This advice note sets out what we consider to be a robust process for assessing the potential impact of site allocations on any relevant heritage assets. In particular we would highlight the Site Selection Methodology set out on Page 5. This is similar to the methodology used to assess potential impacts on the setting of heritage assets (Good Practice Advice 3) but is focused specifically on the site allocation process and is therefore a more appropriate methodology to employ in this context.

As above.

We would expect a proportionate assessment based on this methodology to be undertaken for any site allocation where there was a potential impact, either positive or negative, on a heritage asset, and the SEA consequently to advise on how any harm should be minimised or mitigated. Advice Note 3 can be found [here](#).

Comment noted. Every effort will be made to undertake a proportionate assessment and advise on how any potential negative effects should be avoided, minimised, or mitigated. No changes required.

Historic England strongly advises that the conservation and archaeological staff of the relevant local planning authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), which should be consulted as part of the SEA process. In addition, they will be able to advise how any site allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Comment noted. It is the intention to develop the DRNP and SEA in consultation with the local planning authority. No changes required.

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

Natural England

Natural England has no specific comments to make on this neighbourhood plan SEA scoping.

Comment noted. No changes required.

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

4. Introduction

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

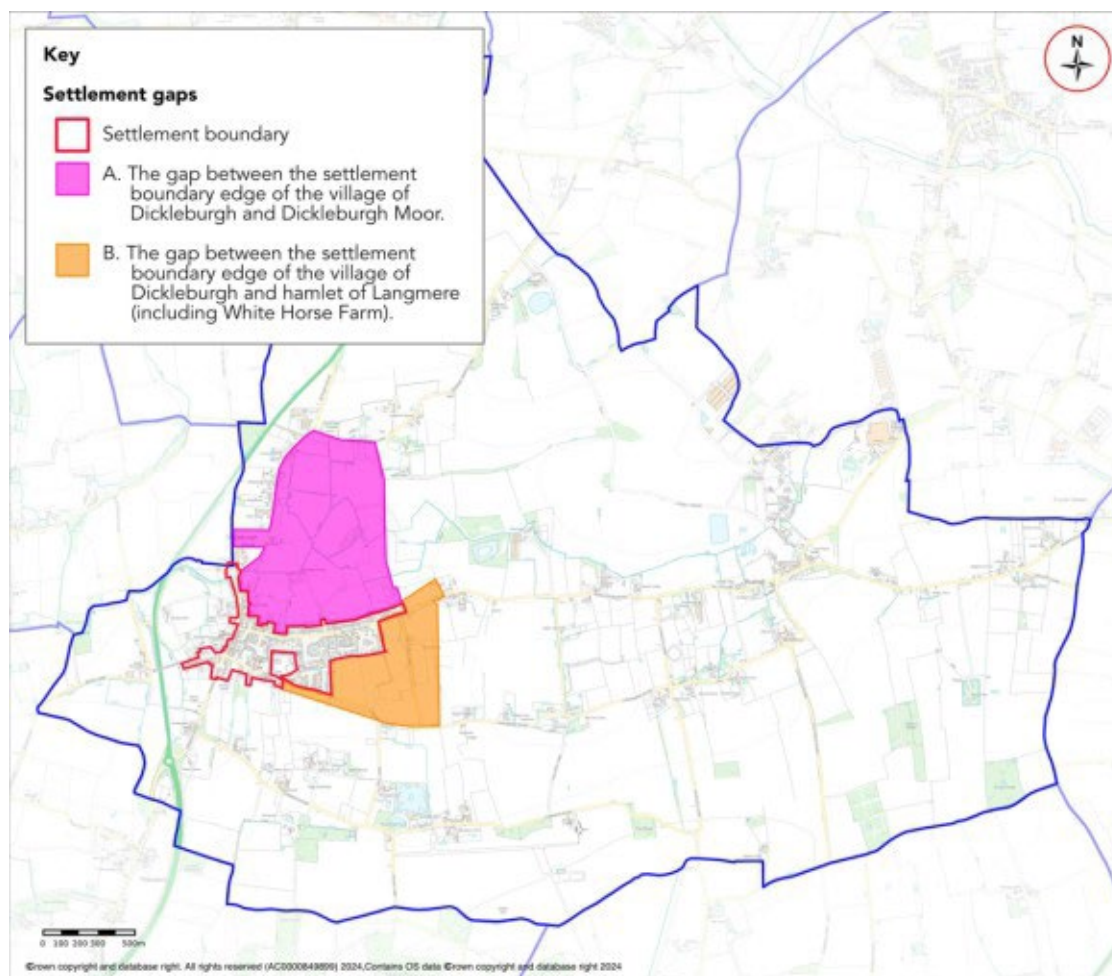
2. Establishing reasonable alternatives

- 3.3.4. In line with the regulations, there is a need to present “*an outline of the reasons for selecting the alternatives dealt with*”.⁵ Specifically, there is a need to explain the strategic parameters that have a bearing on the establishment of options (in relation to the level and distribution of growth) and the work that has been undertaken to date to examine site options (i.e., sites potentially in contention for allocation in the DRNP). These parameters are then drawn together in order to arrive at ‘reasonable alternatives’.

Strategic parameters

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

⁵ Schedule 2(8) of the SEA Regulations

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

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

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

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

Figure 3.3: Proposed Cordon Sanitaire around Netheridge and Longford Sewage Works (taken from the DRNP)



Site options

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

Table 3.1 Sites identified within the neighbourhood area

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

Establishing the options

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

future growth. Additionally, as Site numbers 3 and 19 cannot be confirmed as available over the plan period, they are not deemed reasonable alternatives at this stage.

3.3.11. Also of note, no suitable access to Site number N1 can be identified at this stage, and on this basis, the site is also deemed not to be a 'reasonable' option for the purposes of SEA.

3.3.12. Whilst additional sites (Site numbers 8, 10, 11, 13, and 14) are identified as falling within the proposed settlement gap (B), these sites are not discounted at this stage, recognising that none in isolation would fully erode the proposed gap.

3.3.13. Of the long list of 22 sites, 11 are therefore progressed as potentially in contention for allocation in the DRNP – see Figure 3.4 which identifies 'unreasonable' site options in red, and 'reasonable' site options in green.

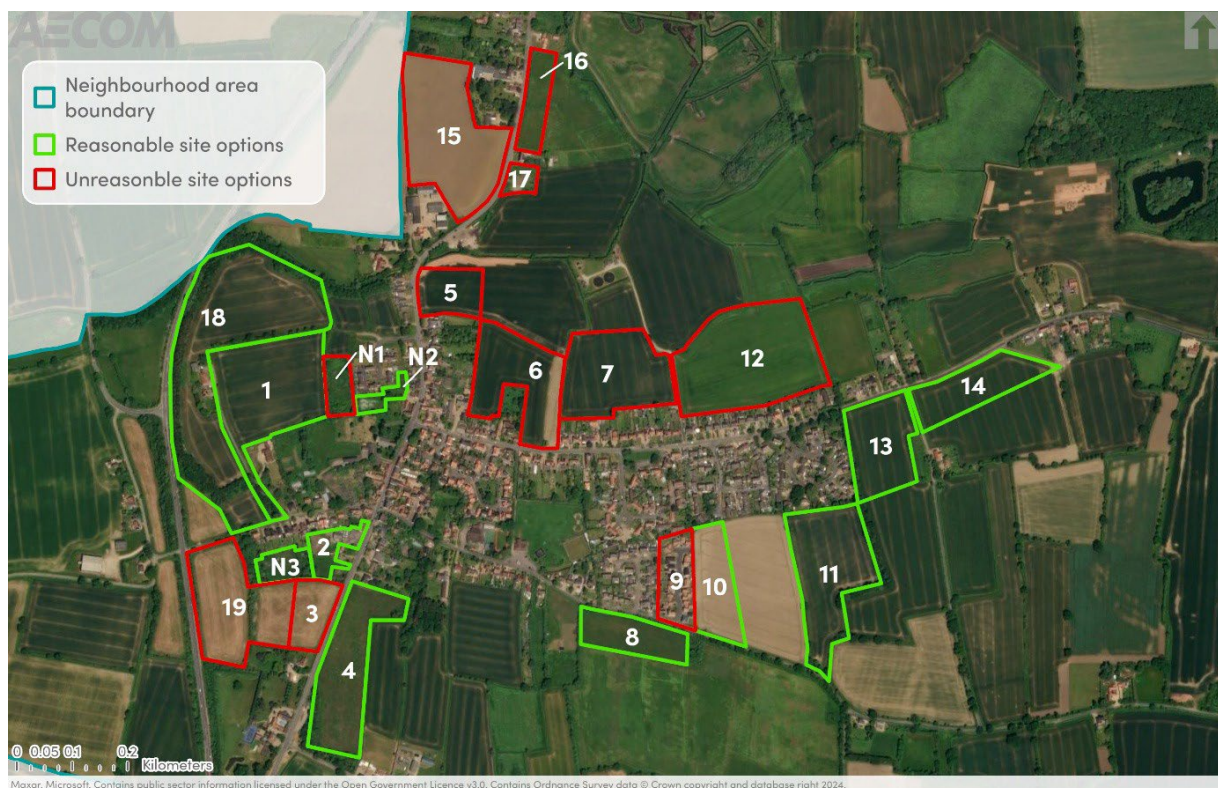


Figure 3.4: The DRNP site options

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

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

- **Option 4:** Development of one or more sites in the south-east of Dickleburgh village (with the choice of Site numbers 8, 10, and 11).

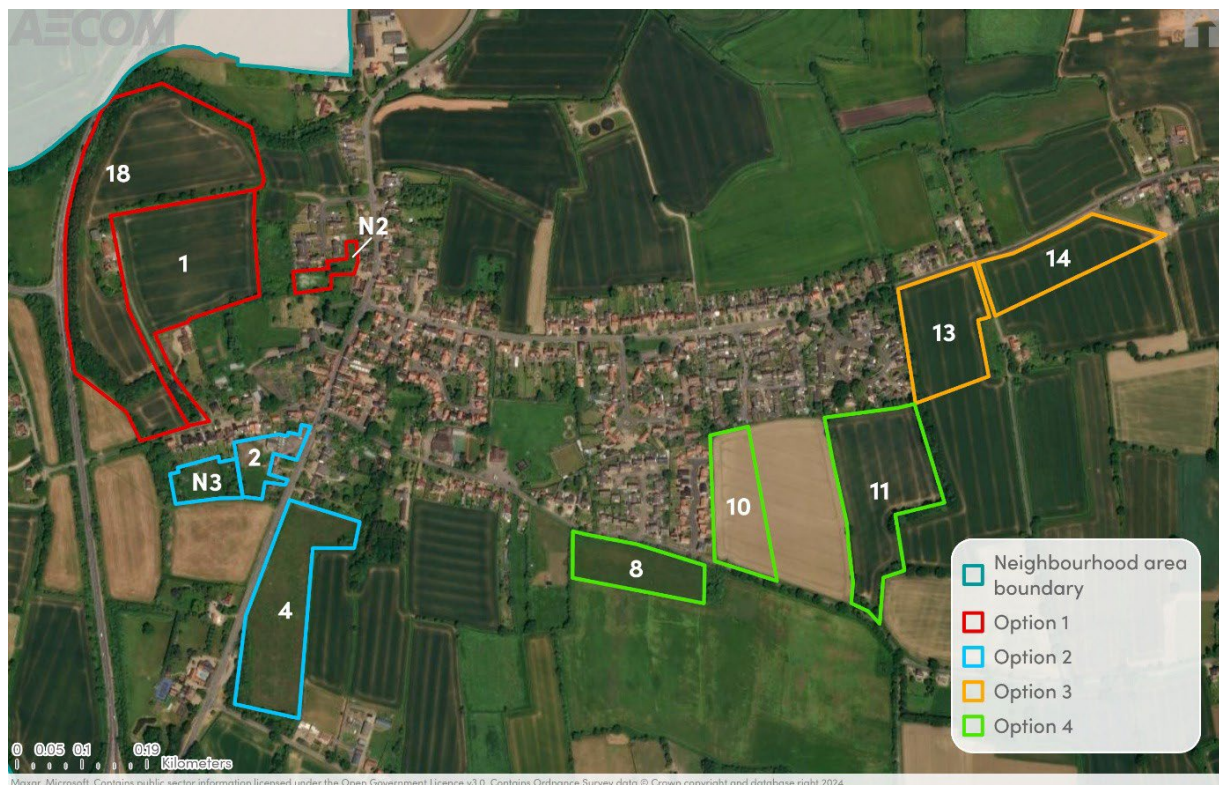


Figure 3.5: The reasonable alternatives options

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

3. Assessing reasonable alternatives

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

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

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

- 3.3.19. Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best.
- 3.3.20. Finally, it is important to note that effects are predicted considering the criteria presented within Regulations.⁶ So, for example, account is taken of the duration, frequency, and reversibility of effects.
- 3.3.21. To reiterate, the following 4 options are being assessed (as seen Figure 3.5):
- **Option 1:** Development of one or more sites in the north-west of Dickleburgh village (with the choice of Site numbers 1, 18, and N2).
 - **Option 2:** Development of one or more sites in the south-west of Dickleburgh village (with the choice of Site numbers 2, 3, 4, and N3).
 - **Option 3:** Development of one or more sites in the east of Dickleburgh village (with the choice of Site numbers 13 and 14).
 - **Option 4:** Development of one or more sites in the south-east of Dickleburgh village (with the choice of Site numbers 8, 10, and 11).

⁶ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 20004.

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

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

Biodiversity and geodiversity

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

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

- 3.3.10. The entire neighbourhood area is designated a priority area for Country Stewardship (CS) measures addressing Lapwing habitat issues. In this respect, all options have the potential to disturb this habitat.
- 3.3.11. Dickleburgh Moor is home to numerous migrant wading birds, including the lapwing (*vanellus vanellus*), as well as several birds of prey, and the periphery of the moor is one of the few nesting sites of the endangered turtle dove (*Streptopelia turtur*) in the upper Waveney valley catchment. The moor is also home to numerous mammals, including water voles (*Arvicola amphibius*), Eurasian otter (*Lutra lutra*) and water shrews (*Neomys fodiens*), as well as several amphibian species. Moreover, Dickleburgh Moor is home to the Suffolk Punch, which is the oldest English breed of working horse, and is now a critically endangered species.⁷ In terms of plant species, the moor provides a habitat for the locally scarce Nodding bur marigold (*Bidens cernua* L.) and the nationally scarce Pedunculate club rush (*Bolboschoenus laticarpus*).
- 3.3.12. As Option 1 is in closest proximity to the moor, it has the greatest potential to disturb the aforementioned species. However, given that the full capacity of Option 1 is unlikely to be delivered as it exceeds the required housing need, this could be mitigated to some degree by directing development to the southern half of the site.
- 3.3.13. Overall, Option 1 is ranked least favourably due to the presence of deciduous woodland, multiple habitat types, and its proximity to Dickleburgh Moor, increasing its vulnerability to disturbance. Nonetheless, significant negative effects are not anticipated, as these constraints could largely be managed by directing development to the southern site area. Option 2 ranks less favourably than Options 3 and 4 due to its traditional orchard BAP Priority Habitat, though impacts could be minimized by avoiding development on or near this habitat. No significant effects are therefore anticipated under any option.

Climate change

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

⁷ The Suffolk Punch Trust (no date): 'Home', [online] available to access via [this link](#)

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

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

Landscape

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

reduced visual impact on the village setting. Option 2 includes primarily smaller sites but would extend the settlement boundary southward if site 4 is developed. Option 3 consists of smaller sites, minimally extending the settlement boundary compared to Option 2, thus having a lesser impact on views. Option 4 extends the settlement boundary eastward, which is relatively natural given the existing dwellings nearby. However, Options 2, 3, and 4 are generally at a similar elevation to Dickleburgh village to the north, making them potentially more prominent in the landscape and thus more likely to impact the village setting.

- 3.3.23. Option 1 is in closest proximity to Dickleburgh Moor, which is at a lower elevation than the rest of the neighbourhood area. In this respect, these options have the potential to impact the setting of the moor. The northern part of Option 1 (site 18) is most likely to impact views onto the moor, given that it projects the furthest north and is relatively exposed to the wider landscape. Importantly, the DRNP states that all views onto and from the moor must be protected, and in this respect, Option 1 may not meet this requirement. However, given that the full capacity of Option 1 is unlikely to be delivered as it exceeds the required housing need, this could be mitigated to some degree by directing development to the southern half of the site.
- 3.3.24. Overall, Option 1 is ranked least favourably due to its size, resulting in the greatest loss of greenfield land, and its proximity to Dickleburgh Moor, leading to **significant negative effects** (pre-mitigation). However, it is noted that this could be mitigated to some degree by only developing the southern half of the site. Due to this, the loss of greenfield land is likely to be limited to only part of the site. Option 2 is ranked the least favourable after this, due to the extension of the settlement boundary to the south in a more unnatural way than Options 3 or 4. Option 3 is considered the most favourable as development through this option would be the most adjacent to the existing settlement, therefore impacting on views and landscape the least. No significant effects are anticipated under Options 2, 3, or 4.

Historic environment

- 3.3.25. None of the options contain designated heritage assets; however, site N2 of Option 1 is located directly adjacent and in proximity to a number of Grade 2 listed buildings. Moreover, site N2 is located in close proximity to Grade I listed building 'Church of All Saints'. Further, site 2 of Option 2 is located south of a large cluster of listed buildings along The Street and is in particularly close proximity to Grade II listed buildings 'East Bank' and 'Housing Opposite and Immediately East of East Bank'. In addition, Site 4, also Option 2, is located adjacent to Grade II listed building 'Manor Farmhouse' and Grade II* listed building, 'Manor House'. In this respect, Options 2 has the greatest potential to impact the setting of listed buildings in the neighbourhood area.
- 3.3.26. Option 1 (site N2) is located within Dickleburgh Conservation Area, and site 1 is located adjacent to the area, to the northwest. Development within the conservation area and directly adjacent to the border of the area has the potential to impact negatively on historic assets. Site 2 of Option 3 is located adjacent to the south of the Dickleburgh Conservation Area border.

- 3.3.27. Dickleburgh Moor also has historic value, and recently an early Bronze Age trackway, believed to date back to between 1775 and 1623BC, was discovered on the moor. The trackway is of national significance as it represents the second oldest Bronze Age wooden structure in Norfolk, and the only trackway of this period in England. There is potential for the trackway to be granted scheduled monument status, and therefore any development that will lead to disturbance of the land and its hydrology may not be permitted. Whilst it cannot be confirmed at this stage whether development at Option 1 would cause disturbance, this option is in closest proximity to Dickleburgh Moor, and in this respect, has the greatest potential to lead to disturbance.
- 3.3.28. Overall, Option 1 is considered to be ranked least favourably as site N2 is located within the Dickleburgh Conservation Area, and adjacent to a number of listed buildings. Therefore, this option is considered to have the potential for **significant negative effects**. However, it is noted that the full capacity of Option 1 is unlikely to be delivered, as it exceeds the required housing need. In this respect, development could be directed to the part of the site that will have the lowest impact on the historic environment. Whilst the proximity of Option 1 to Dickleburgh Moor is recognised, uncertainty is noted regarding significant effects as further studies will need to be undertaken to determine whether development of this option will result in disturbance to the archaeological assets found in the moor. Option 2 is considered to be the next least favourable, due to the location adjacent to the conservation area, and multiple listed buildings – and due to this, is considered likely to lead to **significant negative effects**. Options 3 and 4 are not considered to be constrained with regard to historic environment and are therefore ranked equally most favourable, with no significant effects anticipated..

Land, soil, and water resources

- 3.3.29. In terms of the Agricultural Land Classification (ALC), all options are underlain by Grade 3 (Good to Moderate) agricultural land. However, in the absence of a detailed assessment at this location, it is currently not possible to determine whether this land is Grade 3a (i.e. higher quality) or Grade 3b (poorer quality). In terms of Best and Most Versatile (BMV)⁸, all options have a Moderate (20 to 60% area BMV) likelihood of being underlain by BMV agricultural land.
- 3.3.30. Concerning water resources, the neighbourhood area falls within the 'Norfolk Rural South' Water Resource Zone (WRZ). This WRZ is projected to experience a 9% increase in water demand between 2017 and 2045 due to population growth. However, Anglian Water's Water Resource Management Plan (WRMP) indicates that this WRZ has no climate change vulnerability, including in cases of severe drought, up to 2045.
- 3.3.31. The neighborhood area lies within the Waveney Operational Catchment, specifically in the catchment of the Dickleburgh Stream Water Body. Currently, the stream's water body is classified as having a 'moderate ecological status.' Regarding physio-chemical quality, the Dickleburgh Stream scored 'poor' for ammonia and phosphate levels, often stemming from agricultural practices (e.g., fertiliser use) and household wastewater.

⁸ BMV land is defined as land which falls in ALC grades 1 to 3a.

Consequently, managing diffuse pollution at new developments will be essential to prevent worsening the ecological status of Dickleburgh Stream via wastewater runoff. Option 1 is most likely to impact Dickleburgh Stream, as it lies adjacent to its northern boundary.

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

Community wellbeing

- 3.3.34. While all options will meet the identified housing need of the neighbourhood area, Option 1 performs most favourably as it has the largest capacity, allowing for a greater number of homes, including affordable units and housing suitable for young families and the elderly to support independent living. It is noted, however, that the full capacity of the site is unlikely to be developed, as it exceeds the required housing need.
- 3.3.35. Given economies of scale, it is also considered that Option 1 may lead to greater positive effects by delivering more infrastructure alongside housing development at the site. This could include green infrastructure and greater opportunities for net gains in biodiversity, supporting community wellbeing. Given that the full capacity of the site is unlikely to be delivered, there is likely to be space on site for these opportunities to be realised.
- 3.3.36. Regarding proximity to Local Green Spaces (LGSs), as identified in the draft DRNP, all options are within walking distance of Dickleburgh Village Green (H), The Churchyard of All Saints Church (J), the field and former allotment area behind Dickleburgh Church (M), and the green around the Gables, between the Gables, number 43, and the water treatment plant (N).
- 3.3.37. All options are considered to perform similarly in their potential to support sustainable access to local services and facilities. Growth under any option would offer broadly similar walkable access to the limited range of services in the village, including Dickleburgh Primary School, Dickleburgh Park, and Dickleburgh Village Centre. However, Option 2 is slightly closer to Dickleburgh Primary School, Dickleburgh Park, and Dickleburgh Village Centre, whereas Option 4 is the furthest from these facilities.
- 3.3.38. Whilst all options perform relatively equally, Option 1 is ranked most favourable as it has the greatest potential to deliver affordable homes and new infrastructure, including green infrastructure. However, all options are considered likely to lead to **significant positive effects** as they meet the

required housing need of the neighbourhood area and are assumed to deliver a proportion of affordable homes. Options are then ranked on distance to services and facilities, therefore Option 2 ranks the next most favourably, and Option 4, the least favourably.

Transportation

- 3.3.39. All options are considered likely to require infrastructure improvements to accommodate highways access and ensure safe pedestrian access. Proposals under any option will need to be discussed further with the Highways Authority.
- 3.3.40. It is noted that Option 2, if not properly managed, has potential to worsen congestion and lead to road safety issues due to access being proposed on the Ipswich Road. However, appropriate transport planning for the site can ensure that any potential issues are addressed in advance.
- 3.3.41. All options perform similarly in terms of their potential to support sustainable access to services and facilities. This is because growth under any of the options would offer broadly similar potential to walk to the limited range of services and facilities in Dickleburgh village. In this respect, all options will likely lead to a degree of car dependency.
- 3.3.42. Sustainable travel options are limited in Dickleburgh village, with the only two bus services, number 2 (Diss to Norwich) and number 584 (Pulham Market to Diss), stopping outside All Saints Church, which is in walking distance to all options. Whilst some residents may choose to utilise these services, it is likely that many will still opt to use private cars.
- 3.3.43. In terms of Public Rights of Way (PRoW), public footpath Dickleburgh and Rushall FP3 passes along the northern boundary of Option 1, heading southeast towards Dickleburgh village. There is also Dickleburgh and Rushall FP1, which is located directly opposite Option 4, on the northern boundary. If developed, it will be important that this public footpath is maintained, or even enhanced.
- 3.3.44. Overall, all options are considered to perform equally, given they are all within walking distance to the limited services and facilities in Dickleburgh village. Given the relatively small-scale growth proposed for the neighbourhood area, no significant effects are considered likely as it is unlikely that any substantial transport infrastructure improvements will arise from development.

Conclusions

- 3.3.45. All options are considered likely to lead to **significant positive effects** regarding the community wellbeing SEA topic. This is because all options meet the required housing need of the neighbourhood area, including an assumed proportion of affordable homes. All options are also within walking distance to the Local Green Space (LGS) as identified in the draft DRNP.
- 3.3.46. **Significant negative effects** are expected without mitigation for climate change, specifically with relation to flood risk, for Options 1 and 3, with Option 1 in close proximity to Dickleburgh Stream, and Option 3 for surface water flooding. These are also expected for landscape for Option 1, due to

proximity to Dickleburgh Moor, and the greatest loss of greenfield land. Finally, significant negative effects are also expected with relation to historic environment for Options 1 and 2 with relation to the proximity of these options to listed buildings and Dickleburgh Conservation Area.

4. Developing the preferred approach

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

[To be inserted]

4. What are the SEA findings at this stage?

5. Introduction

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

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

2. Methodology

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

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

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

3. Proposed DRNP policies

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

Table 4.1: Proposed DRNP policies

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

4. Overview of the plan

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

5. Appraisal of the plan

Biodiversity and geodiversity

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

recovery at the regional landscape scale. The policy outlines ways in which nature recovery and net gains could be achieved and requires a detailed and budgeted plan in development that evidences long-term net gains.

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

Climate change

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

Landscape

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

Historic environment

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

western part of the settlement of Dickleburgh. This is in addition to 286 heritage assets listed on the Norfolk HER⁹.

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

Land, soil, and water resources

- 4.4.26. The neighbourhood area has a moderate likelihood (20-60%) of being underlain by Best and Most Versatile (BMV) agricultural land. In this respect, development in the neighbourhood area is unlikely to lead to the loss of a large area of productive agricultural land, particularly given the scale of development proposed through the DRNP (25 homes at one site).
- 4.4.27. In terms of water resources, the Dickleburgh Stream passes through the middle of the neighbourhood area. As shown on the Environment Agency's Catchment Data Explorer¹⁰, the most recently completed water quality assessment undertaken in 2019 classifies the Dickleburgh Stream as having a 'moderate ecological status'. The northeastern boundary of the proposed site allocation (Policy DR20) is adjacent to Dickleburgh Stream, and therefore it will be important that any water discharged from the site is

⁹ Norfolk County Council (2022): 'Historic Environment Record', [online] available to access via [this link](#)

¹⁰ Environment Agency (2022): 'Dickleburgh Stream Water Body', [online] available to access via [this link](#)

managed appropriately so that it does not adversely affect the ecological status of the stream. In relation to this, Policy DR12 outlines that sustainable drainage systems should demonstrate mitigation in relation to water quality.

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

Community wellbeing

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

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

Transportation

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

unallocated on-street parking. The policy further encourages the provision of electric vehicle charging points that support more sustainable travel choices.

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

Cumulative effects

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

6. Conclusions and recommendations

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

development. On this basis, no significant deviations from the baseline are anticipated.

5. Next steps

7. Plan finalisation

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

2. Monitoring

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

A.– Regulatory requirements

B.- Scoping information

Appendix 9b

Feedback to SG/Chair re proposed new October SEA 2024

This is a summary of inaccuracies contained within the recent SEA Report.

Working through the Report has also thrown up amendments which should have been incorporated into the most recent dra8 of the NP. On the composite map, Settlement Gap A should be redrawn with the revised boundary as shown correctly on the map on page 52. Local Gap B should be amended on both the composite map and the map on page 52, as per Google Earth screenshot and the map attached. These show the smaller 10m space between the houses on Rectory Road. In addition, on page 95, Paragraph 81 was repeated and one of these should have been deleted.





Turning to the report, the following notes relate to items for consideration or inaccuracies requiring amendment.

The omission of sites 3 and possibly 19, until the latter is explained, render this report questionable. The exclusion of site 3 is being justified as the site is too small to accommodate 25 houses. This may turn out to be the case, however, Site 3 is available to take a proportion of housing if required.. Low density housing numbers suggest 25 dwellings per hectare. Whilst acknowledging that the Neighbourhood Plan seeks to impose fewer than this number, this site should be included in the SEA so that the village have the opportunity to review all potential sites, particularly since the sites on Ipswich Road were preferred by many residents?

Along with, and in the knowledge of the above statements, the following is a list of additional inaccuracies.

Para 3.2.2.1 second line should read 'West of Norwich Road'.

Fig. 3.2 amend Local Gap B as mentioned above.

Para. 3.2.6 Site 19 is mentioned. The NP committee has never addressed site 19 and does not appear to ever have been included this previously. The SEA states that this site could not be confirmed. The SEA two years ago in January 2023 also said that. What is the updated position on this site? Also, Site 3 is said to have been withdrawn, this is not the case and has been on the sites map since the beginning of the Neighbourhood Plan. Is the writer confusing this site with the Chenery site and the fact that the builder withdrew his plans? Even so, as far as the steering group is concerned, no indication has ever been given that the Chenery site has been withdrawn by the owner for consideration for development.

Para. 3.2.9 as above, states sites 3 and 19 cannot be confirmed as available, however, site 3 is available as shown above, and site 19 needs to be explained. Where have these declarations come from? Also, regarding site 3 there is a statement here that says it should be disregarded as it is too small to provide the target number of housing for the parish. That has never been a 'rule' when the NP has been in development. Indeed, various options of multiple-sites were under consideration for a long time (e.g., a combination of the Chenery site plus the Brandreth Road site) Why after 7 years of work is the SEA report suddenly telling us sites can only be considered if they can take the entire

allocation? Where has this come from? Surely that is way beyond their brief? Sites 2 and N3 are included in the assessment and are less than 1 hectare, as is site 8 which is 1.1 hectares.

Para. 3.2.13 Option 2 includes sites 2 and N3, these were withdrawn from by the developer. The sites remain. Again, as above, site 3 should be included and possibly site 19, depending on the answer to 3.2.9 above.

Para. 3.2.23 states all views onto and from the moor must be protected and that site 18 is most likely to impact the moor but this is not the case as with 'boots on the ground' there is no view to the moor from there. Buildings on Norwich Road obscure any view as does the treeline to the east. Refer to the selection of combined photographs from previous hedgerow surveys below taken on the site, clearly illustrating there is no view.



A panorama of views north and east from the NP's selected site, demonstrating there are no views of Dickleburgh Moor at this location

Para. 3.3.2 colour coding is used to indicate significant effects, positive and negative, these codings have been based on the evaluation throughout the report and so should be revisited and revised in light of the previous and following comments.

Para. 3.3.6 Option 2 includes site 3, said to have been discounted by the writer previously.

Para. 3.3.8 N3 irrelevant.

Para. 3.3.12 Option 1 is not in closest proximity to the moor. Using Google Earth measuring tool this is confirmed by the fact that site 18 is actually furthest away. Taking a point in the 'centre' of the moor, the nearest point on site 18 is 860m away, site 14 is 734m away and site 13 is 144m closer than site 18 at 716m. Option 1 proximity to the moor is mentioned in various paragraphs and all should be reviewed.

Para. 3.3.13 mentions Option 2, now invalid as it is in various other paragraphs.

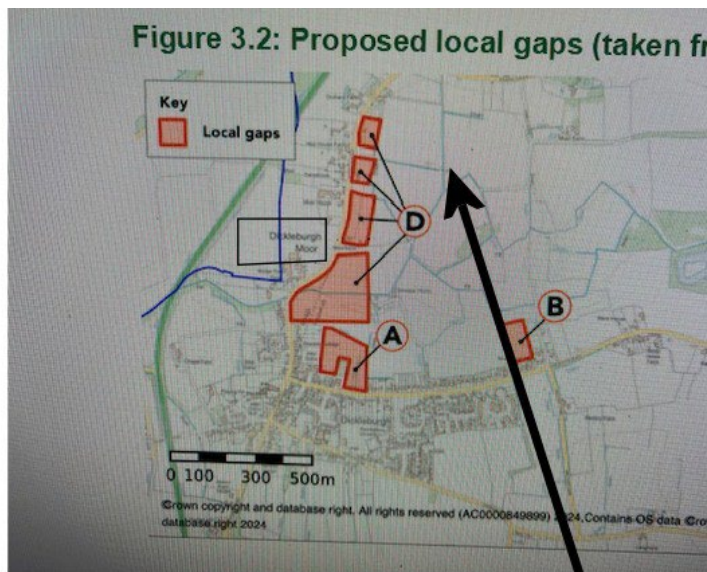
Para. 3.3.17 states flooding of site 8 within Option 3 but site 8 is in Option 4.

Para. 3.3.18 flood risk on Burston Road and Ipswich Road are referred to and are held up as access roads to Options 1 and 2, this is not the case, access is not being considered for these sites from these roads.

Para. 3.3.21 invalid.

Para. 3.3.22 and 3.3.23 as stated, Option 1 sits at a lower elevation than the rest of the village. Option 1 does not impact on the moor for this reason. Is it possible that the writer has confused the name Dickleburgh Moor on the map directly above site 18? This is in fact the name of the settlement, with

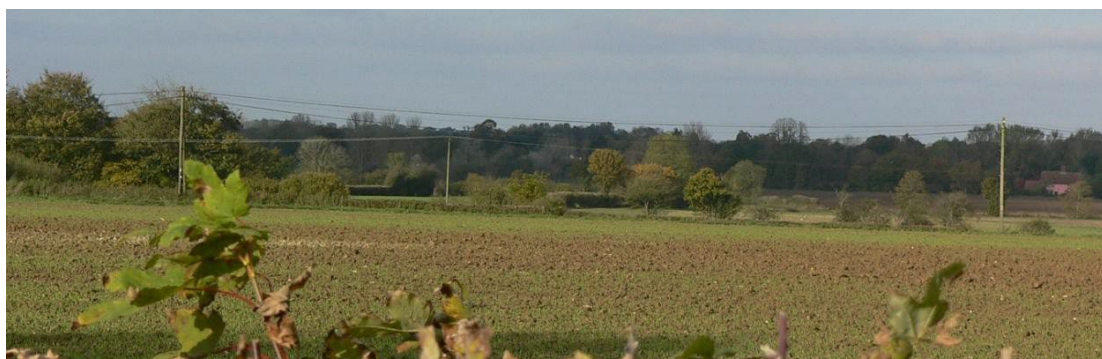
the actual moor being to the north and west of the Option? See below a diagram which may explain the error.



RE the comment about views to and from the Moor.

Is this map, the source of the misunderstanding? The map states 'Dickleburgh Moor' here on the west side of Norwich Road surrounded by the box but notwithstanding the ancient larger area covered by the Moor, the established 'current' location of the Moor sites to the east of Norwich Road shown by the arrow. As additional photographs show there is no view of the Moor from the site selected by the NP

Para. 3.3.24 states that Option 3 is considered the most favourable as it impacts least on the landscape and views. In fact, Option 3, as previously stated, is closest to the moor and has the biggest and one of the best views across the landscape to the moor. Any development on site 13 impacts on Local Gap B and development on site 14 impacts this view across Harleston Road. See photo below.



Para. 3.3.25 discount Option 2, include Option 3 as it is in close proximity and in the heart of three grade II listed buildings, Rectory Farm, Rectory Barn and White Horse Farm.

Para. 3.3.28 Option 3 is not considered to be restrained by the historic environment and ranks least favourably and yet it is adjacent to three of the villages oldest and listed dwellings at the very heart of Option 3 and also in close proximity to archaeological finds. This is another serious omission.

Para. 3.3.37 and 3.3.38 discounting Option 2, this states the sites are in similar walking distance to facilities. This is not the case. Option 4 is not the furthest, Option 3 is the furthest. This is further supported by the fact that, with perhaps the exception of site 11, Option 4 is relatively close to the facilities, i.e. the school, the playing field, the reading room, and by way of a footpath via the village hall, the Church, the village shop, the post office, the pub, the bus stop and the fish & chip shop. Option 3 is furthest from the facilities. Walking options are via Rectory Road which is a busy through road with numerous HGV journeys and hazardous street parking and no pathways or street lights for a good portion of the route. The alternative is to walk down Rectory Lane, onto Harvey Lane and past Option 4 making it a considerable distance further. This paragraph should show Option 3, not Option 4, as least favourable.

Para. 3.3.40 invalid.

Para. 3.3.41 see 3.3.37 above.

Para. 3.3.43 FP 1 should refer to Option 3 not Option 4.

Para. 3.3.44 and 3.3.45 all options are not in walking distance as outlined above and the comment regarding the unlikely event of road improvements renders Option 3 the most hazardous.

Para. 3.3.46 previous comments regarding listed buildings, and Option 1 proximity to the moor, relate to this paragraph also.

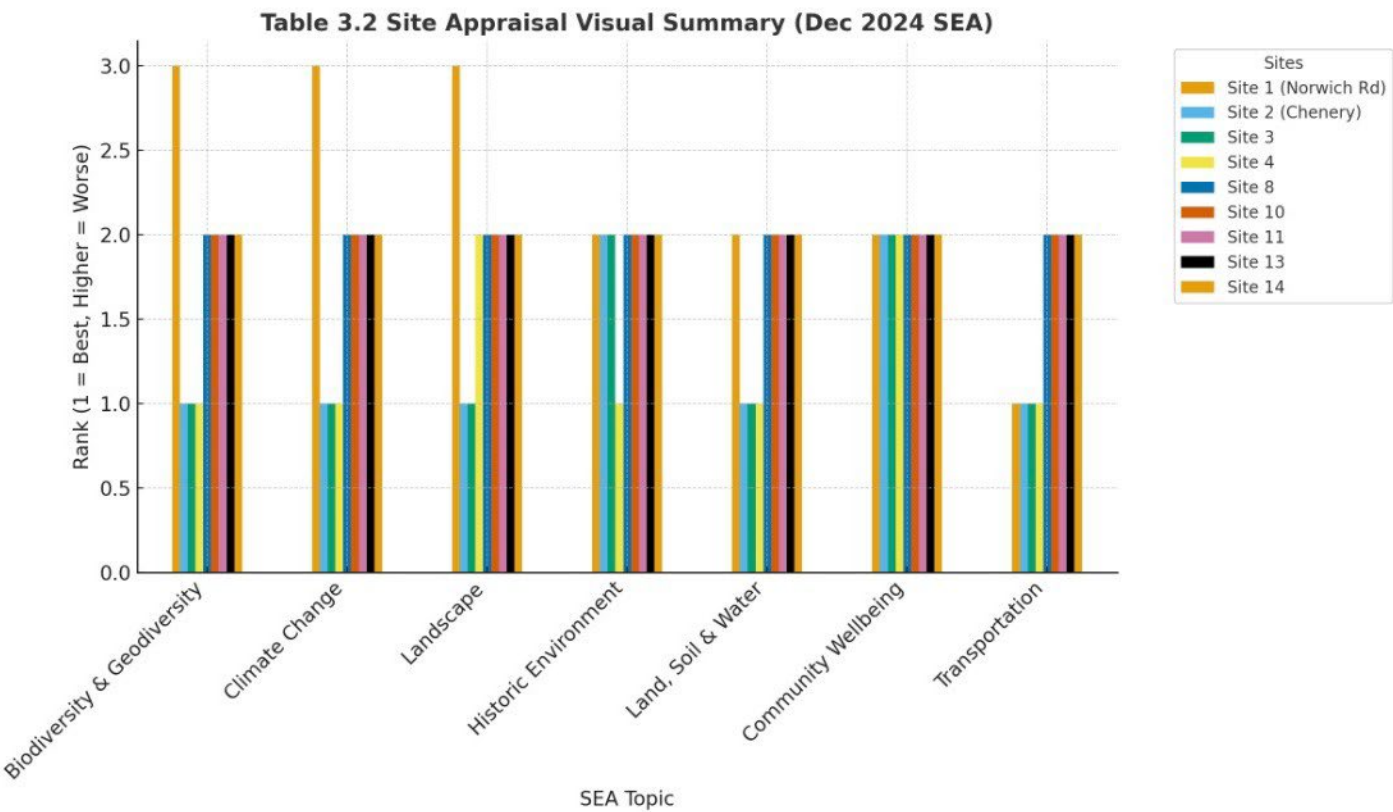
Para. 4.5.3 not sure what relevance this paragraph has and what Langmere Green County Wildlife Site and St. Clements Common have to do with the comments here relating to the site allocation as they are not in any way close to the site.

Para. 4.5.32 this should be amended to read 'Four roads' and include Rectory Lane as agreed in the final dra8 of the NP.

Appendix 10

Table 3.2 Visual Summary December SEA 2024

Table 3.2 Site Appraisal Visual Summary (Dec 2024 SEA)



Statement Appendix J & A Patching, R. Walkley, L.Liggins.

Appendix 11 Presentation to Parish council

Ann please insert the PC banner here

**Dickleburgh and Rushall Parish Council NP presentation Monday
8th July 2024**



Basic Conditions presentation

Policies

Heritage 1

All heritage assets should be conserved in a manner appropriate to their significance. As identified in South Norfolk Council's 'Dickleburgh Conservation Area Character Appraisal and Management Guidelines' (December 2017), the parish's historic environment includes (figure X)

- The Conservation Area
- Listed Buildings, and
- Unlisted Buildings in **Dickleburgh Conservation Area** which are of townscape significance.

The area shown in figure X is also identified as an important 'historic core' due to the Moore, site of an ice age glacier, Stone Age/Bronze Age settlement, sunken Bronze Age pathways, evidence of early Bronze Age boats, pre-Roman archaeological finds, failed Roman Road, the Pye Road (Roman Road), and grade I and grade II Listed Buildings outside the Conservation Area.

All new development should have regard to the above heritage assets and historic core.

Proposals affecting heritage assets or the historic core should give consideration to:

- a. The character, distinctiveness and important features;
- b. The setting and its relationship to its immediate surroundings;
- c. The contribution that the heritage asset or historic core makes to the character of the area.

Heritage 2

Given the significant archaeological finds of previous years in Dickleburgh with Rushall parish (figures X and X), all development must take particular care to preserve any findings of historic importance and have them registered.

Heritage 3

The Neighbourhood Plan seeks to protect views and vistas across the Parish that are valued by residents or hold community importance.

Development proposals should respect the landscape setting including any identified important local views within which they are located, or which they affect. The following views are identified as important in Dickleburgh and Rushall parish (figure X and X):

1. The Moor, from X to X
2. The open field system looking north toward the Moor, from Rectory Road, Dickleburgh
3. The All Saints Church Dickleburgh, from X to X
4. The Church Rushall, from X to X
5. The Village of Dickleburgh, from X to X

[check these views are correct]

Development proposals within or affecting an important local view should demonstrate how they have responded positively to the view concerned and safeguarded its integrity and local importance.

Heritage 4

To maintain the distinct settlements within the parish, development proposals will respect and retain the generally open and undeveloped nature of the following two settlement gaps (figure X):

- A. The gap between the settlement boundary edge of the village of Dickleburgh and Dickleburgh Moor
- B. The gap between the settlement boundary edge of the village of Dickleburgh and hamlet of Langmere (including White Horse Farm)

Permission to build within or on the margins of a settlement gap will be supported if

- a. It can be demonstrated that no alternative development site can be found within the parish
- b. The settlement gap will not be compromised individually or cumulatively with other existing or proposed development
- c. The integrity of the gap will be maintained.
- d. It will respect views and vistas (as identified in policy X).

Heritage 5

Local gaps are identified as small areas between buildings that maintain a sense of place, wellbeing and unique identity of the parish. The following local gaps have been identified:

- A. Beside The Gables in the Village of Dickleburgh
- B. The 10 meter gap west side of New House Farm on the edge of the village of Dickleburgh
- C. The gap between Rushall Church and Rushall along the Langmere Road

Permission to build within, or 5 metres adjacent to, the local gap will be supported where, Permission to build within, or 5 metres adjacent to, the local gap will be supported where,

- a. It can be demonstrated that no alternative development site can be found within the parish
- b. The building, structure or planting, will not affect the integrity of the view or vista (as identified in policy X)
- c. It will not result in a change in density of the area
- d. That the local gap will not be compromised individually or cumulative with other existing or proposed development.

Heritage 6

Ditches, hedges and verges identified on the 1843 map of Dickleburgh and Rushall, and which still exist today (figure X), are recognised as locally important in terms of their heritage and biodiversity value, and should not be compromised.

All new developments should look to enhance the network of ditches, hedges and verges in the parish, using the 1843 map as a reference point.

Housing Policy 1

The Housing Design and Character Guide should be followed for all new developments (Appendix X).

Proposals for new housing development should accord with the following criteria, as appropriate:

1. Dwellings no higher than 2 or 2.5 storeys, reflecting the height, form, massing and scale of the adjacent properties.
2. Density up to 20 dwellings per hectare.
3. Materials should enhance or complement existing adjacent dwellings. High quality, local and sustainable materials should be used where possible.
4. Roof pitches should reflect adjacent properties.
5. Respect neighbouring properties in terms of privacy, overbearing, or overshadowing impact.
6. Be on mains drainage where possible.
7. Gardens should be of a reasonable size to reflect the rural nature of the parish, with larger gardens adjacent to open countryside.
8. Private gardens should not be overlooked by neighbouring properties.

9. Public green space, where the size of the development affords.
10. All development should adhere to Secure by Design principles.

Construction traffic should be not add to mud on the road and damage to highway and safety.

Housing Policy 2

Proposals for new housing of 10 or more homes should provide for a range and mix of all housing sizes, in order to meet the needs of the Dickleburgh and Rushall parish.

The mix of new housing in the parish will be provided in accordance with current and future local needs identified in the most up to date Strategic Housing Market Assessment and community preferences expressed through consultation, in particular

- a. Housing suitable for older people and those with disabilities, including bungalows. Housing should be suitable for independent living, built to the Future Homes Standards and Lifetimes Homes Standard M4(3).
- b. Smaller homes.
- c. Starter homes.
- d. Affordable Housing, as part of a mixed development.

Custom build properties.

Housing Policy 3

The Plan identifies the following existing community infrastructure (as shown on figure X):

1. All Saints' Church and the Church Rooms, Dickleburgh
2. St Mary's Church, Rushall
3. The Reading Room, Dickleburgh
4. The Dickleburgh Village Centre
5. Play area at the Village Centre, Dickleburgh
6. Play area, Millers Drive, Dickleburgh
7. Dickleburgh Church of England Primary Academy
8. Burston Road allotments, Dickleburgh
9. Norwich Road allotments, Dickleburgh
10. Town Land Trust old allotments, field and 1st Dickleburgh Sea Scout hut, Dickleburgh

Proposals for the improvement, adaptation or extension of existing community infrastructure will be supported where they comply with other development plan policies.

Proposals for change of use, involving a potential loss of existing community assets, will only be supported where,

- a. an improved or equivalent facility can be located in an equally or more accessible location in the parish, or
- b. where it can be demonstrated that there is no reasonable prospect of continued viable use.

Housing Policy 4

Car parking should adhere to Norfolk County Council's 'Parking Guidelines for new developments in Norfolk' as a minimum. Reflecting the rural nature of Dickleburgh and Rushall, wherever practical and achievable

car parking for new housing should provide off-road parking as follows:

- 1 bedroom dwelling: minimum of 2 parking spaces
- 2 bedrooms dwelling: minimum of 2 parking spaces
- 3 bedrooms dwelling: minimum of 3 parking spaces
- 4 or more bedrooms dwelling: 4 parking spaces

Where this is not feasible or practical to meet, provision for any deficiency may be achieved by provision of car spaces adjacent to such dwellings in small car parks. In recognition that on-street parking could occur, streets should be designed to safely accommodate unallocated on-street parking. All car parking should be arranged in a way that is not

dominant or detrimental to the sense of place or amenity of adjoining properties and where possible softened by planting.

The provision of electric car charging points is encouraged where it is not mandatory.

Housing Policy 5

It is expected that all new development (homes, community buildings and commercial units) should make use of on-site grey water harvesting. This should be designed into the new development from the outset.

Where it might not be feasible to include grey water recycling, that more ambitious water efficiency standards are included to help reduce potable water use in new homes to 100 litres per person per day through a 'fixtures and fittings' based approach, in line with the Environment Improvement Plan Roadmap to Water Efficiency new standard for new homes in England.

Housing Policy 6

As appropriate to their scale, nature and location, development proposals should:

- a. demonstrate how they can mitigate their own flooding and drainage impacts, avoid an increase of flooding elsewhere and seek to achieve lower than greenfield runoff rates for flooding, e.g. through the use of permeable materials (on free-standing areas such as drives, parking bays, walkways, vehicle laybys, and any public spaces) and planting.
- b. respond positively to the advice and guidance on surface water drainage and the mitigation of flood risk obtainable from Norfolk County Council (as Lead Local Flood Authority) and the relevant Internal Drainage Board (as statutory Drainage Board for the Plan area); and
- c. where appropriate, mitigate and adapt to climate change.

Proposals for development of 3 or more dwellings should include sustainable drainage systems unless it is impracticable to do so. The four pillars of SuDS, namely water quality, water quantity, biodiversity, and amenity, should be demonstrated.

Any surface water drainage ponds associated with any development should appear natural and be able to be colonised by the local flora and fauna whilst maintaining their designed purpose.

The planting of trees, hedges and grasslands, and the creation of ponds, ditches and swales will be preferred as a method to enable water absorption and drainage.

Housing Policy 7

New housing, commercial or industrial development within a radius of 400 metres of the Sewage Works should not occur.

This does not apply to modifications to existing homes, commercial or industrial buildings, and essential services such as Anglia Water, Highways, maintaining or improving services. These proposals must demonstrate they would not prevent or prejudice the operation of Anglian Water's water recycling centres through the submission of an impact assessment.

Housing Policy 8

Dickleburgh and Rushall parish will work towards becoming a low carbon community.

Developers are encouraged to undertake the following climate change mitigation measures:

- a. Low carbon construction on and off-site. A whole life carbon assessment is encouraged for new dwellings, commercial and community builds.
- b. Use of high quality, thermally efficient building materials.
- c. Provision of new safe walking and cycling routes.

- d. Increased biodiversity, through the creation of links between wildlife corridors, new green spaces, tree and hedge planting, and other climate change resilient climate.
- e. Renewable energy for individual dwellings.
- f. Electric car changing points.

Transport Policy 1

Any new development of homes of 3 or more on a single plot, community buildings and commercial development, should quantify the level of traffic movement they are likely to generate and its cumulative effect on the traffic flow within the parish. Mitigation measures should be put in place where there may be a detrimental impact on road safety, pedestrian movement, cycle safety, horse riders, parking and traffic flow.

Three primary roads through the parish are identified as have issues with high traffic volume:

- Ipswich Road
- Norwich Road
- Rectory Road/Harleston Road

Mitigations measures could include traffic calming, changes to road layout, pavement improvements and crossing points.

Transport Policy 2

As appropriate to their scale, nature and location, the design of new residential developments, community buildings and new commercial units, opportunities should be sought to enhance and join up networks of footpaths, green paths and cycleways (including Public Rights of Way) that are suitable for all users, within their designs and layouts. New provision should encourage alternatives to using private cars. Footpaths and cycle ways should be visible and separate from roads where possible.

The provision of new footpaths and cycleways will be supported, in particular where there are opportunities to

- a. Make connections through developments and enable a cohesive village network.
- b. Connect to other surrounding parishes.
- c. Link to existing community infrastructure (as identified in policy X).
- d. Enable access to open countryside.

All pavements must be level with appropriate drop-curbs for access.

Environment Policy 1

Proposals for new development will be expected to retain, protect and enhance existing green corridors within the parish (figure X). The Norfolk Local Nature Recovery Strategy should also be adhered to.

Development must demonstrate how it will contribute to a biodiversity net gain of at least 10 per cent. In the parish this could be achieved through the following:

- a. Good connections for wildlife.
- b. Protecting and enhancing natural assets, such as trees, woodlands, orchards, hedgerows, brooks, springs, ditches or ponds.
- c. Utilising native tree and plant species
- d. Creation of new ditches and hedges.

The developer will be required to evidence how biodiversity net gain will be sustained over the longer term (a minimum of 10 years).

All new roads must be built with open ditches and green verges, unless it can be demonstrated that this would not be possible.

Environment Policy 2

In addition to the County Wildlife Sites in the parish, the following areas are designated as Local Green Spaces for special protection (figure X):

- A. Dickleburgh Village Green, opposite the church
- B. The Churchyard of St. Mary's Church, Rushall
- C. The Churchyard of All Saints Church, Dickleburgh
- D. Dickleburgh Village Hall Playing Fields
- E. The Green on Rectory Road/Catchpole Walk
- F. The former allotment area (managed by the Townlands Trust) behind Dickleburgh Church
- G. The Green around the Gables and between the Gables, number 42, and the water treatment plant.

The management of development within areas of Local Green Space will be consistent with that for development within Green Belts as set out in national policy.

Environmental Policy 3

Development proposals should take account of the parish's existing dark skies (figure X) and seek to limit the impact of light pollution from artificial light. Street lighting will not be supported on any development. For individual dwellings lighting necessary for security or safety should be designed to minimise the impact on dark skies by, for example, minimal light spillage, use of downlighting, movement sensitive lighting and restricting hours of lighting. Lighting likely to cause disturbance or risk to wildlife should not be supported.

Site Allocation

The Neighbourhood Plan allocates the 5.33 hectare site SN0516 (figure X) for residential development, to accommodate up to 25 new homes, of mixed type, tenure and size. The mix should include

- Starter homes
- Affordable Homes (minimum requirement as stated in the Local Plan)
- Custom built homes
- Lifetime homes

In addition to all other development policies, the site requires the following:

- a. The delivery of a coordinated approach to design, layout, landscaping, infrastructure provision across the site through a site masterplan.
- b. A detailed heritage statement that identifies any impacts on heritage assets (as identified in policy X). The area contains pre-Roman and Roman archaeology.
- c. Preservation of the rural nature of the site through the provision of wildlife corridors.
- d. Protection and enhancement of footpath 3 (figure X).
- e. The protection and enhancement of a landscape belt along the north, eastern and western boundary of the site (figure X).
- f. Retention and enhancement of existing trees and hedgerows.

Where possible, the developer of the site is encouraged to incorporate sustainable and/or innovative design and construction principles to achieve net zero carbon emissions during construction and realise sustainability improvements over and above those set by Building Regulations which will be particularly encouraged.

Contents

1. Introduction	3
2. Legal requirements	3
3. Basic Conditions	4
4. Compatibility with Basic Conditions a) and e)	5
5. Compatibility with Basic Condition d)	30
6. Compatibility with Basic Condition f)	36
7. Compatibility with Basic Condition g)	37

1. Introduction

- 1.1. When submitting a Neighbourhood Plan to the Local Authority (in this case South Norfolk Council), it is a requirement that the Plan be accompanied by a number of supporting documents. One of these is commonly referred to as the 'Basic Conditions Statement'. Only a Neighbourhood Plan that meets each of the basic conditions can be put to referendum and if successful, be used to assist in the determination of planning applications.
- 1.2. This Basic Conditions Statement is prepared for use by South Norfolk Council and the Independent Planning Examiner, to assist in making this assessment about the basic conditions.

2. Legal requirements

Legal Requirements: The Dickleburgh and Rushall Neighbourhood Plan is compliant with The Planning and Compulsory Purchase Act 2004 38A (1) & (2) and 38B (a)-(c) (as amended).

Qualifying Body: The Dickleburgh and Rushall Neighbourhood Development Plan is being submitted by a qualifying body – Dickleburgh and Rushall Parish Council. Dickleburgh and Rushall Town Council was confirmed as a qualifying body by South Norfolk Council on 21st July 2017, when the Dickleburgh and Rushall Neighbourhood Plan Area was designated.

A Neighbourhood Development Plan: The Dickleburgh and Rushall Neighbourhood Development Plan is a neighbourhood development plan. It relates to planning matters (the use and development of land) and has been prepared in accordance with the statutory requirements and processes set out in the Town and Country Planning Act 1990 (as amended by the Localism Act 2011) and the Neighbourhood Planning Regulations 2012.

The time period covered: The Dickleburgh and Rushall Neighbourhood Development Plan states the time-period for which it is to have effect (from 2023-2042) a period of 19 years.

Excluded Development: The Dickleburgh and Rushall Neighbourhood Development Plan policies do not relate to excluded development. The Dickleburgh and Rushall Neighbourhood Development Plan does not deal with County Matters (mineral extraction and waste development), nationally significant infrastructure or any other matters set out in Section 61K of the Town and Country Planning Act 1990.

Area of the Neighbourhood Plan: The Dickleburgh and Rushall Neighbourhood Development Plan relates to the Dickleburgh and Rushall Parish Council's Neighbourhood Area and to no other area. There are no other Neighbourhood Plans in place relating to that Neighbourhood Area.

3. **Basic Conditions**

- 3.1. Paragraph 8(2) of Schedule 4B in the Town and Country Planning Act 1990 (as amended by Schedule 10 of the Localism Act 2011 and paragraph 102 (1) of the Levelling Up and Regeneration Act 2023) sets out a series of requirements that Neighbourhood Plans must meet. These 'basic conditions' are set out below:
- 3.2. A draft Plan meets the basic conditions if:
- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the plan (see Section 4 below).
 - (b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order (applies in relation to a Listed Building only) insofar as the order grants planning permission for development that affects the building or its setting (not applicable in respect of the Dickleburgh and Rushall Neighbourhood Plan).
 - (c) Having special regard to the desirability of preserving or enhancing the character or appearance of the Conservation Area it is appropriate to make the order (applies in relation to Conservation Areas only) insofar as the order grants planning permission for development in relation to buildings or land in the area (not applicable in respect of Dickleburgh and Rushall Neighbourhood Development Plan).
 - (d) The making of the Plan contributes to the achievement of sustainable development (see Section 5 below).
 - (e) The making of the Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). (see Section 4 below).

Note: The Levelling up and Regeneration Act 2023, introduces a replacement Basic Condition to replace (e) above as follows, which is yet to be formally enacted but nevertheless has been considered by this statement:

- e) (a) the making of the order/Plan would not have the effect of preventing development from taking place which
 - (i) is proposed in the development plan for the area of the authority (or any part of that area), and*
 - (ii) if it took place, would provide housing**

- (f) The making of the Plan does not breach and is otherwise compatible with EU obligations (see Section 6 below) and,
 - (g) Prescribed conditions are met in relation to the plan and prescribed matters have been complied with, in connection with the proposal for the plan (see Section 7 below).
- 3.3. Where applicable each of these basic conditions is addressed in the following sections. For clarification it should be noted that b) and c) above are not applicable to the Dickleburgh and Rushall Neighbourhood Development Plan and refer to 'Neighbourhood Orders' only.

4. Compliance with Basic Conditions (a) and (e)

- 4.1 The following tables provide an appraisal of the extent to which the Dickleburgh and Rushall Neighbourhood Plan has regard to national policy and is in general conformity with strategic local policy.
- 4.2 The Neighbourhood Plan policies were drafted to be in conformity with the National Planning Policy Framework published in July 2021 and in December 2023. Table A below assesses the degree of regard that the Dickleburgh and Rushall Neighbourhood Development Plan policies have had to NPPF 2023 (Column B).
- 4.3 The adopted Development Plan for Dickleburgh and Rushall comprises a number of documents. The Greater Norwich Joint Core Strategy (JCS) was adopted in 2014 and its plan period extends to 2026. This was subsequently superseded by the policies in the Greater Norwich Local Plan (GNLP) which was adopted in March 2024.
- 4.4. In addition, South Norfolk Council has an adopted Development Management Policies Document (DMPD 2015) and a Site-Specific Allocations and Policies Document (SSAPD 2015).
- 4.5 Therefore the Policies contained within the Dickleburgh and Rushall Neighbourhood Plan have been assessed for their conformity against the existing Development Plan – the Greater Norwich Local Plan (GNLP) (Column C), the South Norfolk Development Management Policies 2015 (Column D), the South Norfolk Site-Specific Allocations and Policies Document (Column E).

- 4.6 During the production of the Neighbourhood Plan, other policies for the area were under-going revision. South Norfolk has produced site specific policies affecting villages in the District; the South Norfolk Village Clusters Housing Allocation Plan (SNVCHAP) is still emerging with consultation undertaken in 2021 and 2023. The VCHAP is a Local Plan document which, once adopted, will become part of the Development Plan for South Norfolk. The plan will identify sites for housing in South Norfolk's villages and will allocate sites for the majority of the 'at least 1,200 new homes' that are to be delivered in the district's village clusters by 2038. The remaining sites are being allocated through the Neighbourhood Plans for Diss and District and Dickleburgh and Rushall Neighbourhood Plan. South Norfolk Council carried out a consultation on alternative sites and focused changes, in relation to the emerging Village Clusters Housing Allocations Plan (VCHAP) which ended in February 2024, the next consultation is expected in July-August 2024. However, because the VCHAP specifically excludes Dickleburgh and Rushall, the policies of this Neighbourhood Plan have not been assessed against the emerging policies in the VCHAP.
- 4.7 In summary, it is the view of the Dickleburgh and Rushall Parish Council (as the relevant Qualifying Body) that the appraisal demonstrates that the Dickleburgh and Rushall Neighbourhood Development Plan has had appropriate regard to and is in general conformity with, both national and strategic policy.

Adopted Policy Documents – Table A

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR1: Heritage	This policy reflects NPPF paragraphs 200, 203 and 209, which outline the approach and weight that should be given to designated and non-designated heritage assets in determining planning applications. Policy DR1 identifies the historic core of the settlement and sets out the criteria that should be taken into account for determining applications which would affect that area.	This policy is consistent with GNLP Policy 3 – Environmental Protection and Enhancement, which requires development proposals to enhance the built and historic environment through avoiding harm to designated and non-designated heritage assets and historic character including their setting unless taking into account their level of significance.	This policy is in conformity with Policy DM 4.10 of the DMPD – Heritage Assets, which ensures that new development must have appropriate regard to the significance and setting of heritage assets including Listed Buildings and Conservation Areas.	This policy is consistent with Section 5 Service Centres of the SSAPD. The text supporting the Dickleburgh and Rushall section provides a description of Dickleburgh and Rushall in terms of form, character, availability of services and the rationale for the 'Development boundary'.

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR2: Archaeology	This policy is consistent with NPPF paragraph 198 which reinforces the benefit of up to date evidence about the historic environment including unidentified heritage assets of archaeological interest which could be discovered in the future. Policy DR2 seeks to ensure that any findings of archaeological importance are registered/recorded.	This policy is consistent with GNLP Policy 3 – Environmental Protection and Enhancement, which requires development proposals to enhance the built and historic environment through avoiding harm to designated and non-designated heritage assets and historic character including their setting unless taking into account their level of significance.	There is no specific equivalent or corresponding policy in the Adopted DMPD.	The SSAPD does not contain an equivalent or corresponding policy.

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR3: Views and vistas	This policy reflects NPPF paragraph 180 b) which recognises the intrinsic character and beauty of the countryside. The policy identifies five important views that it is considered should be protected from development that would have an adverse impact upon the identified view. Justification for the identified views is included in the supporting text to the policy.	This policy is consistent with GNLP Policy 3 – Environmental Protection and Enhancement, which requires ‘development proposals to enhance the natural environment whilst avoiding harm to designated and non-designated assets of the natural environment. Policy DR3 identifies five important views that it is considered should be protected from development that would have an adverse impact upon the identified view.	This policy is consistent with Policy DM 4.5 of the DMPD which requires that development should respect, conserve and where possible, enhance the landscape character of its immediate and wider environment. Development proposals that would cause significant adverse impact on the distinctive landscape characteristics of an area will be refused.	This policy is consistent with Section 5 Service Centres of the SSAPD. The text supporting the Dickleburgh and Rushall section provides a description of Dickleburgh and Rushall in terms of form character, availability of services and the rationale for the ‘Development boundary’.

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR4: Settlement Gaps	This policy is consistent with paragraph 180 a) of the framework which advocates ‘protecting and enhancing valued landscapes’ and NPPF paragraph 180 b) which recognises the intrinsic character and beauty of the countryside’. The policy is also consistent with NPPF paragraph 84 which seeks to avoid the development of isolated new homes within the countryside unless specific circumstances apply. Policy DR recognises the importance and value of the	This policy is locally specific and there is no corresponding GNLP policy.	This policy is consistent with Policy DM 4.5 of the DMPD which requires that development should respect, conserve and where possible, enhance the landscape character of its immediate and wider environment. Development proposals that would cause significant adverse impact on the distinctive landscape characteristics of an area will be refused.	This policy is consistent with Section 5 Service Centres of the SSAPD. The text supporting the Dickleburgh and Rushall section provides a description of Dickleburgh and Rushall in terms of form character, availability of services and the rationale for the ‘Development boundary’.

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR5: Local Gaps	This policy is consistent with NPPF paragraph 135 c) which refers to the importance of ensuring that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting. Policy DR5 identifies three small scale gaps within the main built up area which make a specific contribution to the character of the area and seeks to prevent development which would adversely affect this character.	This policy is locally specific and there is no corresponding GNLP policy.	There is no specific equivalent or corresponding policy in the Adopted DMPD.	This policy is consistent with Section 5 Service Centres of the SSAPD. The text supporting the Dickleburgh and Rushall section provides a description of Dickleburgh and Rushall in terms of form character, availability of services and the rationale for the 'Development boundary'.

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR6: Heritage ditches, hedges and verges	This policy is consistent with NPPF paragraph 195, which identifies heritage sites as including sites and buildings of local historic value and should be conserved in a manner appropriate to their significance. Policy DR6 identifies a number of ditches, hedges and verges identified on the 1843 map of Dickleburgh and Rushall, which still exist today and are recognised as locally important in terms of their heritage and biodiversity value.	This policy is locally specific and there is no corresponding GNLP policy.	This policy is consistent with Policy 4.8 of the DMPD which promotes the retention and conservation of significant biodiversity features including trees and hedgerows	The SSAPD does not contain an equivalent or corresponding policy.

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR7: Design	This policy reflects NPPF Section 12 which indicates that the creation of high quality, beautiful and sustainable buildings and places is fundamental to planning. Policy DR7 is supported by a specific Housing Design and Character Guide which is consistent with the emphasis in NPPF paragraphs 132 and 133. The policy seeks to ensure that all new development should reflect the parish's local distinctiveness and character and seek to enhance its quality.	This policy is consistent with GNLP Policy 2 – Sustainable Communities, which requires new development to create beautiful, well designed places, which respect the character of the local area and seek to enhance it through appropriate design. Policy DR7 is informed by the specific Housing Design and Character Guide.	This policy is consistent with Policy DM 1.4 of the DMPD which seeks to promote high quality design and local distinctiveness and Policy DM 3.8 which sets out the design principles that all development is subject to.	The SSAPD does not contain an equivalent or corresponding policy.

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR8: Local Housing Need	This policy reflects NPPF para 63, which advises that planning policies should reflect the needs of “those who require affordable housing, families with children, older people (including those who require retirement housing, housing with care and care homes) students, people with disabilities, service families, travellers, people, who rent their homes and people wishing to commission or build their own homes”. Policy DR8 supports a range and mix of housing	This policy is consistent with GNLP Policy 5 – Homes, which requires proposals for housing to contribute to a variety of homes in terms of tenure and cost. New homes should provide for a good quality of life in mixed and inclusive communities and major development proposals should provide adaptable homes to meet varied and changing needs. The GNLP policy provides for a range of types of housing including affordable housing, specialist housing and	This policy is consistent with Policy DM 3.1 and 3.2 of the DMPD which seek to ensure that new housing should contribute to a range of dwelling types and meet the needs of different households including Affordable Housing.	The SSAPD does not contain an equivalent or corresponding policy.

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR9: Valued Community Assets	This policy is consistent with the criteria set out in paragraph 97 which requires planning policies to plan to provide the social, recreational and cultural facilities and services that the community needs. In addition, planning policies should aim to “guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs. Policy DR9 seeks to ensure that the existing community infrastructure in	There is no specific GNLP policy that refers to the protection of existing community facilities. Policy 4 of the GNLP – Strategic Infrastructure, emphasises the need to support the timely delivery of infrastructure to support growth and Policy 2 Sustainable Communities promotes an inclusive, resilient and safe community through the provision of facilities and services commensurate with the scale and type of the development; and the	This policy is consistent with Policy 3.16 of the DMPD which seeks to protect existing community facilities through a criteria-based policy. The criteria relate to viability, alternative provision and consistency with community led plans in the area.	The SSAPD does not contain an equivalent or corresponding policy.

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR10: Parking for the building of new houses or conversions	This policy is consistent with NPPF paragraph 111 which sets out guidance for the setting of local parking standards for residential and non-residential development. Considerations should include the type, mix and use of the development, the accessibility of the development and the availability of public transport. Policy DR10 sets out standards for parking in new developments based on size of dwelling. Where new parking is required, the policy sets out criteria for designing attractive	This policy is consistent with GNLP Policy 2 Sustainable Communities which ensure safe, and convenient and sustainable access for all, including by non-car modes, to on-site and local services and facilities including such as schools, health care, shops, recreation/leisure/ community/ faith facilities and libraries; encourage walking, cycling and public transport through the layout of development; and integrate parking to avoid it	This policy is consistent with DM Policy 3.12 which ensures that development should provide sufficient parking to avoid highway safety problems and to protect living and working conditions locally. In decision making, consideration will be given to local parking / highway conditions.	The SSAPD does not contain an equivalent or corresponding policy.

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Policy DR11: Water harvesting	There is no corresponding reference in the NPPF to the matters covered by this policy.	This policy is consistent with GNLP Policy 2 – Sustainable Communities, which supports efficient water management and requires new housing development to meet the Building Regulations part G (amended 2016) water efficiency higher optional standard; and Non-housing development will meet the BREEAM “Very Good” water efficiency standard, or any equivalent successor.	The DMPD does not contain an equivalent or corresponding policy.	The SSAPD does not contain an equivalent or corresponding policy.

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR12: Flooding and surface water drainage issues	This policy reflects NPPF paragraph 165 which encourages development to be directed away from areas of flood risk and should not increase flood risk elsewhere. Policy DR12 contains specific support for the inclusion of SUDs within new developments to protect against flooding and pollution and also to provide biodiversity benefits.	This policy is consistent with GNLP Policy 2 – Sustainable Communities, which seeks avoid locating inappropriate development in areas at risk of flooding by applying the sequential and exceptions tests and ensuring that flood risk is not increased elsewhere. Sustainable drainage systems should be incorporated unless there is clear evidence that this would be inappropriate.	This policy is consistent with Policy 4.2 of the DMPD which seeks to ensure that sustainable drainage measures are fully integrated within design to manage any surface water arising from development proposals, and to minimise the risk of flooding on the development site and in the surrounding area.	The SSAPD does not contain an equivalent or corresponding policy.
Policy DR13: Cordon Sanitaire	There is no corresponding reference in the NPPF to the matters covered by this policy.	This is a locally specific policy and there is no equivalent in the GNLP.	There is no specific equivalent or corresponding policy in the Adopted DMPD.	The SSAPD does not contain an equivalent or corresponding policy.

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR14: Carbon offsetting for new builds	This policy is consistent with NPPF paragraph 160 which requires plans to provide a positive strategy for energy from renewable and low carbon sources. Policy DR14 provides support for the parish to move towards becoming a low carbon community and encourages the inclusion of climate change mitigation measures within new builds.	This policy is consistent with GNLP Policy 2 – Sustainable Communities, which seeks to minimise energy demand through the design and orientation of development and maximise the use of sustainable energy, local energy networks and battery storage to assist growth delivery. This includes new development to provide a 19% reduction against Part L of the 2013 Building Regulations (amended 2016); and appropriate non-housing development of 500 square	There is no specific equivalent or corresponding policy in the Adopted DMPD.	The SSAPD does not contain an equivalent or corresponding policy.

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR15: Local traffic Generation	This policy is consistent with NPPF para 115 which states that development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe. Policy DR15 requires proposals over 3 dwellings and/or commercial development to quantify the level of traffic movement they are likely to generate and its cumulative effect on the traffic flow within the parish.	This policy is consistent with GNLP Policy 2 Sustainable Communities which ensure safe, and convenient and sustainable access for all, including by non-car modes, to on-site and local services and facilities including such as schools, health care, shops, recreation/leisure/community/faith facilities and libraries; encourage walking, cycling and public transport through the layout of development; and integrate parking to avoid it	This policy is consistent with DM Policy 3.11, Road Safety and the free flow of traffic which seeks to ensure that new development will not be permitted that endangers highway safety or the satisfactory functioning of the highway network	The SSAPD does not contain an equivalent or corresponding policy.

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Policy DR16: walking, cycling and horse-riding	This policy is consistent with paragraph 96 (c) of the NPPF which supports healthy lifestyles through encouraging walking and cycling and paragraph 108 (c) which promotes walking and cycling as a preferred transport option. Policy DR16 encourages the creation of new connections for pedestrians, cyclists and horse riders and encourages the use of other transport methods as alternatives to the private car.	This policy is consistent with GNLP Policy 2 Sustainable Communities which ensure safe, and convenient and sustainable access for all, including by non-car modes, to on-site and local services and facilities including such as schools, health care, shops, recreation/leisure/community/faith facilities and libraries; encourage walking, cycling and public transport through the layout of development; and integrate parking to avoid it	This policy is consistent with Adopted DMPD Policy DM 3.10 Promotion of sustainable transport which requires that all development should support sustainable transport and development objectives, utilise all opportunities to integrate with local sustainable transport networks, be designed to reduce the need to travel and to maximise the use of sustainable forms of transport appropriate to the location.	The SSAPD does not contain an equivalent or corresponding policy.

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR17: Green corridors	This policy is consistent with paragraph 180 (d) of the NPPF which requires planning policies to minimise impacts on and provide net gains for biodiversity. In addition, paragraph 185 (b) of the NPPF refers to the pursuit of opportunities for measurable biodiversity net gains. Policy DR17 provides support for biodiversity net gain in new developments including the creation of new ditches and hedges, protection of existing natural features, and improving connections for wildlife.	This policy is broadly consistent with Policy 2 Sustainable Communities which seeks to create and contribute to multi-functional green infrastructure links, whether provided on-site or off-site, including through landscaping, street trees and other tree planting, to make best use of site characteristics and integrate into the surroundings, having regard to relevant taking account of local green infrastructure strategies and delivery plans. This policy is consistent	This policy is consistent with Policy 4.8 of the DMPD which promotes the retention and conservation of significant biodiversity features including trees and hedgerows.	The SSAPD does not contain an equivalent or corresponding policy.

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR18: Local Green Spaces	This policy reflects NPPF paras 105-107 which advocates “The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them”. Policy DR18 proposes seven spaces proposed for protection and identification as LGS.	There is no specific GNLP policy that refers to local green spaces.	The DMPD contains Policy 4.4 which relates to locally important open spaces. The policy makes reference to a number of specific spaces, however none of these are within this Neighbourhood Plan area.	The SSAPD does not contain an equivalent or corresponding policy.

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR19: Dark Skies	This policy is consistent with NPPF paragraph 191 c) which refers to the desire to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes, and nature conservation. Policy DR19 seeks to limit the impact of lighting from new development on dark skies.	There is no equivalent or corresponding policy relating to light pollution of dark skies in the GNLP.	This policy is consistent with DMPD Policy 3.13: Amenity, noise and quality of life which seeks to protect residential amenity against light pollution.	The SSAPD does not contain an equivalent or corresponding policy.

Column A The Dickleburgh and Rushall Neighbourhood Development Plan Policy	Column B National Planning Policy Framework 2023 (NPPF)	Column C Greater Norwich Local Plan 2024 (GNLP)	Column D South Norfolk Development Management Policies 2015 (DMPD)	Column E South Norfolk Site Specific Allocations and Policies Document 2015 (SSAPD)
Policy DR20: Allocation	This policy is consistent with NPPF paragraph 28 which indicates that Neighbourhood Plans can allocate sites and para 29 which states that Neighbourhood Plans should not promote less development than that set out in the strategic policies for the area. The Neighbourhood Plan makes an allocation for 25 dwellings which is consistent with the adopted strategic policies for the parish.	This policy is consistent with GNLP Policy 1 which sets out the settlement hierarchy and indicates that further allocations will be made in the rural areas of South Norfolk.	This policy is consistent with Adopted DMPD Policy 1.3 which identifies the sustainable locations of new development. The policy requires that new development be located on Allocated Sites or within the development boundaries of Settlements ... of a scale proportionate to the level of growth planned in that location, and the role and function of the Settlement within which it is located, as defined in the Local Plan.	The SSAPD contains Policy DIC1 which allocates land for 20 dwellings north of Langmere Road and east of Limmer Avenue. This development is now complete.

Compliance with new Basic Condition e) a) i) and ii)

4.8 The Levelling Up and Regeneration Act introduced a replacement Basic Condition:

- e) a) the making of the order/Plan would not have the effect of preventing development from taking place which
 - (i) is proposed in the development plan for the area of the authority (or any part of that area), and
 - (ii) if it took place, would provide housing.

4.9 Under Policy 15 of the Joint Core Strategy (JCS), Dickleburgh was identified as Service Village. The policy indicated that in each Service Village land will be allocated for small-scale housing development subject to form and character considerations. Small scale employment or service development appropriate to the scale and needs of the village and its immediate surroundings will be encouraged. Existing local shops and services will be protected. The South Norfolk Site Specifics Plan (SSAPDPD) made provision for 20 dwellings in the form of a housing allocation (Site DIC1) at Land north of Langmere Road and east of Limmer Avenue. This site has now been constructed.

4.10 The Adopted Greater Norwich Local Plan (GNLP), does not make specific recommendations in respect of Dickleburgh, but instead identifies that a separate Village Clusters Housing Allocation Plan (for South Norfolk)will be produced which will address the distribution of the approximately 1200 new homes planned for the South Norfolk rural villages. However, the VCHAP specifically excludes Dickleburgh and Rushall on the basis that the Neighbourhood Plan would address the need for a new housing site in the neighbourhood area. The Submission Version of the Neighbourhood Plan fulfils this expectation by including an allocation on a site of 5.33 hectares at land east of Chapel Farm for 25 new homes. The site was submitted during the Call for Sites process for the production of the GNLP and is known as GNLP0516.

4.11 In order to be compliant with the new Basic Condition, the policies of the Dickleburgh and Rushall Neighbourhood Plan should not prevent any allocations in the GNLP from coming forward. As outlined above the Neighbourhood Plan makes provision for 25 new dwellings, consistent with the expectations in the strategic policies contained in the GNLP. The Neighbourhood Plan therefore complies with this revised Basic Condition.

5. Compliance with Basic Condition d)

- 5.1 The NPPF 2023 states that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.¹ The appraisal of the Dickleburgh and Rushall Neighbourhood Development Plan policies against NPPF policies presented above, demonstrates how policies in the Neighbourhood Plan comply with the NPPF and therefore deliver sustainable development.
- 5.2. The NPPF states that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).

Economic, social, and environmental objectives

- 5.3 These objectives give rise to the need for the planning system to perform a number of roles as defined by the NPPF and set out below.
- 5.4 The objectives and policies contained within the Dickleburgh and Rushall Neighbourhood Plan contribute towards each of these three objectives and cumulatively contribute to the achievement of sustainable development. How they achieve this is summarised below. Unsurprisingly, there is a degree of cross-over between policies and many contribute to more than one of the sustainable development objectives e.g. **DR7 Design** which contributes to both social and environmental objectives.
- 5.5 The plan has been formulated with Sustainable Development at its heart. The embedded theme of sustainability is reflected in the overarching vision for the plan, which reflects the three distinct strands of sustainability – economic, environmental, and social. In addition, **Policy HING1** has been specifically devised to relate those three strands of sustainability to a Dickleburgh and Rushall context.

Vision

¹ Resolution 42/187 of the United Nations General Assembly.

The nature and character of our rural villages will be preserved and retained, in order to meet the various needs of residents, contribute to a high quality of life and provide opportunity and choice. This will be achieved in ways that make effective use of natural resources, enhance the environment and natural diversity, promote social inclusion, and supports the local economy.

5.6 This table below helps to demonstrate the Plan's comprehensive contribution to sustainable development.

NPPF Sustainable Development	Contribution through The Dickleburgh and Rushall Neighbourhood Plan Objectives and Policies
NPPF 2023 An economic objective: to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places, and at the right time to support growth, innovation, and improved productivity; and by identifying and co-ordinating the provision of infrastructure.	<u>Housing:</u> Objective 1: To provide sufficient and appropriate high-quality housing in small-scale developments to meet local needs within a balanced housing market. <u>Transport:</u> Objective 4: To future proof the housing infrastructure to support environmentally friendly transport. Policy DR9: Valued community assets. This policy identifies the existing community infrastructure in the parish and seeks to protect it from development that would result in its loss. Policy DR13: Cordon sanitaire. This policy identifies a cordon sanitaire of 400m around the existing sewage works within which new development cannot take place in order to protect the amenity of residents but also to enable the safe operation and maintenance of sewage infrastructure. Policy DR15: Local traffic generation. This policy seeks to ensure that where new development over 3 dwellings is permitted, that any necessary mitigatory measures required to address additional traffic generation are put in place. Policy DR20: Housing allocation. This policy allocates a site for 25 new dwellings in the Neighbourhood Area.

NPPF Sustainable Development	Contribution through The Dickleburgh and Rushall Neighbourhood Plan Objectives and Policies
NNPF 2023 A social objective: to support strong, vibrant, and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful, and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and	<u>Housing:</u> Objective 1: To provide sufficient and appropriate high-quality housing in small-scale developments to meet local needs within a balanced housing market. <u>Transport:</u> Objective 1: Address the issue of significant numbers of lorries and HGVs travelling through areas of the parish judged to be hazardous and perilous to both pedestrians and the environment Objective 2: Improve the safety of pedestrians and residents of the Parish. Objective 3: Reduce traffic congestion in the Parish. <u>Environmental and Biodiversity</u> Objective 5: Establish clean environment policies to address issues of pollution and promote well-being, and improved public health. This will include a 'beautification' policy as part of the approach to promote well-being by improving the overall visual enhancement and character of the Parish. Policy DR1: Heritage. This policy seeks to conserve the historic assets of the parish, including listed and unlisted buildings and the conservation area. It sets out specific area of specific in the historic core of the settlement. Policy DR2: Archaeology. As a consequence of the significant archaeological find in the parish, this policy requires proposals for new development to preserve any findings of archaeological importance and have them registered. Policy DR7: Design. This policy seeks to ensure that the design of all new development in Dickleburgh and Rushall parish should reflect the rural nature and add to the beautification of the locality. The policy is supported by the Housing Design and Character Guide.

NPPF Sustainable Development	Contribution through The Dickleburgh and Rushall Neighbourhood Plan Objectives and Policies
NPPF 2023 An environmental role: to protect and enhance our natural, built, and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.	<u>Housing</u> Objective 2: To provide mixed-use development that complements the character and heritage of the rural villages of Dickleburgh and Rushall. <u>Transport:</u> Objective 4: To future proof the housing infrastructure to support environmentally friendly transport. <u>Environmental and Biodiversity</u> Objective 1: To put in place measures and policies that; ensure the protection and enhancement of all our natural habitats, including hedgerows, coppices, ditches and key natural environmental assets, in order to encourage an increase in biodiversity across the Parish and provide environments conducive to maintaining healthy populations of birds, bats and other fauna. An element of this will require developers planting native green hedging rather than solid wood fencing and providing additional habitats and wildlife corridors for hedgehogs and other small mammals, enabling free-roaming into and through the development and hamlet or village. Objective 2: To Protect and promote an increase of green footpaths, bridleways and cycleways to further enable public access to open countryside, green sites for community use and woodlands, including any new Parish Woodlands. And protect and enhance vistas and views of significance within the Parish. Objective 3: To ensure the maintenance of distinct settlements and define clear settlement gaps to ensure the continuance of these distinct and separate settlements. For the sake of this document, a separate settlement can be distinguished by the separation of dwellings from larger settlements/hamlets by a field or defined boundary. Objective 4: To challenge environmental risk and promote carbon offsetting by supporting creative thinking and solutions that safeguard and enhance the natural environment. To promote, within the

6 Compatibility with Basic Condition f)

- 6.1 The statement below demonstrates how the Dickleburgh and Rushall Neighbourhood Development Plan does not breach and is compatible with all relevant EU obligations. The United Kingdom formally left the European Union on the 31st of January 2020, which was followed by an 11-month transition period that expired on 31st December 2020. Basic Condition (f) of the Neighbourhood Plan Regulations 2012 requires that the making of a Neighbourhood Plan should not breach nor be incompatible with European Obligations. These include those relating to environmental matters such as Habitats and Species.
- 6.2 Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) are required to be carried out with regard to the Conservation Objectives of any European Protected Wildlife Sites deemed to be within a relative proximity of the Dickleburgh and Rushall Neighbourhood Plan Area. There are no internationally or nationally designated sites within the Dickleburgh and Rushall Neighbourhood Area, however the majority of the Dickleburgh and Rushall parish and the nearest designated site – Gawdyhall Big Wood Harleston SSSI – is 3.6 kilometres away from the boundary of the neighbourhood area. Whilst IRZs for this SSSI, and others within the vicinity of the neighbourhood area, intersect the neighbourhood area, these only impact residential/ rural residential development of 50 units or more, which exceeds the 25 homes that the D&RNP are required to deliver over the plan period.
- 6.3 South Norfolk District Council recommends that the Screening processes in respect of both SEA and HRA be undertaken just prior to Pre-Submission stage. Screening Assessments were carried out by South Norfolk Council during XXXXX when the three Environmental Bodies were consulted.
- 6.4 The key question in the SEA screening process for the Dickleburgh and Rushall Neighbourhood Plan was whether the plan would be likely to have a significant effect on the environment. The relevant steps for determining this are set out in Annex II of the SEA Directive². As a result of the findings of the screening process it was that the Dickleburgh and Rushall Neighbourhood Plan would require full Strategic Environmental Assessment (SEA) based largely on the fact that the Neighbourhood Plan was making a specific allocation for 25 dwellings, that was not included within the SEA scope of any other adopted planning documents.
- 6.5 Consultants AECOM were commissioned to undertake the SEA and produce the Environmental Report. The SEA was completed in January 2023 and informed the Pre-Submission Consultation which took place in XXXXXX. The SEA conclusions were as follows:

² The SEA Directive (Directive 2001/42/EC)

- **“Significant positive effects** are only anticipated for the community wellbeing SEA topic. This is because the spatial strategy exceeds the identified local housing need, locating development close to existing services and facilities in Dickleburgh Village, whilst the D&RNP policy framework seeks to protect community assets and prioritises the wellbeing of residents.
- **Minor positive effects** are considered likely for the biodiversity and geodiversity and landscape SEA topics. With respect to biodiversity and geodiversity, the policy framework seeks to protect priority species and habitats, enhance the biodiversity value of LGSs, and deliver at least 10% net gain amongst other things. With respect to landscape, the spatial strategy avoids significant impacts arising by locating development adjacent to the existing settlement, outside of the identified settlement and local gaps. Whilst the spatial strategy will lead to the loss of greenfield land, it is recognised that this is largely unavoidable. The policy framework strengthens the spatial strategy by mitigating any adverse impacts of development and protecting and enhancing the local landscape and villagescape.
- **Broadly neutral effects** are concluded for the climate change SEA topic because, by recognising growth will occur with or without the D&RNP, the increase in the built footprint of the neighbourhood area and absolute emissions are not considered a consequence of the plan. On this basis, and alongside the avoidance of significant effects in relation to flood risk, no significant deviations from the baseline are anticipated.
- **Uncertainty** is noted for the historic environment and land, soil and water resources SEA topics. With respect to the historic environment, the policy framework performs well and is considered likely to ensure that new development is in keeping with the character of Dickleburgh village. However, there is a degree of uncertainty surrounding the recent archaeological finds at Dickleburgh Moor. With respect to land, soil and water resources, whilst the allocated site will lead to the loss of greenfield land, it is recognised that this is largely unavoidable. The spatial strategy delivers development adjacent to the Dickleburgh Stream, and whilst it is considered likely that this part of the site will not be developed, this cannot be confirmed at this stage.
- Finally, **minor negative effects** are anticipated for the transportation SEA topic. It is recognised that growth is anticipated in the neighbourhood area with or without the D&RNP, and therefore increases in vehicle use on local roads are an inevitable evolution of the baseline. In addition, the spatial strategy locates development close to local services and facilities and the bus stop in Dickleburgh village, and the policy framework seeks to mitigate adverse effects of new development, including traffic and congestion and road safety. However, given the limited services and facilities and public transport options available, residents will still likely rely on the private car to a considerable degree.”

- 6.6 The SEA also considered the cumulative effect so the Neighbourhood Plan policies when taken in combination with those in other relevant planning documents and concluded as follows:
“Alongside the provisions of the GNLP, VCHAP and NPPF, the D&RNP seeks to support housing delivery in line with forecasted needs over the plan period whilst avoiding significant negative effects in relation to the SEA topics explored above. In this respect, positive cumulative effects are anticipated.”
- 6.7 The report recommendations were set out as follows:
“Recommendations: As the D&RNP avoids any significant negative effects, no specific recommendations are made at this stage.”
- 6.8 Following the conclusion of the Pre-submission consultation, a number of amendments to the Neighbourhood Plan were made. However, these focussed on providing greater clarity to existing policy wording and did not result in the addition of any new policies or an alteration to the broad direction and impact of those existing policies.

Human rights

- 6.9 In addition the Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. The accompanying Consultation Statement sets out the process followed in terms of community involvement. The Neighbourhood Plan is seeking to protect both non-designated heritage assets and local green spaces, some of which are in private ownership. Private owners have been notified of the contents of the plan and many have responded through the consultation processes.

7. Compatibility with Basic Condition (g)

- 7.1 An additional basic condition is prescribed under Regulation 32 of the Neighbourhood Planning (General) Regulations 2012 as follows:
“The making of the Neighbourhood Development Plan is not likely to have any significant effect on a European Site (as defined in the Conservation of Habitats and Species Regulations 2010 (2)) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c) Regulations 2007 (3)), (either alone or in combination with other plans and projects)”.
- 7.2. The purpose of the Habitat Regulations Assessment (HRA) is therefore to ensure the protection of European (Natura 2000) sites. These sites are designed to form an ecologically coherent network of designated sites across

the whole of Europe. Referred to as 'European Designated Sites,' Natura 2000 sites include Special Protection Areas (SPAs) and Special Areas for Conservation (SAC).

7.3. Screening undertaken by South Norfolk Council in XXXX 2023 concluded that a full Habitats Regulation Assessment was required for the Neighbourhood Plan. Consultants AECOM were commissioned by the Parish Council to undertake this work and the assessment was completed in May 2022. The Neighbourhood Area falls within 10km of two key nature conservation sites . These are:

- Waveney and Little Ouse Valley Fens SAC (approx. 9.9km to the west of the Parish and distributed across the authorities of Breckland and Mid Suffolk)
- Redgrave and South Lopham Fens Ramsar (approx. 9.9km to the west of the Parish and distributed across the authorities of Breckland and Mid Suffolk).

7.4. The HRA considers environmental issues such as recreational pressure, water quantity level and flow, water quality and atmospheric pollution. The HRA advises for clarity, that the South Norfolk Local Plan requirement for financial contributions to delivery of the Norfolk Green Infrastructure and Recreation Avoidance Mitigation Strategy (GIRAMS) is referenced in the Neighbourhood Plan with regard to housing growth generally and to the proposed allocated site SN0516 in particular.

7.5. The HRA is required to provide an 'In-Combination Assessment', which is the requirement to assess the potential impacts of a Neighbourhood Plan in-combination with growth in adjoining parishes. The HRA assessed the potential for the Neighbourhood Plan to result in Likely Significant Effects (LSE) and, potentially, adverse effects on the integrity of European sites. An initial scoping exercise highlighted that two European sites within 10km of the parish required further consideration, including the Waveney and Little Ouse Valley Fens SAC and Redgrave & South Lopham Fens Ramsar. The potential impact pathways associated with development in the parish are recreational pressure (applicable to all European sites Norfolk), water quantity, level and flow, water quality and atmospheric pollution.

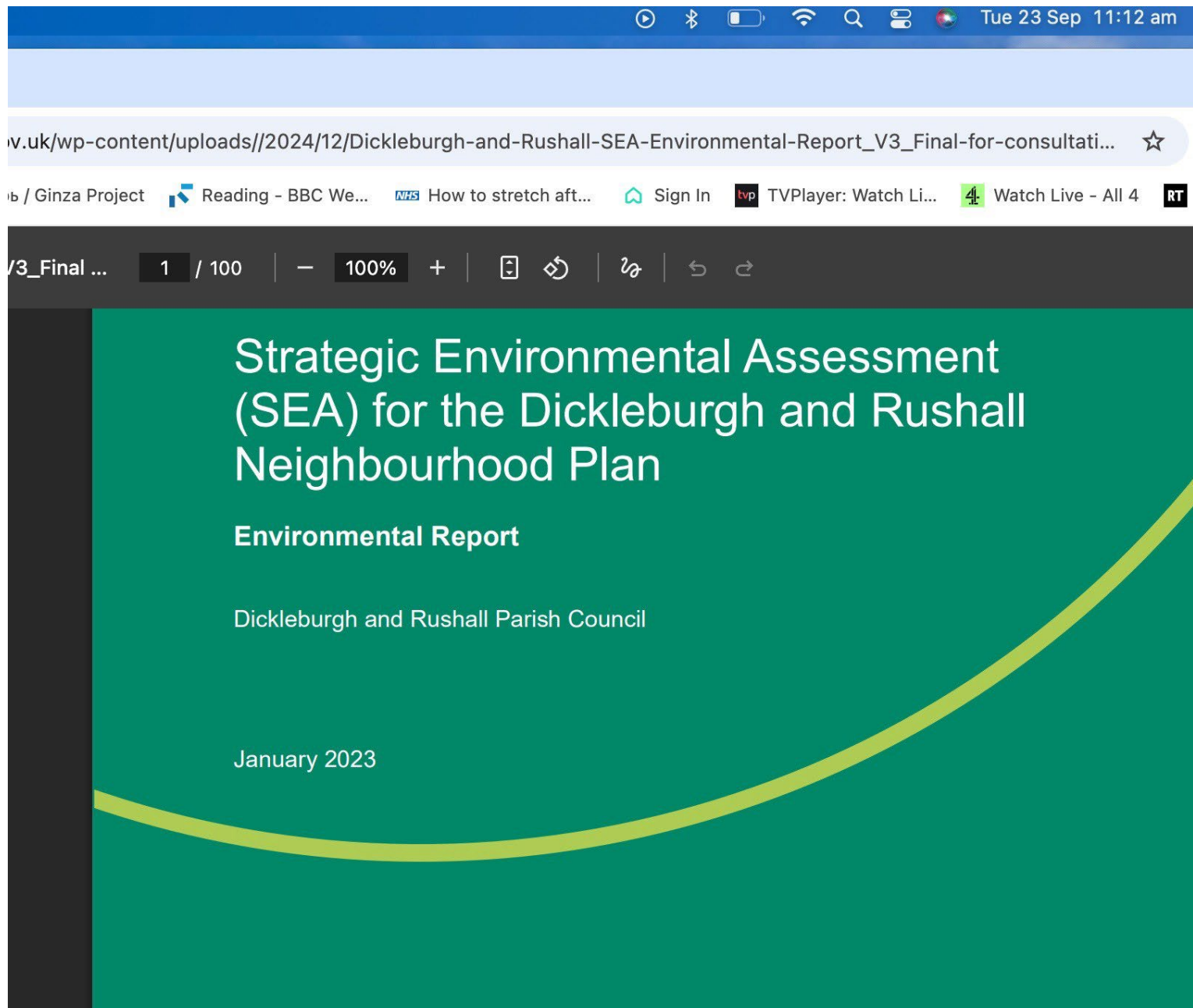
7.6. It was concluded that LSEs regarding the above impact pathways could be screened out from Appropriate Assessment, with the exception of recreational pressure on European sites across Norfolk. However, since there is already a county-wide mitigation strategy to address recreational pressure to which all net new housing much contribute, (GIRAMS) it was possible in the appropriate assessment to conclude that Dickleburgh & Rushall Neighbourhood Plan would not have an adverse effect on European sites either alone or in combination with other plans and projects.

- 7.7 It is therefore considered by the Parish Council, as the relevant Qualifying Body, that the Neighbourhood Plan meets the additional prescribed basic condition.

Statement Appendix J & A Patching, R. Walkley, L.Liggins.

Appendix 14

Dickleburgh and Rushall PC website with January 2023 SEA



Appendix 15

Dickleburgh and Rushall PC website no PC council minutes published after February 2025

Minutes of Parish Council meetings are available to read between two weeks after a council meeting. They are published in draft form and approved at the next council meeting. Agendas are published 3 -5 days before a Monday meeting. A copy is also displayed on the noticeboard & this website.

2025 Meetings

8th Septembe | [Agenda](#)

14th July | [Agenda](#)

2nd June | [Agenda](#) | [Minutes](#)

12th May | [Agenda](#) | [Minutes](#)

14th April | [Agenda](#) | [Minutes](#)

10th March | [Agenda](#) | [Minutes](#)

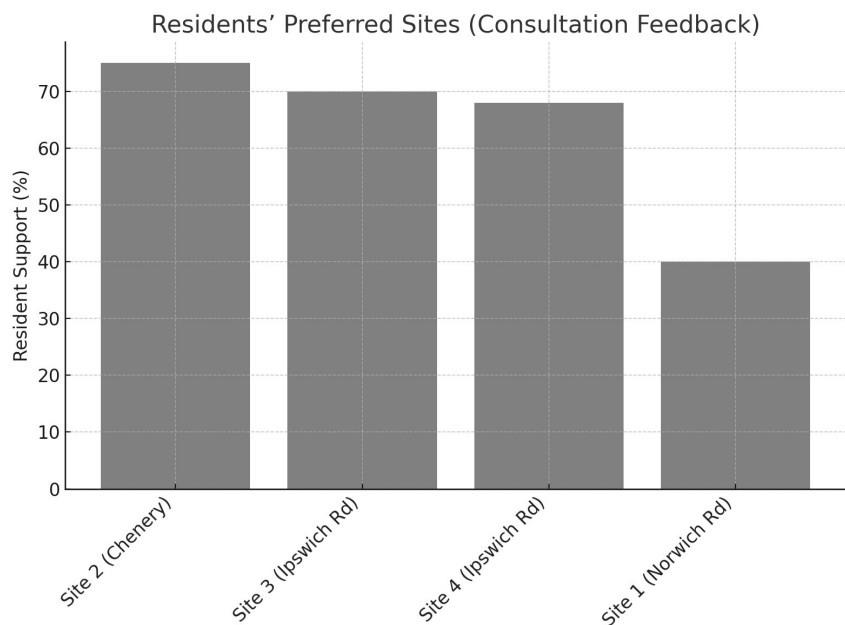
10th February | [Agenda](#) | [Minutes](#)

13th January 2025 | [Agenda](#) | [Minutes](#)

2024 Meetings

Appendix 16

HELAA and resident views



Appendix 17

Email from JP to Chair if SG June 2023 re SG composition

From: Jackie Patching
Date: 30 June 2023 at 14:45:54 BST
To: SG chair
Subject: Regulation 14 review of comments meeting

Hi Andrew,

Have been reflecting on our meeting the other day.

I still have reservations about the wisdom of inviting the extra individuals who have not been Neighbourhood Plan committee members to the review meeting. My main concern is that if we invite individuals such as those you mention from Burston Road then we are being selective about who in the Parish is included and has a say.

Shouldn't the main objective be to allow the process to take its course, having followed the procedures and gone through Regulation 14, which was the opportunity for them and everyone else to put forward their views on the Plan. There may be others in the village who would accept an invitation to the meeting but the majority won't have the opportunity because they are not as vocal.

I believe you may have said that these people are now committee members, but my fear is they are simply showing an interest and turning up in the capacity as a private resident who has a personal interest in the plan and that is very different from having been a committee member and actively contributed to the Plan. There must be rules about the make up of a committee and surely these circumstances are not legitimate??

I believe the opportunity for these individuals was Regulation 14. We can't run the risk of additional 'after the event' members of the committee, who just become an obstructive force, having input when the majority of the Parishioners won't have individual input, not forgetting that there may be other latecomers to the village who more reasonably took the view that the Plan already existed.

Alan is of a similar mind but would like a further discussion on the matter to talk it through.

Kind regards,
Jackie