

Sustainability Appraisal (SA) of the South Norfolk Village Clusters Housing Allocations Plan

SA Report Update

June 2024

Quality information

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Non-technical summary

Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging South Norfolk Village Clusters Housing Allocations Plan (the Village Clusters Plan). The Village Clusters Plan, which is being developed alongside the Greater Norwich Local Plan (GNLP), aims to allocate smaller sites across Village Clusters (VCs) in South Norfolk (48 VCs have been identified in total), to accommodate at least 1,200 homes in total.

The key aim of any SA Report is to present an appraisal of “the plan and reasonable alternatives”, and a report presenting this information was published alongside the ‘publication’ version of the Village Clusters Plan in early 2023. Specifically, the plan and SA Report were ‘published’ in early 2023 under Regulation 19.

However, the Council is currently holding a further publication period on a Regulation 19 Addendum. The Addendum proposes changes to the plan following a Regulation 18 Focused Changes consultation in late 2023.

As such, the aim of this report is twofold:

- Present an appraisal of the Village Clusters Plan as a whole and reasonable alternatives, thereby superseding the information presented in the SA Report (early 2023).
- Present information tailored to informing representations on the current Regulation 19 Addendum. This means presenting an appraisal of the proposals set out in the Addendum, and reasonable alternatives.

In order to achieve this aim, this report is structured as per the SA Report (2023):

- Part 1 of this report presents information on reasonable alternatives.
- Part 2 presents an appraisal of the Village Clusters Plan as a whole, i.e. as previously published under Regulation 19 in early 2023 and then amended by the current Regulation 19 Addendum.

Overview of Part 1

The aim of Part 1 of the report is three-fold:

- 1) Explain reasons for selecting reasonable alternatives;
- 2) Present an appraisal of reasonable alternatives;
- 3) Present the Council's response to the appraisal, i.e. reasons for supporting the preferred option.

Selecting reasonable alternatives

The SA Report (2023) presented an appraisal of two reasonable alternatives:

- Option 1 – the emerging preferred approach; and
- Option 2 – an alternative approach with a greater emphasis on accessibility.

With regards to Option 2, it was not possible to define this strategy with precision. However, it was possible to identify village clusters that could potentially see higher or lower growth on accessibility grounds (also accounting for available site options / constraints affecting available site options) – see Table A.

It is also important to note that “accessibility” is not something that is easy to define. A key factor is the accessibility of the village cluster in question to a higher order settlement (accounting for both proximity and transport links). However, there is also a need to account for village cluster services and facilities and, in this regard, consider both: A) whether the site options in contention for allocation are within walking distance; and B) whether there is a clear case for growth (or allocation of one or more specific sites) in order to support or boost village services / facilities.

Table A: Village clusters flagged as potentially suited to lower/higher growth under Option 2 in 2023

Village cluster	Conclusion on <u>possible</u> alternatives to the emerging preferred approach
Alpington etc.	Lower growth as proposed brownfield site is separated from settlement
Aslacton etc.	Lower growth noting the increase to growth since the draft plan stage
Barford etc.	Higher growth given good links to Wymondham and Norwich

Village cluster	Conclusion on <u>possible</u> alternatives to the emerging preferred approach
Bawburgh	Higher growth given good proximity to Norwich
Bressingham	Higher growth given good proximity / reasonable links to Diss and adj. school
Brooke etc.	Higher growth (tentative) given good connectivity to Poringland
Bunwell	Lower growth as a rural village and both sites somewhat distant to a primary school
Ditchingham etc.	Higher growth given links to Bungay, adj. school and potential comprehensive scheme
Earsham	Higher growth (tentative) given good connectivity to Bungay
Gillingham etc.	Higher growth and focus of growth at Gillingham, given links to Beccles
Hales etc.	Higher growth (tentative) to deliver a comprehensive scheme and given links to Loddon
Hempnall etc.	Lower growth as Hempnall noting that Long Stratton is ~6.5km by car
Kirby Cane etc.	Lower growth as nearby villages (Ditchingham/Broome and Gillingham) are preferable
Little Melton etc.	Higher growth (strong argument) as very good proximity to Norwich and Hethersett
Mulbarton etc.	Higher growth involving a sole focus at Mulbarton (where the primary school is located)
Needham etc.	Lower growth as distant from both primary school and higher order centres
Rockland St M' etc.	Lower growth with a focus on the site that is less well connected to village facilities
Seething etc.	Lower growth given 900m to primary school, 4km to Loddon and limited bus service
Spooner Row	Higher growth (strong argument) given train station (albeit limited service)
Tacolneston etc.	Lower growth given distance to a higher order centre and limited bus service
Thurlton etc.	Lower growth given 10km to Loddon and limited bus service
Tivetshall etc.	Lower growth given 7km to a higher order settlement
Toft Monks etc.	Lower growth specifically involving no growth at Burgh St. Peter
Winfarthing etc.	Lower growth noting limited bus service, albeit Diss is only ~5km distant
Woodton etc.	Lower growth as rural albeit good bus service and growth would support the local school

Following the Regulation 19 publication stage in early 2023 the intention was to submit the Village Clusters Plan for examination in public. However, as it transpired, this was not possible because of issues at two sites leading to the loss of 30 homes supply, which dropped the total supply to just below the 1,200 homes target (as understood from the Greater Norwich Local Plan). As such, the decision was taken to 'boost' supply, which led to a targeted consultation under Regulation 18 in late 2023, with an Interim SA Report published as part of the consultation.

The Interim SA Report (late 2023) aimed to do three things:

- Introduce options for boosting supply – Section 3 of the report introduced 11 options, comprising one new site that had been submitted in 2023, five previously shortlisted sites that could be reconsidered for allocation, and five options for boosting supply at existing allocations (from the Regulation 19 plan, 2023). Also, at two further existing allocations the option for consultation involved an expanded site boundary but with no boost to capacity.
- Present an appraisal of the options for boosting supply – see Section 4 of the report.
- Draw conclusions – Section 5 highlighted some options as being associated with few draw-backs and, in some cases, notable benefits (beyond simply delivering new homes). Issues/constraints were flagged for a small number of the options under consideration, but no major concerns were raised.

Following the consultation the Council decided to take forward 8 of the 11 options for boosting supply (as well as the two options for expanding site boundaries without boosting supply).

Specifically, the proposed approach is to allocate three new sites (the *new* site submitted in 2023 and two previously shortlisted sites) and to boost capacity at five sites (which in four cases involves an extension to the site).

It is this proposed approach to boosting supply that is the focus of the Regulation 19 Addendum at the current time, and so there is a need to present an appraisal of reasonable alternatives to inform the consultation.

In turn, key questions are as follows:

- Do any of the proposed options for boosting supply give rise to particular concerns or challenges?
- Are there any other options for boosting supply that need be a focus of appraisal and ongoing consideration?

With regards to the first question, the answer is no, on balance. The appraisal conclusions set out in Section 5 of the Interim SA Report (late 2023) flagged certain issues/constraints with several of the sites, but these were all of limited or very limited significance. It is recognised that the proposed option for boosting supply at Barford (see Table B) generated a notably high degree of interest through the consultation in late 2023, but the site will deliver a replacement village hall and is supported in wider respects (albeit with a degree of landscape sensitivity).

With regards to the second question, the answer is yes. Specifically, it remains reasonable to keep in consideration the three options for boosting supply that were appraised and consulted upon at the Regulation 18 Focused Consultation stage in 2023, but which are not proposed to be taken forward at the current time. In each case these are omission sites (as opposed to options for boosting supply at an existing allocation) that have been examined as shortlisted sites across the course of the plan-making process. Specifically:

- SN0433 (Alpington; 1 ha; at least 12 homes)
- SN0552REVC (Barford; 0.73; up to 20 homes)
- SN0055 (Barnham Broom; 1 ha; approx. 15 homes)

The table below aims to summarise the latest situation. It is important to note that the table deals only with new proposed allocations, as opposed to existing allocations being rolled forward through the Village Clusters Plan.

Table B: Latest situation regarding the proposed approach at each village cluster (new allocations only)¹

Village cluster	Reg 19 Sites	Reg 19 homes	Reg 19 RA?	Max boost consulted on at Reg 18 (late 2023)	Current proposed change relative to previous Reg 19
Alpington etc	2	50	Lower	New site = 12 homes	-
Aslacton etc	2	47	Lower	-	-
Barford etc	1	19	Higher	New sites x2 = 50 homes	New site = 40 homes
Barnham Broom	1	40	-	New site = 15 homes	-
Bawburgh	1	35	Higher	-	-
Bressingham	1	40	Higher	-	-
Brooke etc.	1	50	Higher	-	-
Bunwell	2	35	Lower	-	-
Ditchingham etc	1	35	Higher	New site for 12 plus extended site for 10 = 22 homes	As per Reg 18
Earsham	1	24	Higher	New site = 25 homes	As per Reg 18
Gillingham etc	2	55	Higher	Extended site = 5 homes	As per Reg 18
Hales etc	1	35	Higher	-	-
Hempnall etc	1	15	Lower	-	-

¹ To reiterate, the table deals with new allocations only, and does not show supply from existing allocations being rolled forward through the Village Clusters Plan. Also, the table does not highlight two current proposed extensions to sites without any assumptions made regarding a boost to site capacity. These sites are located at Bawburgh and Tacolneston.

Village cluster	Reg 19 Sites	Reg 19 homes	Reg 19 RA?	Max boost consulted on at Reg 18 (late 2023)	Current proposed change relative to previous Reg 19
Kirby Cane etc	2	37	Lower	-	-
Little Melton etc	1	35	Higher	-	-
Mulbarton etc.	3	55	Higher	Increase capacity of existing site = 10 homes	As per Reg 18
Needham etc	2	27	Lower	-	-
Newton Flotman etc	1	25	-	-	-
Pulham Market etc	1	50	-	-	-
Rockland St M' etc.	2	50	Lower	Remove one site for 25 homes (access issues)	As per Reg 18
Seething etc.	1	12	Lower	-	-
Spooner Row	2	40	Higher	Extended site = 20 homes	As per Reg 18
Stoke Holy X etc	1	25	-	-	-
Tacolneston etc	1	21	Lower	-	-
Thurlton etc	2	22	Lower	-	-
Tivetshall etc	1	20	Lower	-	-
Toft Monks etc	2	47	Lower	-	-
Wicklewood	2	42	-	Extended site = 10 homes	As per Reg 18
Winfarthing etc	2	40	Lower	-	-
Woodton etc	1	50	Lower	-	-
Wrenington etc	1	15	-	-	-

In **conclusion**, it is challenging to define reasonable alternatives (RAs) at the current time.

However, on balance, Section 6 of the report presents an appraisal of **two sets of RAs**, namely:

- Two 'spatial strategy' alternatives as per those previously appraised and published in early 2023 (Regulation 19), namely: Option 1 – the emerging preferred approach; and Option 2 – greater emphasis on accessibility.
- The 11 options for boosting supply previously consulted on at the Regulation 18 stage in late 2023. These are the same options that were a focus of the ISA Report (late 2023), but appraisal findings have been updated.

Reasonable alternatives appraisal findings

Section 6 presents an appraisal of the two sets of reasonable alternatives introduced above. Each of the appraisals essentially involves considering the merits of the alternatives / options in question under the SA framework.

With regards to the **spatial strategy** alternatives, the appraisal findings are broadly as per those previously presented in the SA Report (early 2023). The first thing to say is that there is clear support for the emerging preferred strategy from a housing perspective, given the importance of meeting locally arising housing needs at villages / village clusters, including homes suited to younger people and families, and ensuring schemes that deliver a policy compliant level of affordable housing. With regards to 'accessibility' it is not possible to conclude a clear preference for Option 2 (greater level of accessibility), after accounting for various 'dimensions' of accessibility. However, it is fair to highlight support for Option 2 from a transport perspective; there specifically, there is a 'transport' case for a greater concentration of growth at settlements/locations with good connectivity to higher order settlements. It can also be suggested that an adjusted strategy with greater concentration of growth, and particular concentration close to higher order settlements and along transport corridors could have a degree of merit wider respects, including in respect of climate change mitigation, but these considerations are uncertain and marginal.

With regards to the options for **boosting supply** (recalling that this is the focus of the current Regulation 19 Addendum), the appraisal findings are broadly as per those previously presented in the Interim SA Report published as part of the Regulation 18 consultation on Focused Changes in late 2023):

- The new site option at Barford represents a significant change and generated a significant response through the consultation in late 2023. It is also noted that the decision has been taken to increase the capacity of the site since that time (from 30 homes to 40 homes). Care will need to be taken to ensure the new development relates to the existing village built form, whilst realising the key opportunity to deliver new community infrastructure, in particular a replacement village hall as part of a new village hub. It should also be noted that Barford effectively 'lost' its 2015 Local Plan allocation for ~10 homes as the site could not be delivered.
- With regards to options involving allocation of previously shortlisted omission sites, there are a number of sites associated with certain issues, although all are of limited significance. Specifically: the site at Broome performs relatively poorly from an immediate accessibility perspective (although the cluster and nearby Bungay provide a good range of services and facilities); the sites at Alington and Barford (B1108/Back Lane) are subject to a degree of landscape and/or historic environment constraint (and both generated notable interest through the consultation in late 2023); and at Earsham there is a need to consider the appropriate extent of the site boundary in order to avoid piecemeal growth leading to opportunities missed in terms of securing benefits to the village.
- There is support for a number of the options involving boosting supply from existing allocations from an accessibility perspective, and none of the options give rise to significant concerns in other respects. For example, the clusters in the Waveney Valley (Earsham, Gillingham etc. and Ditchingham etc.) have good access to higher order settlements at Bungay and Beccles. The Wicklewood option would need to be carefully considered from a landscape perspective (and did generate notable interest through the consultation in late 2023) and the Spooner Row option pushes the numbers in the village to the upper end of the range considered appropriate given the scope and objectives of the Village Clusters Plan.
- With regards to the total quantum of additional supply that should ultimately be supported, it is difficult to draw conclusions, but there is a clear need for a healthy 'buffer' over-and-above the required 1,200 homes figure, as a contingency for unforeseen delivery issues. Also, there is a need to recall that the 1,200 homes figure is a minimum figure that was established some time ago (and then explicitly tested through the GNLP Examination in Public), and there is generally a need to take a proactive approach to housing growth / meeting needs.

Selecting the preferred option

Section 7 of the report presents SNC officers' response to both of the appraisals.

With regards to **spatial strategy**, the view of officers is broadly unchanged from the equivalent statement presented within the SA Report (2023). Specifically, Option 1 is supported for the following reasons:

"The plan aims to strike a balance between directing growth to the most accessible village clusters, remaining mindful that it is right to attach importance to transport and climate change SA objectives, whilst also providing opportunities for residential development in a range of villages with more modest accessibility to services and facilities in relative terms. This reflects the larger and more dispersed rural geography of South Norfolk and attaches importance to wider plan objectives and sustainability topics that include meeting the need and demand for housing and supporting services across the rural area in order to maintain and enhance the vitality of rural communities. It is important to remember that the intention of allocating land for development within the Village Clusters, as set out in the GNLP, was to promote social sustainability supporting rural life and services.

Striking the correct balance between these different themes is not a straight-forward. However, in considering this balance it is critically important to remember that the Village Clusters Plan forms but one small element of the much larger Development Plan for Greater Norwich. This wider strategy is primarily contained in the Greater Norwich Local Plan, which primarily directs growth to Norwich and its built-up urban fringe, the Main Towns and the largest, and most accessible, villages. Therefore, when considered comprehensively it is the case that the emerging Development Plan has a very strong emphasis on placing growth in the most accessible locations.

To find an appropriate balance for the distribution of development within this context, the final selection of proposed allocations has been subject to an iterative process of adjusting and refining the plan. This has included significant adjustments made after the draft plan consultation (2021), subsequent adjustments over the period 2021-2022 including in light of detailed evidence workstreams, further adjustments in 2023 following the Regulation 19 publication stage and then final (very limited adjustments) in 2024 following consultation under Regulation 18 in late 2023. The appraisal is broadly supportive of the adjustments that have been made, and one key point to note is that the appraisal now concludes that the preferred approach performs broadly on a par with the reasonable alternative in terms of 'accessibility', in contrast to the appraisal finding in 2021.

Having said this, it is noted that the appraisal serves to highlight that the Village Clusters Plan still gives rise to tensions with certain sustainability objectives. It is also noted that the appraisal concludes broadly neutral effects in terms of a number of headings, instead of positive effects. This serves to highlight the importance of setting site-specific policy aimed at realising sustainability objectives, with the potential benefits of development maximised and negative effects minimised. However, it is recognised that, given the specific remit and objectives of the Village Clusters Plan, a degree of residual tension with certain sustainability objectives is inevitable.”

With regards to **boosting supply**, the view of officers is as follows:

“The preferred approach involves taking forward 8 of the 11 options for boosting supply consulted on in late 2023, namely all bar the options involving allocation of shortlisted omission sites at Alington, Barford and Barnham Broom. The combined effect is such that the total supply now identified through the Village Clusters Plan is comfortably in excess of the 1,200 home target, such that there is a ‘buffer’ that is considered to be of a suitable size to account unforeseen delivery issues. With regards to the supported options, the new proposed allocation at Barford generated a considerable response through consultation, and stands out in terms of quantum of growth, but the site will deliver a replacement village hall and wider community benefits. With regards to the three options not being taken forward, there is considered to be clear justification having accounted for both site-specific and village-specific factors. A key point to note is that all three of the villages in question are set to see significant growth under the proposed approach.”

Overview of Part 2

Part 2 of the report presents an appraisal of the current version of the plan as a whole – i.e. the plan as previously published under Regulation 19 in early 2023, plus the current focused changes presented within the Regulation 19 Addendum. Additionally, it takes steps to give stand-alone attention to the current focused changes.

The appraisal comprises a series of 12 narrative discussions – one for each component of the SA framework – where the aim of each discussion is to reach a conclusion on ‘significant effects’. The appraisal concludes:

- 1.1.1 Whilst the appraisal of reasonable spatial strategy alternatives (see above) predicts that the preferred strategy (Option 1) would lead to positive effects in respect of two sustainability topics, when taking account of the plan as a whole (i.e. the proposed strategy / package of allocations plus site-specific policy) it is possible to predict positive effects in respect of eight sustainability topics. This reflects the fact the plan presents very detailed and well-evidenced site-specific policies, including with a focus on avoiding/mitigating impacts to the local environment (including from a historic environment and landscape perspective) and village character.
- 1.1.2 There are several final points to make:
 - Accessibility – is a key sustainability topic / objective, with the merits of the emerging preferred strategy having been tested in considerable detail over the course of the plan-making process, including through the appraisal of reasonable alternatives. The conclusion is that the plan will result in ‘significant positive effects’, with this conclusion having been reached particularly mindful of: A) the changes that have been made to the plan since the draft plan stage and more recently; and B) highly detailed site specific policy covering a range of factors, including ensuring good potential to access village facilities and also realising opportunities for development to maintain and enhance village facilities. However, it remains the case that the plan does give rise to tensions with objectives around ensuring accessibility to higher order settlements.
 - Climate change mitigation – it is challenging to reach a conclusion on the effects of the Village Clusters Plan, including because there is a need to factor-in greenhouse gas emissions from both transport and the built environment. On balance, the appraisal of the proposed submission plan predicts ‘moderate or uncertain negative effects’, but this is quite a marginal conclusion, with there being an argument for instead predicting ‘neutral’ effects. The predicted negative effect aims to reflect the urgency of the issue.
 - Site specific policy – is strongly supported. A very wide range of key issues are reflected across the suite of site-specific policies, taken as a whole, but it is also the case that site-specific policy is suitably concise, with minimal repetition of text or discussion of ‘non-issues for completeness’. Bold text is used within the appraisal presented in Section 9 with a view to highlighting the breadth of issues covered by policy.
 - Iterations – a focus of the SA process has been on highlighting potential drawbacks to the emerging preferred approach, in respect of specific sustainability topics, with a view to potentially making adjustments to the plan, whether through spatial strategy / site selection or site specific policy. For example, the Interim SA Report (2021) included a considerable emphasis on aiming to allocate sites that make use of existing land parcels (typically agricultural fields) in full, or at least make good use of existing field boundaries, so as to avoid the

artificial subdivisions, and that recommendation has been actioned. There has been limited emphasis on formal recommendations, but one minor recommendation is made at the current time under 'Biodiversity'.

- Effect characteristics – the appraisal has not sought to give systematic consideration to effect characteristics such as 'short term versus long term' and 'direct effects versus indirect effects'. However the appraisal has been undertaken mindful of the need to consider the full range of potential effect characteristics. Most of the effects in question are 'long term', albeit there is also a need to be mindful of short term effects associated with the construction of housing sites. It is also important to note that some of the predicted effects of the plan are 'indirect'. In particular, whilst it is difficult to pinpoint that the proposed housing growth strategy (for any given village cluster) will *directly* have the effect of supporting the viability of village services and facilities, or more generally maintaining village vitality, there is confidence that there will be an *indirect* benefit (e.g. it is understood that many village schools currently rely on 'out of catchment' pupils to remain viable).
- Cumulative effects – the SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the plan in question in combination with other plans, programmes and projects. In practice, this is an opportunity to discuss potential long term and 'larger than local' effects. There are several points to raise:
 - Greater Norwich Local Plan (GNLP, 2024) – the Village Clusters Plan supports the GNLP spatial strategy, and no issues or tensions have been highlighted.
 - Broads Authority – there has been close consultation with the Broads Authority throughout the plan-making process, but it is anticipated that the forthcoming consultation stage will also provide an important opportunity for any further issues to be raised. The plan directs a notable quantum of growth to locations in relative proximity to the Broads, but a range of site specific policy is proposed to address any issues, most notably in terms of landscape impacts, and the quantum was reduced in 2023. Also, there is a need to support the vitality of Broads-edge villages and provide homes for those who work in the Broads.
 - Nutrient neutrality – is a key cross-border consideration, given the extent of sensitive river catchments. A discussion of this issue is presented in Section 5.2, including discussion of the County-wide mitigation strategy, and the detailed work that has been completed around WRC capacity.
 - Local Nature Recovery Strategies – are a requirement under the Environment Act 2021, including with a view to supporting a national Nature Recovery Network. There will likely be a need to focus attention on priority landscape that cross administrative boundaries, for example river corridors. Dispersing growth widely across smaller sites – as is a central objective of the Village Clusters Plan – potentially leads to challenges in respect of realising strategic biodiversity / nature recovery / nature network objectives, but the appraisal of the preferred spatial strategy raises few significant concerns, and important site-specific policy is proposed for sites associated with specific issues or opportunities.

Next steps

Part 3 of the report discusses next steps.

Plan finalisation

Once the period for representations has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan is 'sound'. Assuming that this is the case, the plan will be submitted for examination, alongside a summary of the main issues raised, the SA Report and other evidence.

At examination, one or more appointed Inspectors will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the plan, these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).

Once found to be 'sound' the Village Clusters Plan can be adopted by the Council. At that time a 'Statement' must be published that sets out certain information including 'the measures decided concerning monitoring'.

Monitoring

The current plan document proposes a number of monitoring indicators. In-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring might additionally focus on: area of greenspace delivered within sites; length of hedgerow lost; the nature, timing and (potentially) cost of Water Recycling Centre upgrades (and any unforeseen issues); delivery of new pedestrian footpaths (also homes delivered without connectivity to pedestrian footpaths); and (as a contextual indicator), the health of village services and facilities, perhaps most notably any capacity issues at primary schools. However, it is recognised that there are a range of pragmatic considerations that must influence the range of monitoring work that is undertaken.

1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging South Norfolk Village Clusters Housing Allocations Plan (the Village Clusters Plan). The Village Clusters Plan, which is being developed alongside the Greater Norwich Local Plan (GNLP), aims to allocate smaller sites across the rural parts of South Norfolk, with the aim of providing for at least 1,200 homes in total.
- 1.1.2 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for Local Plans.

1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2 In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that essentially appraises “the plan, and reasonable alternatives”.² The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions**:
- What has plan-making / SA involved **up to this point**?
 - including consideration of reasonable alternatives
 - What are the SA findings **at this stage**?
 - i.e. in relation to the draft plan
 - What are **next steps**?

1.3 This SA Report Update

- 1.3.1 At the current time the Council has published an Addendum to the Village Clusters Plan under Regulation 19 of the Local Planning Regulations. Specifically, the current Addendum deals with ‘focused changes’ to the Village Clusters Plan previously published under Regulation 19 in early 2023. As such, a key aim of this report is to inform representations on the current ‘Regulation 19 Addendum’.
- 1.3.2 However, there is also a need to consider that the intention subsequent to the publication period is to submit the Village Clusters Plan as a whole for Examination in Public (EiP), including the focused changes that are the subject of the current Regulation 19 Addendum. The SA Report must be published alongside, hence the other aim of this report is to update SA Report as previously published in early 2023.
- 1.3.3 In summary, the aim of this report is twofold:
- Present an appraisal of the Village Clusters Plan as a whole and reasonable alternatives, thereby superseding the information presented in the SA Report (early 2023).
 - Present information tailored to informing representations on the current Regulation 19 Addendum. This means presenting an appraisal of the proposals set out in the Addendum, and reasonable alternatives.
- 1.3.4 In order to achieve this aim, this report is structured as per the SA Report (2023):
- Part 1 of this report presents information on reasonable alternatives.
 - Part 2 presents an appraisal of the Village Clusters Plan as a whole, i.e. as previously published under Regulation 19 in early 2023 and then amended by the current Regulation 19 Addendum.
- 1.3.5 Firstly, there is a need to further set the scene by introducing: the plan scope; and the SA scope.

² Regulation 12(2) of the SEA Regulations

2 The plan scope

2.1 Overview

- 2.1.1 The Village Clusters Plan is being prepared in the context of the Greater Norwich Local Plan (GNLP, 2024) and aims to provide for new homes across the more rural parts of South Norfolk. More specifically, the aim is to allocate a series of smaller sites, typically between 12 to 50 homes, across the Village Clusters (48 have been identified), in order to provide for at least 1,200 homes in total.
- 2.1.2 The Plan will also define expanded Settlement Limits for the villages within these clusters, within which planning policies will apply that are relatively supportive of new development (subject to the usual planning considerations such as access, amenity, landscaping).
- 2.1.3 As well as the GNLP, important context comes from paragraph 83 of the National Planning Policy Framework (NPPF), which encourages local authorities to *“identify opportunities for villages to grow and thrive, especially where this will support local services.”* Paragraph 83 also explains: *“Where there are groups of smaller settlements, development in one village may support services in a village nearby.”*
- 2.1.4 Further national context comes from paragraph 70 of the NPPF, which notes the importance of small and medium sized sites, up to 1 hectare in size, in contributing to meeting housing needs, particularly in terms of the ability to deliver those sites quickly. This paragraph also encourages local plans which support windfall development on non-allocated sites (e.g. within Settlement Limits).
- 2.1.5 With regards to the GNLP, this primarily focuses growth at Norwich, the Norwich fringe and other higher order settlements, but also supports smaller sites in village clusters, to support small-scale builders, provide choice for the market and to deliver housing in popular village locations. The GNLP assigns 5.5% of the overall GNLP growth to the Village Clusters in South Norfolk and the rate of proposed growth in the Village Clusters is slower than that other tiers of the Settlement Hierarchy.
- 2.1.6 Of the growth assigned to the Village Clusters Plan by the GNLP, around half has either already been built since the start of the plan period (2018) or is set to come forward on sites which already have planning permission or are allocated in the current South Norfolk Site Specific Allocations and Policies (2015).³ Therefore, the Village Clusters Plan needs to identify sites for at least 1,200 new homes.

2.2 Village clusters

- 2.2.1 There are 48 Village Clusters in South Norfolk. Some contain a single parish, whilst others contain multiple parishes. In line with the approach set out in the GNLP, each one is centred around the local primary school. Where that primary school is within a larger settlement that is covered by the GNLP, the remaining rural parishes still form a cluster in the Village Clusters Plan e.g. Brockdish, Needham, Wortwell and Startson are within the catchment of Harleston primary school, but those four parishes form a cluster in the Village Clusters Plan. Primary school catchments are taken as a proxy for social sustainability; however, the Council recognises that many other facilities are important to local communities and has also undertaken an audit of other facilities and services within the clusters, to inform site selection.
- 2.2.2 New housing sites within village clusters will comprise:
- Allocations - these are sites proposed for between 12 to 50 homes, which will contribute towards meeting the 1,200 home requirement in the GNLP, noted above; and
 - Anticipated windfall sites within Settlement Limit Extensions – these sites will not count towards the 1,200 dwelling requirement but will help ensure that the ‘windfall allowance’ in the GNLP is achieved; these will be small sites suited to delivering up to 11 homes, although they are generally smaller.
- 2.2.3 The threshold of 12 dwellings is consistent with the GNLP and reflects the fact that sites smaller than this are less likely to achieve the required element of affordable housing. Settlement Limit Extensions offer the opportunity for ‘self-build’ development, as encouraged through Government policy, particularly where those sites have been proposed by the site owner who wishes to build or commission their own home.

³ All bar two of those 2015 Local Plan allocations are proposed to be carried forward into the Village Clusters Plan.

2.3 Neighbourhood Plans

- 2.3.1 Some Town and Parish Councils have, and are continuing to, produce Neighbourhood Plans which sit alongside the Local Plan and, once adopted (or 'made'), are also used to determine planning applications. Most of these Neighbourhood Plans include more detailed development management policies, which aim to shape development proposals to better reflect local circumstances; however, there is also the potential to allocate sites for development through Neighbourhood Plans.
- 2.3.2 Two Neighbourhood Plans - Diss and District (which covers Diss, Burston, Roydon and Scole) and Dickleburgh – have made or are making allocations instead of allocations being made through the Village Clusters Plan. Housing growth targets for these two Neighbourhood Plans were provided by SNC.

2.4 Plan objectives

- 2.4.1 The Council has defined the following three headline objectives:
- **Meet housing needs** - Deliver housing in accordance with the GNLP housing target for the South Norfolk Village Clusters through the allocation of suitable, viable and deliverable development sites for housing. Provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of their life cycle e.g. first time buyers, those seeking family housing and those looking to downsize or move to more suitable accommodation in later life. Provide opportunities for 'self-builds' through the extension or amendment of settlement boundaries to allow 'in-fill' development in appropriate locations.
 - **Protecting village communities and support rural services and facilities** - Provide opportunities for new housing development in a range of settlements within the village clusters, meeting the needs of a range of occupiers with the potential to support different local services and facilities. Seek to deliver improvements to local services, facilities and infrastructure where justified and appropriate.
 - **Protect the character of villages and their settings** - Ensure that the scale, location and density of housing is well related to the form and character of existing villages, protects the historic environment, including protected landscapes, and ensures appropriate landscaping measures are delivered as part of new development.

3 What is the scope of the SA?

3.1 Introduction

- 3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the appraisal of reasonable alternatives and the emerging plan (it does not refer to the scope of reasonable alternatives, which is a separate matter, and a focus of discussion below, within Part 1).
- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA, with further information presented within Appendix II and within a stand-alone Scoping Report.
- 3.1.3 However, it is not possible to define the scope of the SA comprehensively; rather, there is a need for the SA scope to be flexible, responding to the emerging plan / plan options and the latest evidence base.

3.2 Consultation on the scope

- 3.2.1 The Regulations require that: "When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the IIA 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 on the SA scope in 2020, via publication of a Scoping Report, which was subsequently updated to reflect consultation responses received.

⁴ In-line with Article 6(3) of the SEA Directive, these bodies were selected because 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.'

3.3 The SA framework

3.3.1 Table 3.1 presents the list of topics/objectives that represents the core of the SA framework.

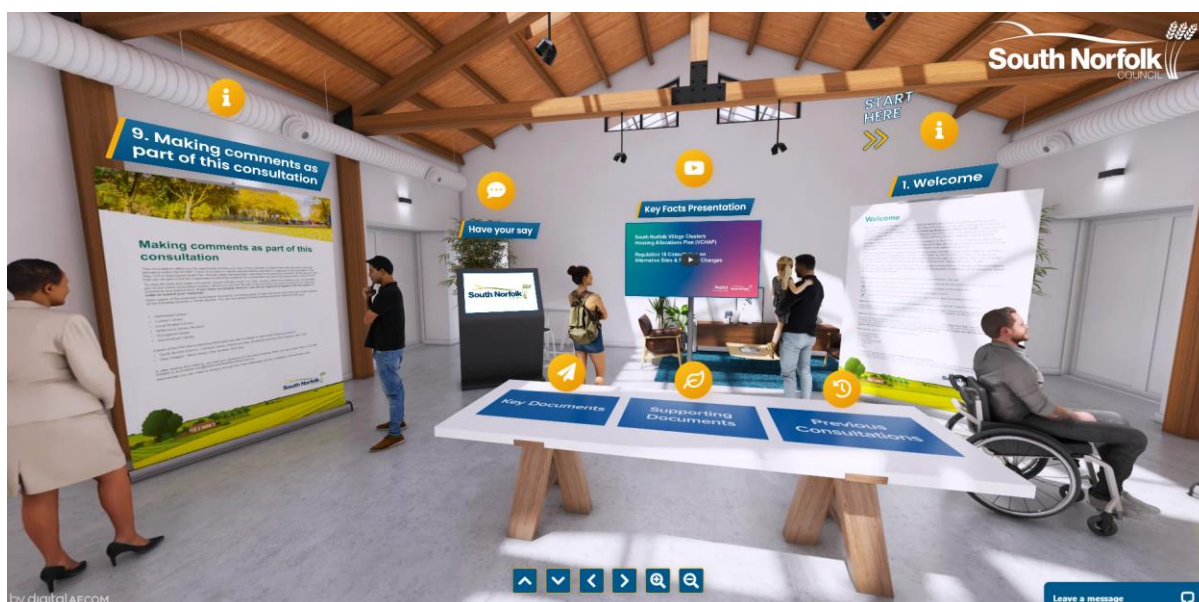
Table 3.1: The SA framework

Topic	Objective
Accessibility	Support good access to existing and planned services, facilities and community infrastructure, including green infrastructure, for new and existing residents, being mindful of the potential for community needs to change over time.
Biodiversity	Avoid harm to South Norfolk's rich diversity of internationally, nationally and locally designated sites of biodiversity significance, as well as to sites in adjacent Local Plan areas, whilst seeking to deliver a biodiversity net gain and enhancement of habitats and habitat connectivity in all but exceptional cases.
Climate change adaptation	Support the resilience of South Norfolk to the potential effects of climate change, including by directing development away from areas at greatest risk of fluvial and surface water flooding.
Climate change mitigation	Continue to reduce CO ₂ emissions from all sources by achieving high standards of energy efficiency in new development, by supporting decentralised energy generation, by providing attractive opportunities for sustainable travel, by locating residential development a short distance from key services and by protecting land suitable for renewable and low carbon energy generation, including community schemes, whilst recognising the changing nature of private cars with the Government's current aim of phasing out all sales of internal combustion engine cars within the lifetime of this plan.
Communities	Support the continued healthy and sustainable growth of South Norfolk, narrowing the gap between the areas of the District with strongest and least strong health and social outcomes. Helping to maintain local services and facilitates in more rural locations, to the benefit of existing and future residents.
Economy	Support the continued provision of, and vitality of, local employment opportunities across the District whilst seeking to take advantage where possible of new strategic opportunities, such as those associated with the Cambridge Norwich Tech Corridor. To support a range of housebuilding opportunities, particularly for small and medium sized builders.
Historic environment	Protect, conserve and enhance designated, non-designated and as-yet undiscovered heritage assets and their settings, and contribute to maintaining and enhancing South Norfolk's historic character through the design, layout and setting of new development.
Housing	Support timely delivery of an appropriate mix of housing types and tenures to ensure supply of high-quality housing across the village clusters which meets the needs of South Norfolk residents and diversify the housing market to help maintain delivery.
Land and soils	Ensure the efficient and effective use of land by avoiding unnecessary development on 'best and most versatile' agricultural land and maintaining the integrity of mineral extraction sites and safeguarding areas.
Landscape	Protect and enhance the character, quality and diversity of the District's rural landscapes, townscapes and defined River Valleys through the appropriate design and layout of new development, including protecting the setting of The Broads Authority areas.
Transport	Ensure that provision of transport infrastructure reflects local population and demographic needs within and between the village clusters, promotes sustainable modes of travel, connects new housing to employment, education, health and local services and maximises accessibility for all.
Water	Promote sustainable forms of development which minimise pressure on water resources, whilst maintaining and enhancing where possible the quality of the District's rivers, lakes and other water bodies.

Part 1: What has plan-making / IIA involved up to this stage?

4 Introduction to Part 1

- 4.1.1 Plan-making has been underway since 2020, with three formal consultations/publications prior to this current stage (publication of Regulation 19 Addendum), and three formal SA reports have been published.
- 4.1.2 The focus here, within Part 1, is not to relay the entire 'backstory' of the plan-making /SA process, or to provide a comprehensive audit trail of decision-making over time. Rather, the aim is to report work undertaken to examine **reasonable alternatives**.
- 4.1.3 Specifically, the aim is to:
- Introduce the reasonable alternatives - see **Section 5**
 - Appraise the reasonable alternatives - see **Section 6**
 - Explain the Council's reasons for supporting the preferred approach - see **Section 7**
- 4.1.4 Presenting this information is in accordance with the requirement to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with' within the SA Report.



- 4.1.5 There have been three formal consultations prior to the current stage, plus several informal interim steps

5 Defining reasonable alternatives

- 5.1.1 The SA Report (early 2023) presented an appraisal of two reasonable alternatives:
- Option 1 – the emerging preferred approach; and
 - Option 2 – an alternative approach with a greater emphasis on accessibility.
- 5.1.2 With regards to Option 2, it was not possible to define this precisely. However, it was possible to identify village clusters that could potentially see higher / lower growth on accessibility grounds (also accounting for available site options and constraints affecting the available site options) – see Table 5.1.
- 5.1.3 The reasons for defining these two reasonable alternatives were set out within Section 5 of the SA Report; specifically, Section 5 of the SA Report explained a *process* that led to definition of the two alternatives.
- 5.1.4 That process need not be explained in full at the current time. However, it is appropriate to report here on two steps in the process, namely: 1) GIS analysis of all site options (see **Appendix III**); and discussion of each village cluster in turn, accounting for both strategic and site-specific factors / site options, leading to a conclusion on whether there is an 'accessibility' case for higher or lower growth (see **Appendix IV**).

- 5.1.5 It is also important to note the two alternatives were defined in the knowledge that “accessibility” is itself not something that is easy to define. A key factor is the accessibility of the village cluster in question to a higher order settlement (accounting for both proximity and transport links). However, there is also a need to account for village cluster services and facilities and, in this regard, consider both: A) whether the site options in contention for allocation are within walking distance; and B) whether there is a clear case for growth (or allocation of one or more specific sites) in order to support or boost village services / facilities.
- 5.1.6 Finally, it should be noted that account was also taken of whether there are sites reasonably in contention (taking account of wider factors, beyond just accessibility) to deliver a higher growth scenario

Table 5.1: Village clusters flagged as potentially suited to lower/higher growth under Option 2 in 2023

Village cluster	Conclusion on <u>possible</u> alternatives to the emerging preferred approach
Alpington etc.	Lower growth as proposed brownfield site is separated from settlement
Aslacton etc.	Lower growth noting the increase to growth since the draft plan stage
Barford etc.	Higher growth given good links to Wymondham and Norwich
Bawburgh	Higher growth given good proximity to Norwich
Bressingham	Higher growth given good proximity / reasonable links to Diss and adj. school
Brooke etc.	Higher growth (tentative) given good connectivity to Poringland
Bunwell	Lower growth as a rural village and both sites somewhat distant to a primary school
Ditchingham etc.	Higher growth given links to Bungay, adj. school and potential comprehensive scheme
Earsham	Higher growth (tentative) given good connectivity to Bungay
Gillingham etc.	Higher growth and focus of growth at Gillingham, given links to Beccles
Hales etc.	Higher growth (tentative) to deliver a comprehensive scheme and given links to Loddon
Hempnall etc.	Lower growth as Hempnall noting that Long Stratton is ~6.5km by car
Kirby Cane etc.	Lower growth as nearby villages (Ditchingham/Broome and Gillingham) are preferable
Little Melton etc.	Higher growth (strong argument) as very good proximity to Norwich and Hethersett
Mulbarton etc.	Higher growth involving a sole focus at Mulbarton (where the primary school is located)
Needham etc.	Lower growth as distant from both primary school and higher order centres
Rockland St M' etc.	Lower growth with a focus on the site that is less well connected to village facilities
Seething etc.	Lower growth given 900m to primary school, 4km to Loddon and limited bus service
Spooner Row	Higher growth (strong argument) given train station (albeit limited service)
Tacolneston etc.	Lower growth given distance to a higher order centre and limited bus service
Thurlton etc.	Lower growth given 10km to Loddon and limited bus service
Tivetshall etc.	Lower growth given 7km to a higher order settlement
Toft Monks etc.	Lower growth specifically involving no growth at Burgh St. Peter
Winfarthing etc.	Lower growth noting limited bus service, albeit Diss is only ~5km distant
Woodton etc.	Lower growth as rural albeit good bus service and growth would support the local school

- 5.1.7 Section 6 of the SA Report (early 2023) presented an appraisal of the two reasonable alternatives, and then Section 7 presented the Council's reasons for taking forward the preferred approach (Option 1), i.e. not supporting the alternative strategy involving a greater emphasis on accessibility (Option 2).
- 5.1.8 Subsequent to publication of the Proposed Submission Village Clusters Plan and SA Report under Regulation 19 of the Local Planning Regulations in early 2023 the intention was to submit the Village Clusters Plan for examination in public.
- 5.1.9 However, as it transpired, this was not possible because of issues at two sites leading to the loss of 30 homes supply, which dropped the total supply to just below the 1,200 homes target (as understood from the GNLP). Specifically, a site at Rockland St Mary had to be removed from the plan due to site access issues, and the decision was also taken to decrease the capacity of an existing allocation (being 'rolled forward' through the Village Clusters Plan) by five homes to account for historic environment constraints.
- 5.1.10 The decision was taken to 'boost' supply, which then triggered the need for a consultation on Focused Changes under Regulation 18 in late 2023, with an Interim SA Report published as part of the consultation.
- 5.1.11 The Interim SA Report (late 2023) aimed to do three things:
- Introduce options for boosting supply – Section 3 of the report introduced 11 options, comprising one new site that had been submitted in 2023, five previously shortlisted sites that could be reconsidered for allocation, and five options for boosting supply at existing allocations (from the previous Reg 19 stage). Also, at two further existing allocations the option for consultation involved an expanded site boundary but with no capacity boost. Section 3 of the ISA Report is presented here as **Appendix V** (and updated).
 - Present an appraisal of the options for boosting supply – see Section 4 of the report.
 - Draw conclusions – Section 5 highlighted some options as being associated with few drawbacks and, in some cases, notable benefits (beyond simply delivering new homes). Issues/constraints were flagged for a small number of the options under consideration, but no major concerns were raised.
- 5.1.12 Following the consultation the Council decided to take forward 8 of the 11 options for boosting supply (as well as the two options for expanding site boundaries without boosting supply).
- 5.1.13 Specifically, the proposed approach is to allocate three new sites (the *new* site submitted in 2023 and two previously shortlisted sites) and to boost capacity at five sites (in four cases involving an extension to the site).
- 5.1.14 It is this proposed approach to boosting supply that is the focus of the current Regulation 19 Addendum, and so there is a need to present an appraisal of reasonable alternatives in order to inform representations.
- 5.1.15 In turn, key questions are as follows:
- Do any of the proposed options for boosting supply give rise to particular concerns or challenges?
 - Are there any other 'supply boost' options that need be a focus of appraisal and ongoing consideration?
- 5.1.16 With regards to the first question, the answer is no, on balance. The appraisal set out in Section 5 of the ISA Report (early 2023) flagged certain issues with several of the sites, but these were all of limited significance. It is recognised that the proposed option for boosting supply at Barford (see Table 5.2) generated a notably high degree of interest through the consultation in late 2023, but the site will deliver a replacement village hall and is supported in wider respects (albeit with a degree of landscape sensitivity).
- 5.1.17 With regards to the second question, the answer is yes. Specifically, it remains reasonable to keep in consideration the three options for boosting supply that were appraised and consulted upon at the Regulation 18 Focused Changes stage in early 2023, but which are not proposed to be taken forward.
- 5.1.18 In each case these are omission sites (as opposed to options for boosting supply at an existing allocation) that have been examined as shortlisted sites across the course of the plan-making process. Specifically:
- SN0433 (Alpington; 1 ha; at least 12 homes)
 - SN0552REVC (Barford; 0.73; up to 20 homes)
 - SN0055 (Barnham Broom; 1 ha; approx. 15 homes)

5.1.19 The table below aims to summarise the latest situation. N.B. the table deals only with new proposed allocations, as opposed to existing allocations being rolled forward through the Village Clusters Plan.

Table 5.2: Latest situation regarding the proposed approach at each village cluster (new allocations only)⁵

Village cluster	Reg 19 Sites	Reg 19 homes	Reg 19 RA?	Max boost consulted on at Reg 18 (late 2023)	Current proposed change relative to previous Reg 19
Alpington etc	2	50	Lower	New site = 12 homes	-
Aslacton etc	2	47	Lower	-	-
Barford etc	1	19	Higher	New sites x2 = 50 homes	New site = 40 homes
Barnham Broom	1	40	-	New site = 15 homes	-
Bawburgh	1	35	Higher	-	-
Bressingham	1	40	Higher	-	-
Brooke etc.	1	50	Higher	-	-
Bunwell	2	35	Lower	-	-
Ditchingham etc	1	35	Higher	New site for 12 plus extended site for 10 = 22 homes	As per Reg 18
Earsham	1	24	Higher	New site = 25 homes	As per Reg 18
Gillingham etc	2	55	Higher	Extended site = 5 homes	As per Reg 18
Hales etc	1	35	Higher	-	-
Hempnall etc	1	15	Lower	-	-
Kirby Cane etc	2	37	Lower	-	-
Little Melton etc	1	35	Higher	-	-
Mulbarton etc.	3	55	Higher	Increase capacity of existing site = 10 homes	As per Reg 18
Needham etc	2	27	Lower	-	-
Newton Flotman etc	1	25	-	-	-
Pulham Market etc	1	50	-	-	-
Rockland St M' etc.	2	50	Lower	Remove one site for 25 homes (access issues)	As per Reg 18
Seething etc.	1	12	Lower	-	-
Spooner Row	2	40	Higher	Extended site = 20 homes	As per Reg 18
Stoke Holy X etc	1	25	-	-	-
Tacolneston etc	1	21	Lower	-	-
Thurlton etc	2	22	Lower	-	-
Tivetshall etc	1	20	Lower	-	-
Toft Monks etc	2	47	Lower	-	-
Wicklewood	2	42	-	Extended site = 10 homes	As per Reg 18
Winfarthing etc	2	40	Lower	-	-
Woodton etc	1	50	Lower	-	-
Wrenington etc	1	15	-	-	-

⁵ To reiterate, the table deals with new allocations only, and does not show supply from existing allocations being rolled forward through the Village Clusters Plan. Also, the table does not highlight two current proposed extensions without a 'supply boost'.

- 5.1.20 In light of Table 5.2, there is a need to adjust understanding of those village clusters where there is a case for higher or lower growth on accessibility grounds, i.e. adjust the understanding set out in Table 5.1.
- 5.1.21 In particular, at four village clusters (Barford, Ditchingham, Earsham, Spooner Row), whilst the conclusion in early 2023 was that these settlements are potentially suited to higher growth (on accessibility grounds), it is now less clear that is the case, having accounted for current proposed supply 'boosts' (see the final column in Table 5.2), which in each case is quite significant. Also, at Rockland St Mary, whilst the conclusion in early 2023 was that there was a case for lower growth, it is now less clear that is the case, given that one of the two previously proposed allocations is now removed from the plan.
- 5.1.22 In **conclusion**, it is challenging to define reasonable alternatives (RAs) at the current time.
- 5.1.23 However, on balance, Section 6 presents an appraisal of **two sets of RAs**, namely:
- Two 'spatial strategy' alternatives as per those that were previously a focus of the SA Report published under Regulation 19 in early 2023, namely:
 - Option 1 – the emerging preferred approach; and
 - Option 2 – greater emphasis on accessibility.
 - The 11 options for boosting supply previously consulted on under Regulation 18 in late 2023, i.e. the same options that were a focus of the ISA Report (late 2023), albeit work is updated at the current time.

6 Alternatives appraisal

6.1 Introduction

- 6.1.1 This section presents an appraisal of the two sets of reasonable alternatives introduced above.

6.2 Spatial strategy alternatives

Introduction

- 6.2.1 To reiterate, the two options are as follows (and an explanation of the process leading to the two options is set out in Section 5 supplemented by information in Appendix III and Appendix IV):
- Option 1 – the emerging preferred approach (to allocation through the Village Clusters Plan); and
 - Option 2 – an alternative approach with a greater emphasis on accessibility.
- 6.2.2 The appraisal is broadly as per that which was a focus of Section 6 within the SA Report published at the Regulation 19 stage in early 2023. It is recognised that this appraisal is of limited relevance to the current Regulation 19 Addendum stage, which specifically deals with Focused Changes, but this appraisal is of relevance to the forthcoming Examination.

Methodology

- 6.2.3 The appraisal is presented under 12 headings – one for each of the topics that together comprise the SA framework – before a final section presents conclusions, including a summary appraisal matrix. Under each heading, the aim is to:
- 1) rank the scenarios in order of performance; and then
 - 2) categorise their performance in terms of 'significant effects' using red / amber / light green / green.⁶
- 6.2.4 Further points to note on methodology are as follows:

⁶ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

- A focus on certain village clusters – a primary focus of the appraisal here is on the village clusters listed in Table 5.1, namely those where there is considered to be a strategic choice in respect of growth strategy, i.e. there is a case for supporting lower or higher growth on accessibility grounds. However, the ‘constant’ village clusters are taken into account when reaching conclusions on significant effects. Constant village clusters are then a focus of appraisal in Section 9 of this report.
- Assumptions – there is a need to make a range of assumptions, e.g. around the nature of schemes that would come forward, infrastructure delivery etc. The appraisal aims to strike a balance between exploring and explaining assumptions on the one hand whilst, on the other hand, ensuring conciseness.
- Further discussion of appraisal methodology is presented in Section 8.

Accessibility

Objective: Support good access to existing and planned services, facilities and community infrastructure, including green infrastructure, for new and existing residents, mindful of community needs changing over time.

Option 1 The emerging preferred approach	Option 2 Increased emphasis on accessibility
=	=

- 6.2.5 The question of which of the two alternatives is preferable from an ‘accessibility’ perspective is not as clear cut as might intuitively be thought to be the case, given the need to factor-in dimensions of accessibility:
- accessibility to a higher order settlement (e.g. with a secondary school and GP surgery);
 - accessibility to village services / facilities (most importantly a primary school); and
 - The need to support the viability of, and potentially enhance, existing village services / facilities.
- 6.2.6 There is also a need to consider the context of the plan-making process over time, as introduced in Sections 4 and 5. In particular, it is important to note that the emerging preferred approach (Option 1) has incrementally evolved to a point where there is an increased focus on better connected villages, and also concentration at fewer larger sites, relative to the draft plan stage.
- 6.2.7 As such, there is a need to question whether a move to an alternative strategy with a *further* increased emphasis on accessibility – along the lines of the alternative strategy suggested in Table 5.3, to include a bias towards supporting better connected village clusters – might have significant negative implications for one of the dimensions of accessibility introduced above.
- 6.2.8 Specifically, the concern is that Option 2 could lead to a situation whereby certain village clusters are faced with insufficient patronage of the local services and facilities, perhaps most notably the local primary school, but also shops, post offices and pubs, plus there is a need to consider the viability of services offered at local village halls, such as for pre-school children.
- 6.2.9 Whilst it is not possible to pinpoint specific services or facilities that might be at risk of being lost (or being forced to offer a reduced service), it is possible to identify primary schools that are associated with notably small villages / notably rural areas (e.g. Seething), plus there are some instances where growth under Option 1 would directly support the functioning of the local primary school (e.g. Aslacton and Woodton).
- 6.2.10 Also, it is generally understood that the viability of primary schools is becoming more of an issue nationally, as rural populations age and given declining birth rates over the past decade (see ONS data [here](#)). Furthermore, there is a need to consider that many of the Village Cluster schools currently have a relatively high proportion of ‘out of catchment’ children from larger settlements, which may reduce as new primary schools are delivered in places such as Hethersett, Wymondham and Trowse.
- 6.2.11 Having said this, the discussion in Appendix III highlights a wide range of potential village cluster-specific arguments for departing from the emerging preferred approach in order to ensure a greater focus on:
- Proximity to a higher order settlement – perhaps most notably those villages that are in relatively close proximity to Norwich. Swardeston is one such village but is notable for the fact that there is not a primary school at the village, with the local school instead located at Mulbarton. Ditchingham and Gillingham are also notable as villages closely linked to Bungay and Beccles respectively.

- Villages that are distant from a higher order settlement, but with relatively good transport connectivity – Spooner Row stands-out on account of theoretical rail connectivity, albeit there is a very limited service, and there is not thought to be any potential for an improved service, in the context of the current plan. The village is also close to the A11, but regular bus services do not pass through the village.
- Villages that share transport corridors such that coordinated growth might feasibly support an enhanced bus service – whilst there may be no realistic potential in practice, possible growth corridors to the west and southwest of Norwich can be identified, on the basis of the discussions presented in Appendix III.
- Sites well located in terms of the ability to easily walk to local services and facilities – for example, the discussion presented in Appendix III serves to highlight the possibility of nil growth at Bergh Apton (leaving one allocation for 25 homes within the Alington VC) and higher growth at Bressingham.
- More comprehensive growth to secure new / upgraded community infrastructure – mindful of several instances of piecemeal village expansion sites (including recent and committed), as highlighted Appendix III, which risk sub-optimal outcomes in terms of securing developer funding for infrastructure.

However, it is difficult to pinpoint opportunities, with the emerging preferred approach already set to realise several opportunities, including in response to consultation and wider stakeholder engagement.

Spooner Row is one example of a village where the potential for higher growth to consolidate the built form, and potentially deliver on place-making objectives, might be envisaged. However, this is highly uncertain, as there is a need to give weight to protecting the existing character of the settlement, which is clearly associated with open spaces between groups of dwellings. Also, it is important to note that the latest proposal (2024) is to expand one of the allocations (see further discussion in Section 6.3).

Swardeston is a village where, in theory, growth to deliver a primary school might be an ambition, but this is not thought to be a realistic possibility in practice, in the context of the Village Clusters Plan.

- 6.2.12 In **conclusion**, whilst the equivalent appraisal of reasonable alternatives presented within the Interim SA Report (2021, prior to the initial Regulation 18 consultation) concluded a preference for an alternative to the emerging preferred strategy at that time, at the current time it is not possible to differentiate between the alternatives with confidence. It is ultimately very challenging to strike an appropriate balance between the various dimensions of accessibility but striking that balance has clearly been a focus of plan-making over the course of the preparing the VCHAP.
- 6.2.13 With regards to significant effects, it is considered appropriate to predict **moderate or uncertain positive effects** under both scenarios. This is in the knowledge that the baseline situation is not likely to be one whereby the ~1,200 homes in question are instead brought forward as part of strategic scale schemes with stronger accessibility credentials. Rather, the baseline situation could well be one whereby, in the absence of a Village Clusters Plan, new homes are brought forward in a relatively uncoordinated way across small and medium-sized sites, due to the lack of a Plan which delivers on the GNLP requirement.
- 6.2.14 This conclusion is unchanged from the SA Report (early 2023).

Biodiversity

Objective: Avoid harm to South Norfolk's rich diversity of internationally, nationally and locally designated sites of biodiversity significance, as well as harm to such sites in adjacent Local Plan areas, whilst seeking to deliver a biodiversity net gain and habitat enhancement where possible

Option 1 The emerging preferred approach	Option 2 Increased emphasis on accessibility
2	

- 6.2.15 A key strategic biodiversity sensitivity is in relation to the internationally designated sites associated with the Broads, namely the Broadland Special Protection Area (SPA) and the Broads Special Area of Conservation (SAC) and Ramsar site. The Broads define northeast (River Yare) and southeast (River Waveney) extents of the district. Matters are explored through a stand-alone Habitats Regulations Assessment (HRA), but growth locations for consideration (i.e. ones that are a variable) include:

- A146 corridor – connects the east of Norwich to Loddon and Beccles. Between the road corridor and the Broads (the north / east) is a rural landscape associated with some notable village clusters.

Most notable amongst these is Rockland St. Mary, where the SA Report (2023) highlighted the possibility of considering lower growth, from an accessibility perspective (also noting that the proposed allocation that is less preferable, from an accessibility perspective, is in close proximity to the SPA/SAC). Subsequently, the site further from the Broads was deleted from the plan (which triggered the need for further work in 2023 to boost supply, as discussed above).

Thurlton is another rural village closely associated with the Broads, but there are not any internationally (or nationally) designated sites nearby (albeit much priority habitat). Burgh St. Peter is another village subject to a degree of constraint.

Overall, there could possibly be an argument for focusing growth along the road corridor itself, e.g. at Hales (also Thurton, but no sites have been shortlisted at Thurton) with a view to a focus on better connected villages and also shifting the focus of growth away from the River Yare corridor.

- A143 / A146 corridor – is associated with the River Waveney corridor. The discussion in Appendix III serves to identify Ditchingham and Gillingham as villages along this corridor that are well-connected to a higher order settlement (Bungay and Beccles respectively); however, both villages are notably constrained in biodiversity terms. Specifically, Gillingham is in quite close proximity to two components of the Broads SAC, whilst Ditchingham / Broome is closely associated with Broome Heath, which is locally designated as a County Wildlife Site, and potentially sensitive as a highly accessible heathland.

- 6.2.16 Looking more widely across the district, it is difficult to identify clear arguments for or against following an alternative approach with an increased focus on accessibility. There are three further SACs - the Waveney & Little Ouse Valley Fens SAC, just beyond the south western boundary of the district, the River Wensum SAC in the far north and the Norfolk Valley Fens SAC, which is located centrally within the district – however, there appears to be relatively limited potential for impact pathways between these SACs and potentially variable growth locations.
- 6.2.17 One matter for consideration is the series of village clusters within fairly close proximity to Flordon Common, which forms a component of the Norfolk Valley Fens SAC. However, the majority of nearby villages are not ‘flagged’ in Table 5.3 as a potential variable (namely Thaston / Flordon / Hapton, Wreningham / Ashwellthorpe, Newton Flotman and Tasburgh). Mulbarton is the only nearby village (circa 2km to the north of the SAC) flagged as potentially suited to higher growth.
- 6.2.18 There are two further considerations, mindful of Policy 7.4 (Village Clusters) of the GNLP, which sets out a need for village clusters growth to deliver “*enhancements to the multi-functional green infrastructure network*” in order to “*contribute to the strategic network*”.
- 6.2.19 Firstly, there is the possibility of concentrating growth along river corridors, which invariably also correlate closely with transport corridors, with a view to supporting targeted enhancements, potentially to include interventions focused on biodiversity alongside wider ecosystem services. For example, the River Yare corridor west of Norwich (e.g. Barford and Bawburgh) and the River Tas corridor south of Norwich (Stoke Holy Cross and Newton Flotman) currently appear to be characterised by limited accessibility, an absence of international or national designations and extensive priority habitat.
- 6.2.20 Secondly, there is the possibility of supporting larger sites with a view to supporting more comprehensive schemes. For example, if there is the possibility of the plan supporting an increased number of homes then the land owner might tend to be more willing to offer land for accessible greenspace / biodiversity (e.g. woodland planting). Conversely, supporting smaller sites involving artificial sub-divisions of existing fields can lead to a risk of piecemeal expansion of the site in the future, leading to opportunities missed to secure new greenspace / biodiversity enhancements (albeit there can be strong arguments for taking this approach, e.g. where there is a need to maintain the characteristic linear built form of a village).
- 6.2.21 In **conclusion**, whilst differences are uncertain and potentially quite marginal, on balance it is considered appropriate to flag a preference for Option 2 (greater emphasis on accessibility), as theoretical arguments for concentrating growth, with a view to supporting the achievement of biodiversity objectives, do potentially apply in the context of South Norfolk / the Village Clusters Plan. With regards to significant effects, broadly neutral effects are predicted, given the limited number of homes involved / limited potential to support concentrations of growth. This conclusion is unchanged from the SA Report (early 2023).

Climate change adaptation

Objective: Support resilience to the potential effects of climate change, including fluvial and surface water flooding.

Option 1 The emerging preferred approach	Option 2 Increased emphasis on accessibility
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- 6.2.22 The key consideration here is the need to avoid development encroaching on fluvial flood risk zones, noting the possibility of expanded flood risk zones under climate change scenarios. A secondary consideration is surface water flood risk, noting that it is often possible to deal effectively with surface water flood risk through masterplanning and sustainable drainage systems (SuDS). Another consideration is development impacting on water flows and, in turn, down-hill / down-stream flood risk. However, it is difficult to pinpoint issues / opportunities ahead of detailed work, and it is typically the case that SuDS can be implemented to ensure no net worsening of run-off rates, and often a betterment. These issues are picked up in more detail through the Stage 1 and Stage 2 Strategic Flood Risk Assessments (SFRAs) prepared to support the Village Clusters Plan, most recently at this Addendum stage.
- 6.2.23 The proposed approach (Option 1) has been refined significantly, since the draft plan consultation stage, to take account of detailed understanding of fluvial and surface water flood risk, with a number of proposed allocations deleted or reduced in extent on the basis of flood risk. There is no reasonable argument for accepting increased fluvial flood risk in order to achieve an increased focus of growth at more accessible locations (Option 2), given the number of site options that are available (and given the requirement in national policy to take a sequential approach to avoiding flood risk).
- 6.2.24 For example, there is a shortlisted site at Gillingham subject to flood risk that cannot be considered a reasonable contender for allocation, despite Gillingham having strong accessibility credentials. Having said this though, there could be merit to giving close consideration to those areas of undeveloped land around Gillingham that are not affected by flood risk also noting the nearby recent service station on the A143 / A146 junction (albeit the land has not been promoted as available through the VCHAP).
- 6.2.25 In respect of surface water flood risk, two sites are of note:
- Hales – is well-connected to Loddon and other higher order settlements via footways and a good bus service, such that the possibility of an increased focus of growth here could be suggested (potentially alongside a reduced growth at nearby village clusters that are less-well-connected and/or close to the Broads). The proposal relative to the original draft plan stage is to extend the boundary of the proposed allocation (to 2.5 ha), but retain the capacity at 35 homes, such that there might be the potential to deliver additional homes. However, a surface water flood risk channel passes through the site (albeit low risk risk). It is also noted that an adjacent scheme for 23 homes has recently been developed, and the surface water flow path also affects this site, and it is understood that a design solution for the issue that covers both sites would be the ideal situation. The proposed allocation is now the subject of a planning application, with a committee resolution to approve (ref. [2023/2742](#)).
 - Bressingham – the proposed allocation is for 40 homes, whilst the one shortlisted site (SN4037), which might deliver 25 homes, is notable in that a surface water flow path starts within the site, with the flood risk channel affecting School Road downstream, which is an important link between the two parts of the village. In turn, it could feasibly be the case that modest development leads to an improvement in respect of offsite / downstream flood risk. With regards to accessibility, Bressingham performs fairly well, but not necessarily to the extent of warranting 65 homes.
- 6.2.26 With regards to proposed allocations under Option 1 that might feasibly be deleted, or assigned a reduced number of homes, under Option 2, the proposed allocation for 12 homes at Wortwell (a new allocation subsequent to the draft plan stage) is of note, as there is a significant area of surface water flood risk intersecting the site, including a significant area where there is a 1 in 30 year risk (according to the nationally available dataset). It is also the case that the site appears to perform quite poorly from an accessibility perspective, given that Harleston, where schools and other facilities are located, is beyond 2km to the west, and higher order settlements are some way distant (although the village itself does have a large, well-used village hall, a pub and garden centre/café).

- 6.2.27 In **conclusion**, it is not possible to meaningfully differentiate between the reasonable alternatives. With regards to significant effects, at this stage it is considered appropriate to predict neutral effects, as detailed evidence of fluvial and surface water flood risk has clearly had a major influence on site selection.

Climate change mitigation

Objective: Continue to drive down CO² emissions from all sources by achieving high standards of energy efficiency in new development, by providing attractive opportunities to travel by sustainable means and by protecting land suitable for renewable and low carbon energy generation, including community schemes.

Option 1 The emerging preferred approach	Option 2 Increased emphasis on accessibility
2	 1

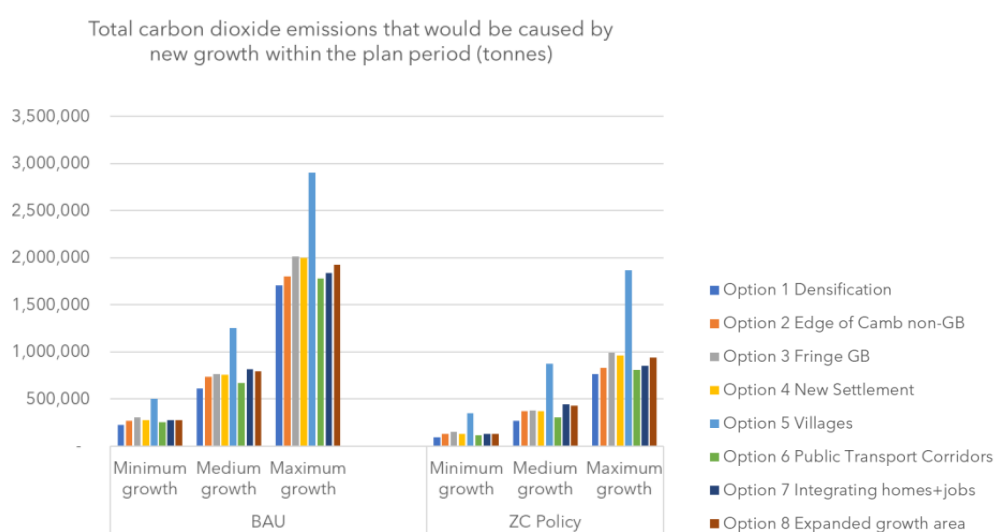
- 6.2.28 The key consideration here is in respect of minimising per capita emissions from **transport**, primarily via minimising the need to travel by private car, minimising the need to travel longer distances by private car and supporting the switch-over to electric vehicles. However, these subjects are a focus of discussion above (under 'Accessibility') and below (under 'Transport').
- 6.2.29 Minimising per capita emission from the **built environment** is also a national priority, and a subject that is highly relevant to local plans. However, it is difficult to foresee any particular issues or opportunities that might enable differentiation between the two reasonable alternatives. As part of this, it is important to note that strategic policies which cover this issue would apply under both scenarios.
- 6.2.30 Larger sites can tend to be associated with a decarbonisation opportunity over-and-above smaller sites, as economies of scale can support development viability. Also, larger sites can enable masterplanning options with a decarbonisation focus, for example 'smart' power networks linking solar PV, heat pumps, EV charging and battery storage within communities. However, this is not likely to be a relevant consideration in the context of the Village Clusters Plan, given a focus on sites of only up to ~50 homes.
- 6.2.31 One further important consideration is distributing growth and allocating sites mindful of electricity grid capacity, recognising that the national grid will come under considerable strain due to the electrification of heating and EV charging, combined with increased reliance on intermittent renewables. This could potentially serve as a reason for focusing growth along particular growth corridors, as opposed to dispersing growth widely (or, at least, supporting larger allocations at notably rural villages), but there is little certainty in this respect. No concerns regarding grid capacity have been raised to date.
- 6.2.32 Taking a step back, dispersing housing growth is quite widely understood to perform poorly as a spatial strategy option, relative to options involving concentrating growth at higher order settlements and/or at strategic sites. For example, recent work to appraise 48 scenarios for Greater Cambridge served to highlight a strategy of focusing growth at villages as performing very poorly – see Option 5 in Figure 6.1. The study is also notably suggests that growth quantum has a bearing on emissions, which is debatable (because there is a clear argument for focusing attention on per capita emissions, at the local level).
- 6.2.33 However, it is important to recall that the broad scope and objectives of the Village Clusters Plan are set by the GNLP, i.e. the decision to disperse growth is not being taken through the Village Clusters Plan, and that this growth reflects a very small proportion of the overall growth planned in the GNLP (significantly less than the proportion of those who currently live in those settlements).
- 6.2.34 In **conclusion**, as per the conclusion at the draft plan stage, it is considered appropriate to highlight a preference for a more accessibility-led strategy. However, this is conclusion is potentially quite marginal, as per the discussion presented above under 'accessibility', and given that the primary (and potentially overriding) consideration is in respect of emissions from transport.
- 6.2.35 With regards to the significance of effects, as per the conclusion at the draft plan stage, it is considered appropriate to flag **moderate or uncertain negative effects** on the baseline. This is despite:
- the discussion above in respect of the parameters for the Village Clusters Plan that are set by the GNLP;

- an understanding that the baseline situation is not likely to be one whereby the ~1,200 homes in question are instead brought forward as part of strategic scale schemes with stronger decarbonisation credentials, but rather a situation whereby, in the absence of a Village Clusters Plan, new homes are brought forward in a relatively uncoordinated way across small and medium-sized sites; and
- an understanding that the national switch-over to EVs is underway and likely to continue at pace.

6.2.36 The conclusion is precautionary, and aims to reflect the urgency of the issue, with a nationally declared climate emergency and a legally enshrined 2050 net zero target date and decarbonisation trajectory. South Norfolk is an example of a local authority that has yet to declare a climate emergency (although the Council as an organisation has set 2030 as a net zero target date). Also, as explained within the GNLP:

“Norfolk County Council has adopted a target of achieving net zero carbon emissions by 2030 for council owned land and buildings and for travel. In addition, they will **work towards carbon neutrality for the county, also by 2030.**” [emphasis added]

Figure 6.1: Emissions scenarios to inform the Greater Cambridge Plan (Etude & Bioregional, 2021) N.B. BAU = ‘Business as usual policy’; and ZC = Zero carbon policy.



Communities

Objective: Support the continued healthy and sustainable growth of South Norfolk, narrowing the gap between the areas of the District with strongest and least strong health and social outcomes.

Option 1 The emerging preferred approach	Option 2 Increased emphasis on accessibility
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6.2.37 There is limited potential to comment on the merits of the alternatives in respect of Communities objectives over-and-above the discussion presented under Accessibility, above.

6.2.38 However, it is important to emphasise again that the emerging preferred strategy (Option 1) has evolved considerably since the draft plan consultation stage, and it is undoubtedly the case that responding to ‘communities’ related issues and opportunities has been a primary driving factor. Considerations include:

- Directly supporting local community infrastructure objectives – perhaps most notably, Barford, where the latest proposal (first consulted on in 2023, and now a focus of the current Regulation 19 Addendum) is to deliver a replacement village hall. Also, at Aslacton (which is quite a rural village, distant from higher order centres), the proposal is to support an expanded site, relative to the draft plan stage, to include a ‘village green’ and offroad parking for the nearby school and church.

No clear opportunities are highlighted in respect of omission sites.

- Directly supporting local green / blue infrastructure objectives – it is difficult to point to beneficial shifts in strategy since the draft plan stage, nor to opportunities that might be missed under Option 2 due to site allocations being removed, or reduced in extent, at less accessible locations. It could well be the

case that, under Option 2, there is an additional degree of green / blue infrastructure opportunity, as discussed above (under Biodiversity); however, this is highly uncertain.

- Directly supporting road infrastructure objectives – Barnham Broom is the prime example of a settlement where the need to deliver a transport infrastructure upgrade is a key factor driving the strategy for growth. As discussed in Appendix III, because of the transport infrastructure opportunity, it is difficult to suggest that lower growth is a reasonable option, despite being quite a rural settlement. It is not clear that there are any clear issues to be avoided, or opportunities to be realised, under Option 2.
- Supporting bus services – this matter has been discussed above, and in theory is a reason for supporting Option 2, as there is a clear need to focus growth along select bus corridors, with a view to supporting the viability of services / higher quality services. However, it is far from clear that there are any significant opportunities that might be realised under Option 2 over-and-above Option 1.
- Road user and pedestrian safety – the matter of supporting sites with footpath connectivity to village services and facilities has been a focus of the site selection process, including changes made since the draft plan stage. However, there is also a need to consider the width / quality of footpaths, and the speed of motorists along the roads in question. Bunwell is notable as a village where the new proposed allocation since the draft plan stage (20 homes) could potentially be called into question under an 'Option 2' scenario. The village primary school is accessible via footpath, but is some considerable distance away, and the quality / safety of the footpath for young children appears to be variable along the route.

The proposed brownfield allocation close to Bergh Apton can also be called into question as there is no footpath connectivity (and the primary school is more than 2km distant), as has been discussed above.

Another site of note is the aforementioned expanded site at Aslacton, where provision will need to be made for carriageway widening and the inclusion of a frontage footway that links to nearby bus stops.

Conversely, Woodton is flagged in Appendix III as a village that could potentially see lower growth under Option 2, but this might lead to an opportunity missed in respect of development leading to enhanced footpath connectivity within the village. At Woodton the new proposed strategy, under Option 1, is to support a single allocation for 50 homes, with a view to supporting not only enhanced footpath connectivity, but also securing land for enhanced recreational and education facilities.

Equally, Little Melton is flagged as a village that could potentially see higher growth under Option 2, but the site that might be a prime contender for additional allocation under Options 2 (on the basis that it was a proposed allocation at the draft plan stage) is located at the edge of the village and subject to accessibility issues (*"reasonable verges but no footways..."*). In contrast, the sole proposed allocation under Option 1 (35 homes) relates very well to the village core, with the primary school adjacent.

- 6.2.39 In **conclusion**, as per the discussion presented above under 'accessibility', it is not possible to differentiate between the alternatives with any confidence. Supporting Option 2 could potentially have a degree of merit, in terms of avoiding communities-related issues and realising opportunities, but it could well be the case that it leads to communities-related opportunities being missed at more rural village clusters.
- 6.2.40 With regards to effect significance, there is an argument for predicting positive effects, noting the beneficial changes that have been made to the strategy since the draft plan stage. However, on balance, neutral effects are predicted. The communities-related opportunities set to be realised through the plan are overall relatively few in number and limited in significance.

Economy

Objective: Support the continued provision of, and vitality of, local employment opportunities across the District whilst seeking to take advantage of new strategic opportunities, e.g. Cambridge Norwich Tech Corridor.

Option 1 The emerging preferred approach	Option 2 Increased emphasis on accessibility
=	=

- 6.2.41 There is inherently very limited potential to draw strong conclusions under this topic heading, given that:
- none of the sites in contention for allocation would deliver new employment land (noting that strategic site options fall outside the scope of the Village Clusters Plan); and
 - the low overall numbers of new homes involved (at least 1,200 homes), combined with a need to distribute homes across a wide area (even under Option 2) mean that there is limited potential to suggest benefits from growth in proximity to employment / employment growth areas.
- 6.2.42 Little Melton is one village that is very well-located in terms of accessing strategic employment areas, including Norwich and Norfolk Hospital, Norwich Research Park and the University of East Anglia, and it is notable that the great majority of the land surrounding the village is being promoted for development.
- 6.2.43 However, there is a need to recall that strategic growth is outside the scope of the Village Clusters Plan. It also follows that there would be a need to proceed with caution under Option 2, as additional piecemeal growth (over-and-above the two sites preferred for allocation under Option 1) could feasibly hinder options for strategic growth that may come into contention through a future plan.
- 6.2.44 The strongest argument is potentially for dispersing growth (Option 1) so as to support rural industries, plus employment in rural services/facilities (e.g. schools). However, there is limited evidence of this being an issue/opportunity to be addressed through the Village Clusters Plan. Perhaps a key issue is in respect of small sites being suited to smaller, local housebuilders.
- 6.2.45 In **conclusion**, it is not possible to differentiate between the alternatives with any confidence.

Historic environment

Objective: Protect, conserve and enhance designated and non-designated assets and their settings, and contribute to maintaining and enhancing historic character through the design, layout and setting of new development.

Option 1 The emerging preferred approach	Option 2 Increased emphasis on accessibility
	2

- 6.2.46 Close consideration has been given to designated historic environment assets and also landscape and historic character as part of the site selection process, as is evident from the number of sites that have been rejected on the basis of historic environment constraint, and the adjustments that have been made to the strategy since the draft plan consultation stage.
- 6.2.47 Historic Impact Assessments have been undertaken for a range of sites identified through the Regulation 18 consultation by Historic England, and Landscape and Visual Appraisals have been undertaken for all Regulation 18 preferred sites, as well as for sites subsequently preferred post-Regulation 18, up to and including to account for changes proposed at the current Regulation 19 Addendum stage.
- 6.2.48 This being the case, it is possible to tentatively suggest that a strategy that places considerable weight on accessibility objectives (Option 2), could lead to tensions with historic environment objectives over-and-above a strategy that seeks to strike a balance between wide-ranging objectives, and is the result of an iterative process of over time (Option 1).

- 6.2.49 Also, generally speaking, the preferred allocations under Option 1 that potentially come under scrutiny under Option 2 are thought to have a tendency to be subject to fairly limited historic environment constraint. This reflects a tendency to comprise small sites in relatively peripheral locations, sometimes in the form of a continuation of linear / road frontage built form, typically dating from the 20th Century.
- 6.2.50 Having said this, an emerging proposed allocation at Winfarthing is subject to historic environment constraint and might potentially be reconsidered under Option 2. This site is visible on the approach to the village, with the start of the village marked by a Grade II listed building and the historic primary school.
- 6.2.51 Conversely, under Option 2, there *could* be a need for a greater shift in focus towards larger allocations closely related to historic village cores. However, this would by no means always be the case. For example, at Ditchingham / Broome and Spooner Row there are options to support more comprehensive schemes that seemingly give rise to limited concern from a historic environment perspective.
- 6.2.52 The following are notable locations that might see higher growth under Option 2:
- Barford – the site discussed (in Appendix III) as in contention for additional allocation is highly visible on the approach to Barford, where a Grade II listed building currently marks the start of the village. Historic England has raised an objection to this site.
 - Bawburgh – is constrained on account of an extensive conservation area, characteristically located on both sides of the River Yare, and the bridge is a scheduled monument. However, the site discussed (in Appendix III) as possibly in contention for additional allocation is quite peripheral to the village core.
 - Bressingham – the site discussed (in Appendix III) as in contention for additional allocation is adjacent to a Grade II listed building, albeit the building is somewhat set back and screened from the road.
 - Brooke – the site discussed (in Appendix III) as in contention for additional allocation is adjacent to a Grade II listed building that marks the western edge of the conservation area.
 - Hales – there might be the possibility of a higher density scheme within the proposed allocation, but it is understood that this could risk impacting on the setting of a nearby Grade II listed building.
- 6.2.53 In **conclusion**, there is support for Option 1, as a strategy that has emerged over time in light of detailed consideration of the historic environment evidence. However, it is recognised that this conclusion is highly uncertain, as it could well be the case that Option 2 involves additional growth at sites that give rise to limited historic environment constraint and/or at sites where there is good potential to avoid or suitability mitigation historic environment impacts.
- 6.2.54 With regards to significant effects, neutral effects are predicted overall. It is recognised that certain concerns were raised by Historic England through the draft plan consultation, but the Council responded to these concerns by undertaking detailed work including Heritage Impact Assessments. It is also important to recall that the baseline situation is one whereby there is relatively unplanned growth.

Housing

Objective: Support timely delivery of an appropriate mix of housing types and tenures to ensure supply of high quality housing across the village clusters which meets the needs of South Norfolk residents.

Option 1 The emerging preferred approach	Option 2 Increased emphasis on accessibility
	2

- 6.2.55 With regards to total growth quantum, the minimum overall quantum of growth to be delivered through the VCHAP is set by Policy 7.4 (Village Clusters) of the Greater Norwich Local Plan (GNLP), which says that “New sites in village clusters to provide a minimum of 1,200 homes will be allocated through a South Norfolk Village Clusters Housing Allocations Local Plan”.

- 6.2.56 Both of the options would involve providing for this minimum target figure, and there is no potential to suggest that either would perform notably better from a perspective of seeking to avoid delivery risk (i.e. from a perspective of ensuring that the 1,200 homes target is delivered in practice, recognising that delivery issues at the planning application stage are fairly inevitable, i.e. not all local plan allocations will deliver as expected). Any delivery risk from increased concentration (Option 2) would be marginal.
- 6.2.57 The key issue in terms of which it is possible to differentiate between the alternatives is the matter of ensuring a good geographic spread of new housing growth such that very locally arising housing needs are met, including needs at specific villages that have seen little or no recent housing growth. This is a key aim of the Village Clusters Plan and relates closely to the matter of supporting the general vitality of rural villages, which can otherwise be at risk from the effects of ageing populations. There is a need for housing in rural areas suited to families and younger households, and suited to downsizing.
- 6.2.58 There is also a need to consider increased / increasing demand for housing in rural areas, given an increased prevalence of home working, combined with a desire for gardens and countryside access.
- 6.2.59 Another consideration is supporting a good housing mix, including the full quota of affordable housing. The GNLP requires all major development proposals (ten or more dwellings) to provide at least 33% on-site affordable housing and a mixture of housing sizes, types and tenures in the Village Cluster locations. However, it is fair to highlight smaller sites (e.g. below 15 homes) as potentially being at risk of challenging development viability, such that the full quota of affordable housing cannot be provided for in practice. The average size of allocation under Option 1 is just over 25 homes, which serves as an argument in support of Option 2. However, it should be noted that the Village Clusters Plan is supported by a Viability Appraisal, with work undertaken both at the Regulation 19 stage and at the current Addendum stage, and which has looked at sites of 12, 25 and 50 dwellings.
- 6.2.60 In **conclusion**, as per the conclusion at the draft plan stage, the key consideration is judged to be a need to disperse housing growth relatively widely across the village clusters, in order to meet locally arising housing needs. However, it is recognised that larger sites can be better suited to ensuring delivery of a good housing mix, to include delivering a policy compliant quota of affordable housing.
- 6.2.61 With regards to effect significance, it is judged appropriate to predict **moderate or uncertain effects** only for Option 1. The GNLP sets the task of addressing this issue through an “innovative” approach, quite different to the approach of the recent past that has potentially led to problems in respect of access to suitable and affordable housing in rural areas. This is important context to the Village Clusters.

Land and soils

Objective: Ensure the efficient use of land and maintain the integrity of minerals sites and safeguarding areas

Option 1 The emerging preferred approach	Option 2 Increased emphasis on accessibility
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- 6.2.62 A key consideration is the need to avoid the loss of ‘best and most versatile’ (BMV) agricultural land, which the NPPF defines as that which is Grade 1, Grade 2 or Grade 3a.
- 6.2.63 The nationally available ‘provisional’ dataset – which is very low resolution / accuracy, such that it must be applied with caution - shows the great majority of South Norfolk to comprise ‘Grade 3’ quality land, which in practice might be Grade 3a (BMV) or Grade 3b (non-BMV). However, there are also significant patches of Grade 2 quality land, particularly in the north of the district.
- 6.2.64 Gillingham is notable as a village associated with Grade 2 quality land (according to the nationally available dataset) that might conceivably see additional growth under Option 2. Conversely, Rockland St. Mary and Burgh St. Peter are villages associated with Grade 2 quality land that might see lower growth under Option 2. Barnham Broom is another village notably associated with Grade 2 quality land, but the village is not listed in Table 5.3 as one of the villages that are potentially a ‘variable’ across the alternatives.
- 6.2.65 A related consideration is reducing the size of agricultural fields such that they become uneconomical, in terms of continued agricultural production. However, there is no evidence that this is a significant issue.

- 6.2.66 Aside from avoiding the loss of BMV agricultural land / impacting agricultural productivity, another consideration is seeking to make the best use of previously developed land. Two such sites are supported under Option 1 – located at Burgh Apton and Swardeston – that could potentially come in for scrutiny under Option 2, as they perform relatively poorly from an ‘accessibility’ perspective (specifically, at Swardeston, this is because there is a case for an alternative focus of growth at Mulbarton).
- 6.2.67 There are also several brownfield omission sites that could conceivably come into consideration for allocation under Option 2. However, these are all rejected for quite clear-cut reasons (none of the omission sites highlighted through the discussion in Appendix III comprise brownfield land).
- 6.2.68 A further consideration is the need to avoid sterilisation of minerals resources that could potentially be viably extracted. In this respect, numerous of the site options under consideration are located within a minerals safeguarding area, as understood from the adopted Norfolk Minerals and Waste Local Plan (N.B. a new plan was submitted in 2023), and the County Council has flagged a number of sites.
- 6.2.69 However, it is also important to note that safeguarding is not absolute, i.e. there can be scope to support development even where the effect would be to sterilise known minerals resource. Also, relevant Minerals Local Plan policy would support investigating the economic use of these resources, as part of any planning application process, and this is noted in the supporting text to allocations, where relevant.
- 6.2.70 In **conclusion**, it is not possible to differentiate the alternatives with any confidence.
- 6.2.71 With regards to effect significance, it is difficult to conclude that the effect of the plan will be significant loss of BMV agricultural land over-and-above the baseline situation.⁷ South Norfolk does not stand-out as particularly constrained, in terms of BMV agricultural land, in the sub-regional context (e.g. there are concentrations of high quality agricultural land in the vicinity of Great Yarmouth), and so there is an ‘agricultural land quality’ argument for ensuring a proactive approach to supporting growth locally.

Landscape

Objective: Protect and enhance the character, quality and diversity of the District’s rural landscapes, townscapes and river valleys through appropriate design and layout of new development, including protecting the setting of the Broads.

Option 1 The emerging preferred approach	Option 2 Increased emphasis on accessibility
=	=

- 6.2.72 The key strategic landscape consideration is in relation to potential impacts from growth in South Norfolk on the setting and character of the Broads National Park, although South Norfolk also has a range of local designations which look to protect various landscapes within the district. In addition, there is also potential for localised landscape sensitivities in areas without a formal designation where harm should be avoided, such as in relation to the settlement gaps within and between certain village clusters. As such Landscape and Visual Appraisals have been prepared for all preferred sites.
- 6.2.73 A discussion in respect of avoiding the risk of impacts to the Broads has already presented above, under Biodiversity, including a broad conclusion that there is an argument in favour of Option 2, as this might involve a focus of growth along the main road corridors, as opposed to villages located between the road corridor and the edge of the Broads.
- 6.2.74 However, landscape issues in respect of those Option 1 allocations in relative proximity to the Broads have been given careful consideration over the course of the plan-making process, such that it is difficult to identify sites that give rise to a particular concern.
- 6.2.75 Also, there is a need to consider the role of growth in terms of supporting the vitality of villages that are a ‘gateway’ to the Broads, and also delivering new homes to support those who work within the Broads.

⁷ Natural England guidance (gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land) highlights that planning applications involving loss of more than 20 ha of best and most versatile agricultural land give rise to a particular concern. However, in the context of local plans there is a need to consider the in combination effect of loss of agricultural land across numerous smaller sites.

- 6.2.76 Furthermore, under Option 2 there could be some pressure for additional growth at settlements that are closely associated with the Broads. In particular, Gillingham, Ditchingham / Broome and Earsham are villages that are both well-connected in transport terms and closely associated with the Broads.
- 6.2.77 The proposed allocation at Gillingham is potentially notable on account of the nearby national park boundary; however, it is unclear whether there remains a case for higher growth at the current time (2024) in light of the current focused changes, as set out in the Regulation 19 Addendum.
- 6.2.78 There is a need to consider the sensitive landscapes of the Norwich urban edge, including valued river valley landscapes, plus there is a need to consider strategic settlement gaps, perhaps most notably between Norwich/Cringleford, Hethersett and Wymondham, along the A11 corridor and between other settlements that serve as gateways into the city.
- 6.2.79 In this respect, it is fair to highlight a clear concern with Option 2, which could well involve a focus of growth at locations close to the Norwich urban edge, including along the river corridors, notably at a cluster of quite closely related villages to the west of Norwich, associated with the River Yare corridor, namely Little Melton, Bawburgh and Barford.
- 6.2.80 Amongst other things, there would be a risk of unacceptable impacts to the Norwich Southern Bypass Landscape Protection Zone (NSBLPZ) or long range viewing cones to Norwich. Policy DM4.6 of the adopted South Norfolk DM Policies Document (2015) states that purpose of the NSSLPZ is to:
- “... protect and enhance the landscape setting of the Norwich southern bypass by identifying where there are high levels of visual accessibility to and from the road to a predominantly open rural area that plays an important part in making the landscape setting of Norwich”.
- 6.2.81 However, on the other hand, growth could feasibly support targeted enhancements to the valley of the River Yare, including improved accessibility. For example, there are currently no public rights of way linking either Bawburgh or Barford to the river valley, nor the wider surrounding countryside.
- 6.2.82 Another river valley of note is the River Tas, to the south of Norwich, which is one of three river valleys dealt with by Policy DM4.5 of the South Norfolk DM Policies Document, which explains that development proposals must demonstrate how they protect “*the distinctive characteristics, special qualities and geographical extents*” of the three river valleys.
- 6.2.83 Newton Flotman and Stoke Holy Cross are quite well-connected villages that are closely associated with the river corridor. However, it is difficult to identify realistic potential for higher growth at either village, on the basis of the discussion in Appendix III.
- 6.2.84 A final consideration is the broad matter of arguments in support of comprehensive development schemes, instead of small schemes involving artificial sub-divisions of fields, which risk being expanded over time leading to sub-optimal piecemeal growth, with opportunities missed in respect of securing investment in infrastructure, e.g. new greenspace. There can also be a concern about the ability to integrate sites into the landscape where there are no established boundaries. This is as an argument in favour of Option 2.
- 6.2.85 However, on the other hand, under Option 2 there could be pressure to allocate modest sites at better connected villages where the effect could be to hinder future consideration of strategic growth options. For example, at Little Melton there is a clear ‘landscape’ argument for ensuring that strategic consideration is given to the question of what if any growth is appropriate to the north and east of the village.
- 6.2.86 In **conclusion**, it is not possible to differentiate between the alternatives with any confidence, with arguments for and against both Option 1 and Option 2. With regards to effect significance, neutral effects are predicted, with it clearly being the case that landscape sensitivities have been a key factor influencing the site selection process, including the process of refining site boundaries and site capacities. However, there still remains a slight concern regarding the drawbacks to a reliance on artificial sub-divisions of fields, at the expense of larger, more comprehensive schemes allocated with a long term perspective.

Transport

Objective: Ensure that provision of transport infrastructure reflects local population and demographic needs within and between the village clusters, promotes sustainable modes of travel where possible, connects new housing to employment, education, health and local services and maximises accessibility for all.

Option 1 The emerging preferred approach	Option 2 Increased emphasis on accessibility
2	 1

- 6.2.87 Transport issues and opportunities are closely related to those discussed above, under accessibility. However, from a transport perspective, there must be a particular emphasis on avoiding car journeys, including from a perspective of seeking to minimise traffic across the rural road network, and avoiding car journeys from the rural area leading to problematic traffic at junctions along the strategic road network.
- 6.2.88 In this light, under the 'Transport' heading there is a need to conclude support for Option 2, albeit recognising that it could lead to issues in respect of maintaining the viability of rural services and facilities, e.g. primary schools (and, in turn, generate longer journeys from settlements where facilities cease to be viable and close). There will always be a need to travel from rural villages to access higher order services and facilities, and to access employment and leisure activities, which leads to a 'transport' argument for focusing growth at those villages that are well-connected to higher order settlements via the strategic road network, public transport and/or a good cycle route. Also, as discussed, focusing growth along transport corridors can support enhancements, e.g. a new cycle route or an improved bus service.
- 6.2.89 In **conclusion**, there is support for Option 2, as per the conclusion at the draft plan stage, albeit it is recognised that there are also arguments in favour of Option 1 in terms of supporting local services and potentially limiting journeys to other settlements.
- 6.2.90 With regards to effect significance, broadly neutral effects are predicted, as per the conclusion at the draft plan consultation stage. With regards to Option 1, it is important to recognise that growth is spread widely across the district, which serves to reduce concerns regarding problematic traffic congestion along particular road corridors. With regards to Option 2, whilst there are opportunities that might be realised in theory (e.g. improved or maintained bus services), in practice there is little or no certainty.

Water

Objective: Promote sustainable forms of development which minimise pressure on water resources, whilst maintaining and enhancing where possible the quality of the District's rivers, lakes and other water bodies.

Option 1 The emerging preferred approach	Option 2 Increased emphasis on accessibility
=	=

- 6.2.91 A Water Cycle Study (WCS) was prepared in support of the GNLP in 2020, and then an Addendum specific to the Village Clusters Plan was prepared in 2022 and updated in 2024. A key focus of the 2022 and 2024 WCSs is examining the capacity of Water Recycling Centres (WRCs) and the environmental capacity of the water courses that receive treated water from the WRCs in combination with the wider planned growth.
- 6.2.92 The study was undertaken mindful that at rural WRCs even small changes to the number of homes served can have a significant effect and, in turn, lead to a risk of a breach of capacity, either in terms of the hydraulic capacity of the WRC or the environmental capacity of the receiving watercourse.
- 6.2.93 Focusing on the 2022 WRC (available at the time of writing):

- The study focuses attention on the following WRCs: Barnham Broom; Ditchingham; Forncett / Forncett End (serves Bunwell as well as Tacolneston / Forncett End); Long Stratton (serves Aslacton, Great Moulton and Tibenham); Whittingham Trowse (serves Little Melton and Bawburgh and Rockland St. Mary); and Woodton.
- Of these locations, Aslacton, Rockland St. Mary and Tacolneston have been identified as locations where there might feasibly be lower growth under Option 2, whilst Little Melton and Bawburgh are locations where there might feasibly be higher growth.

6.2.94 Focusing on the Whittingham Trowse WRC (the main WRC serving Norwich) the 2022 WRC explains:

- The GNLP WCS identified that delivery of the 33,517 additional dwellings to 2038 would cause the flow permit for the WRC to be exceeded. A further 47 dwellings allocated in the VCHAP (a total of 33,650 including GNLP growth) would exacerbate this situation.
- Therefore, additional environmental capacity assessment was required. This assessment considered impacts of additional treated flow on the receiving Water Framework Directive (WFD) water body.
- The modelling found:
 - The current quality of the Yare water body at the point of discharge can be maintained after growth as long as changes to the permitted quality limits are applied to the new permit to discharge. This would be achievable within the limits of conventionally applied treatment processes.
 - Changes in permit quality conditions could also be applied within the limits of conventionally applied treatment technologies to ensure no deterioration in WFD status of the Yare water body.

6.2.95 Similarly, for the other WRCs in question, the 2022 WCS finds that additional growth through the Village Clusters Plan can be accommodated, following investment in upgrades. Another key point to note is that Anglian Water has recently published its draft Drainage and Wastewater Management Plan (DWMP) which includes future strategies to accommodate both climate change and growth within the network.

6.2.96 However, that is not to say that efforts should be made to direct growth to WRCs where there would not be a need to rely on upgrades.

6.2.97 In **conclusion**, focusing on the matter of WRC capacity, which is a key issue, it is not possible to differentiate between the alternatives with any certainty. Option 2 could lead to reduced pressure on certain rural WRCs with capacity constraints, but increased pressure on the large WRC serving Norwich. As such, the alternatives are judged to perform broadly on a par.

6.2.98 With regards to effect significance, on the basis of the WCS (2022) there is confidence that the WRC can be upgraded as necessary to accommodate growth, and that development will be phased as necessary to ensure that growth does not come forward ahead of required WRC upgrades. Furthermore, confidence regarding the potential to deliver new homes in accordance with nutrient neutrality objectives has increased following the GNLP Inspectors' Report (2024), which is satisfied that good progress has been made on a mitigation strategy and mechanisms for implementing the strategy.

Appraisal conclusion

6.2.99 The appraisal serves to highlight that there is a very clear 'housing' argument in favour of Option 1 (the emerging preferred approach), but that there are also certain arguments in favour of Option 2 (an alternative approach with an increased emphasis on accessibility).

6.2.100 With regards to the appraisal under the 'accessibility' heading, the appraisal concludes that the two alternatives perform broadly on a par, and either approach would lead to a positive effect on the baseline (which is a situation whereby the Village Clusters Plan does not come forward and, in turn, growth comes forward in a relatively uncoordinated way).

6.2.101 Whilst concluding that Option 2 is not preferable in terms of 'accessibility' is somewhat counterintuitive, it reflects a need to account for several 'dimensions' of accessibility. A benefit of Option 1 is that it will have the effect of supporting the viability of village services and facilities, including primary schools.

6.2.102 It is for the Council, as decision makers, to assign a degree of importance / weight in the decision-making process to each of four topics where the appraisal identifies a preference and then, in turn, decide which of the two alternatives is best performing overall, i.e. best represents sustainable development on balance.

6.2.103 There is also the potential to question the appraisal conclusions reached in any given row within the appraisal table, with all of the conclusions associated with a considerable degree of uncertainty. Notably, the preference for Option 2 under 'climate change mitigation' and 'transport' is somewhat marginal.

Table 6.1: Reasonable alternatives - summary appraisal findings

Topic	Option 1 The emerging preferred approach	Option 2 Increased emphasis on accessibility
Accessibility	=	=
Biodiversity	2	★1
Climate change adaptation	=	=
Climate change mitigation	2	★1
Communities	=	=
Economy	=	=
Historic environment	=	=
Housing	★1	2
Land and soils	=	=
Landscape	=	=
Transport	2	★1
Water	=	=

6.3 Options for boosting supply

Introduction

- 6.3.1 This is the second of two sections presenting appraisal findings in respect of 'reasonable alternatives' although, in this instance, the focus of the appraisal is specifically on 'options for boosting supply'.
- 6.3.2 This appraisal is presented in order to inform representations at the current Reg 19 Addendum stage.
- 6.3.3 Specifically, the appraisal below considers the current proposed options for boosting supply alongside three others: SN0433 (Alpington; 1 ha; at least 12 homes); SN0552REVC (Barford; 0.73; up to 20 homes); and SN0055 (Barnham Broom; 1 ha; approx. 15 homes).
- 6.3.4 The full list of options for boosting supply is as follows:
- New site option
 - SN6000 (Barford; 4.82 ha; **40 homes**, plus replacement village hall and improved playing pitch)
 - Shortlisted omission sites
 - SN0218REV (Earsham; 1.4 ha; up to **25 homes**)
 - SN0552REVC (Barford; 0.73; up to **20 homes**)
 - SN0055 (Barnham Broom; 1 ha; approx. **15 homes**)
 - SN0433 (Alpington; 1 ha; at least **12 homes**)
 - SN4020 (Broome; 0.76 ha at least **12 homes**)

- Revisions to existing allocations
 - VC SPO1 REV (Spooners Row) – expanded site for **20 extra homes** (leading to 35 homes).
 - VC DIT1 REV (Ditchingham) – expanded site for **10 extra homes** (leading to 35 homes).
 - VC SWA2 REV (Swardeston) – same site but **10 extra homes** (leading to 40 homes).
N.B. this is a carried forward existing allocation (and the subject of application).
 - VC WIC1 REV (Wicklewood) – expanded site for **10 extra homes** (leading to 40 homes).
 - VC GIL1 REV (Gillingham) – expanded site for **5 extra homes** (leading to 40 homes).
 - VC TAC1 REV (Tacolneston) – expanded site but limited or no increase to supply.
 - VC BAW1 REV (Bawburgh) – expanded site but no increase to supply.

6.3.5 Finally, it should be noted that this appraisal is broadly *as per* that presented in the ISA Report (late 2023), as part of the consultation on options for boosting supply held under Regulation 18 of the Local Planning Regulations. However, the appraisal is updated to account for latest evidence, including responses received through the Regulation 18 consultation (see the Council's separate Statement of Consultation).

Methodology

6.3.6 This is an informal appraisal, which aims simply to differentiate between the options and flag potential issues / effects, as opposed to attempting to arrive at formal conclusions regarding 'significant effects' (as per the appraisal presented above, in Section 6, and that presented below in Section 9).

Accessibility

6.3.7 Performance of options in terms of accessibility objectives has been a key focus of the SA process since 2020/21, including work to define and appraise reasonable alternatives. This reflects a view that there is a risk of the Village Clusters Plan objectives unduly restricting options for growth aimed at aligning with accessibility objectives.

6.3.8 The SA Report suggested the following good practice principles:

- "Proximity to a higher order settlement – perhaps most notably those villages that are in relatively close proximity to Norwich. Swardeston is one such village but is notable for the fact that there is not a primary school at the village, with the local school instead located at Mulbarton. Ditchingham and Gillingham are also notable as villages closely linked to Bungay and Beccles respectively.
- Villages that are distant from a higher order settlement, but with relatively good 'sustainable transport' connectivity – Spooners Row stands-out on account of rail connectivity, albeit there is a very limited service, and there is not thought to be any potential for an improved service, in the context of the current plan. The village is also close to the A11, but regular bus services do not pass through the village.
- Villages that share transport corridors such that coordinated growth might feasibly support an enhanced bus service – whilst there may be no realistic potential in practice, possible growth corridors to the west and southwest of Norwich can be identified....
- Sites well located in terms of the ability to easily walk to local services and facilities – for example... higher growth at Bressingham [might be suggested].
- More comprehensive growth to secure new / upgraded community infrastructure – mindful of numerous instances of piecemeal recent and committed village expansion... which risks delivering sub-optimal outcomes, in terms of securing developer funding for new or enhanced infrastructure, including community infrastructure. However, it is difficult to pinpoint opportunities, with the emerging preferred approach already set to realise several opportunities, including in response to consultation and wider stakeholder engagement..."

6.3.9 A further accessibility-related opportunity relates to directing growth to a village where there is known to be an existing issue in terms of viability of local services or facilities.

6.3.10 Given the central importance of the issue, the villages in question are considered in turn.

Barford

- 6.3.11 SN6000 / VC BAR2 (new site; 40 homes) represents an excellent example of the potential to direct growth in such a way that secures planning gain. This new site was promoted through the January 2023 Regulation 19 publication for 25 dwellings, a relocated village hall and an improved sports pitch. Subsequent discussions then led to a scheme involving 30 homes plus additional community land. Latest understanding is now that the site is likely to require the delivery of 40 homes in order to viably deliver the community infrastructure that is needed.
- 6.3.12 It is also the case that the site is well-located within the village in terms of relationship to existing services.
- 6.3.13 Also, there is the option of allocating SN0552REVC (shortlisted omission; 20 homes). The site does not give rise to any particular accessibility-related issues or opportunities. However, there is a need to consider total growth quantum at Barford, which would reach 70 homes (given an existing allocation for 20 homes as well as the 'loss' of 10 homes from the 2015 Local Plan which were found to be undeliverable).
- 6.3.14 It is not clear that there are any concerns, noting that Barford is located on a B-road corridor in proximity to Norwich, and the corridor is also shared with Little Melton, which comes into consideration as a potential location for growth. Also, Barnham Broom and Bawburgh are linked to this B-road corridor (which relates to the Yare Valley). As such, there could be a growth-related opportunity around enhancing bus services.
- 6.3.15 Finally, with regards to Barford, it is noted that both of the two options for boosting supply received considerably more responses through the consultation in late 2023 than any of the other options (the options at Alington and Wicklewood also generated a notable response; also Bawburgh, but in this case the current proposal is to expand the site but not boost site capacity).

Earsham

- 6.3.16 The shortlisted omission site (25 homes) was previously preferred at the Draft Plan stage (2021). The site comprises half of an agricultural field, such that there could be pressure on the remaining half in the relatively near future. As such, consideration might be given to a comprehensive scheme (e.g. 50 homes) that delivers additional benefits for the village. However, it is recognised that this would run counter to the objectives of the Village Clusters Plan, particularly as there is another preferred site of 25 homes (located adjacent to the primary school).
- 6.3.17 Allocation for even 25 homes would give rise to a risk of over-allocation at Earsham (as previously discussed in the SA Report). However, the village has both a range of local facilities, and good access (including almost continuous footway and a reasonable bus service) to nearby Bungay. Also, the two sites in question are well separated from each other, reducing the immediate impacts of development.

Barnham Broom

- 6.3.18 The shortlisted omission site (25 homes) is an example of a site where a larger site might be considered that makes full use of existing field boundaries. However, it is recognised that design and layout needs to take account of the adjacent non-designated heritage asset. A further consideration, as discussed above, is the possibility of supporting a concentration of growth along the B1108-road corridor to the west of Norwich (which links Barnham Broom and around three other villages of note).

Alington

- 6.3.19 The shortlisted omission site (12 homes) comprises a small part of a larger field, but there is a logical extent to development given adjacent built form and the listed building to the south, such that there is little reason to question the proposed capacity of 12 homes. The site is adjacent to the village pub and close to the school, and Alington is in proximity to Poringland and Norwich.

Broome

- 6.3.20 Broome forms part of a wider cluster with Ditchingham that is relatively well served in terms of services and facilities, and the higher order settlement of Bungay is nearby. However, the shortlisted omission site (12 homes) is not very well located in terms of walking to village services, with the primary school at Ditchingham ~1.5km distant. The question therefore is whether additional growth at Ditchingham is preferable to supporting this site at Broome. However, it is recognised that accommodating all of the development from this site on the revised Ditchingham allocation (discussed below) would create the largest allocation in the Village Clusters Plan, leading to a tension with the plan objectives.

Spooner Row

- 6.3.21 The current option would involve a significant extension of the Regulation 19 allocation, in order to make better use of field boundaries / land within the field in question. Specifically, the proposal is to support a 35 home scheme, rather than a 15 home scheme. The extended site boundary would leave a small portion of the field in question undeveloped, however, this part of the field is subject to flood risk.
- 6.3.22 Moving forward, there should be ongoing scrutiny of the appropriate growth quantum, with a view to maximising the benefits of development. For example, the site might be suited to delivering a new children's play area and/or accessible green space.

Ditchingham

- 6.3.23 There is the option here to extend the existing allocation and support an additional 10 homes, bringing total capacity to 45 homes. Ditchingham has good accessibility credentials, and the village primary school is almost adjacent. However, this extension would still leave a small part of the field in question left undeveloped, hence the question arises as to whether the field might be allocated in full.
- 6.3.24 Indeed, the site in question is itself an extension to a site that is currently under construction, serving to shine a light on the risk of incremental development of a field leading to a risk of 'planning gain' opportunities missed. Having said this, it is recognised that part of the field that would be left undeveloped is constrained by surface water flood risk, and that highways capacity is a potential constraint here.

Swardeston

- 6.3.25 The approach to growth in the Mulbarton Village Cluster, which includes Swardeston, has been examined closely through the SA process. This is because there is no primary school at Swardeston, such that there is a case for a sole focus of growth at Mulbarton (where there is also a GP surgery and food shop). However, on the other hand, Swardeston is close to Norwich and on a good bus route. The SA Report explained: *"Swardeston is a village where, in theory, growth to deliver a primary school might be an ambition, but this is not thought to be a realistic possibility... in the context of the Village Clusters Plan."*
- 6.3.26 With regards to the current option under consideration, the proposal involves delivering an additional 10 homes within the existing VC SWA 2 carried forward allocation, bringing the total site capacity to ~40 homes. This does not give rise to any particular concerns, from an accessibility perspective. However, it is important to note that: there is another adjacent allocation; further adjacent land is under construction; and further adjacent land has delivered in the past ten years. This serves to highlight the importance of securing comprehensive growth wherever possible (recalling the lack of a primary school).

Wicklewood

- 6.3.27 This site comprises a small part of a much larger field, where the proposal at Reg 19 was to support 30 homes and the current option is an extended site for 40 homes. It is clearly only the north east corner of the field that is suited to development; however, there should nonetheless be ongoing scrutiny of the appropriate scale of growth with a view to securing benefits beyond new homes, including noting the adjacent primary school. Wicklewood is also notably well-connected to Wymondham, including by bus.

Gillingham

- 6.3.28 This existing allocation is important from an accessibility perspective, as it will support a primary school expansion. The supporting text within the Regulation 19 plan explains:

"The site is immediately south of Gillingham St Michael's Primary School and would landlock the school if developed out in its entirety. The VCHAP currently proposes 35 dwellings on this site and a further 20 within the school catchment at Geldeston (VC GEL1), which would add a modest number of pupils to the school. As both villages also experienced growth under the 2015 Local Plan and Gillingham has other

sites that were shortlisted in the VCHAP Regulation 18, which are still being actively promoted, it would be reasonable to expect that there will continue to be growth in the future. As such, the County Council has requested that 0.5ha of land be safeguarded...”

- 6.3.29 The current option under consideration would involve an additional five homes. Whilst it is not clear that this is necessary in order to secure delivery of the site and, in turn, the primary school extension, Gillingham is well located in terms of accessibility to facilities at the nearby services (shop and restaurants) and to the town of Beccles, which has a wide range of shops, services, facilities and employment.

Tacolneston

- 6.3.30 The option here involves only extending the site boundary from 0.6 ha to 1 ha and changing the capacity from ‘up to 25 dwellings’ to ‘approximately 25 dwellings’. The SA Report explained:

“The site is in close proximity to a primary school, but is otherwise in a notably rural location, given links to higher order settlements and also noting that some village facilities are beyond easy walking distance. The village is located on the B1113, but there is a limited bus service (the possibility of coordinated growth along this corridor, in order to support an improved service, might feasibly be considered... noting Mulbarton / Swardeston to the north).”

Bawburgh

- 6.3.31 The option here involves expanding the site but not increasing capacity, i.e. the intention is to support a lower density scheme in response to concerns raised at the Regulation 19 stage. As such, there are no significant implications for accessibility objectives.

Biodiversity

- 6.3.32 There are limited biodiversity concerns associated with the shortlisted options. Points to note are:

- Ditchingham (extension for +10 homes) and Broome (shortlisted omission site for 12 homes) are closely associated with Broome Heath, which is locally designated as a County Wildlife Site, and potentially sensitive as a highly accessible heathland.
- Gillingham (extension for +5 homes) is in quite close proximity to two components of the Broads SAC.
- Alington (shortlisted omission site for 12 homes) – development will likely result in at least the partial loss of the frontage hedgerow.
- Earsham (shortlisted omission site for 25 homes) – there is a small copse adjacent that would likely be enclosed by development and includes a mature oak. It is not shown on [historic mapping](#) but is shown as the intersection of two field boundaries.
- Tacolneston (extend site boundary) – biodiversity value of the site must be understood in the context of its position in the wider landscape. The Regulation 19 supporting text explains: *“A network of off-site ponds exists in proximity to the site development... should ensure ongoing connectivity between these ecological features. Similarly, appropriate measures will need to be taken to ensure the continued protection of the protected horse chestnut tree on the site frontage...”*
- Spooner Row (extension for +20 homes) – land adjacent to the proposed allocation, and within the same field, comprises a fluvial flood zone, but the land in question appears to be under arable production (which is unusual). As such, there could possibly be an opportunity for habitat creation.
- Barford (new site for 40 homes and/or a shortlisted omission site for 20 homes) – there is now the option of supporting total growth of up to 70 homes at Barford, which is notably located on the River Yare. There is no priority habitat present along this stretch of the river (but there is nearby), nor is this stretch of the river accessible by footpath, which serves to highlight a theoretical opportunity for enhancement.

Climate change adaptation

- 6.3.33 There are thought to be limited flood risk concerns associated with the shortlisted site options (N.B. some work remains ongoing at the time of writing). Points to note are:
- Ditchingham (extension for +10 homes) – surface water flood risk in this area is an issue, also noting that the surface water flowpath that directly constrains the site also feeds an off-site flowpath. There are limited concerns associated with the option of supporting an additional 10 homes but supporting further homes beyond this (an option discussed above) could prove challenging in flood risk terms.
 - Barford (new allocation for 40 homes) - the site is slightly uphill of the village, hence there is a need to consider surface water flows, noting the existing Barford Flood Alleviation Scheme.

Climate change mitigation

- 6.3.34 It is difficult to meaningfully comment on the performance of the options in terms of built environment decarbonisation. It could be the case that supporting additional homes at some sites boosts development viability such that there is greater potential to achieve net zero carbon development (or otherwise go beyond the requirements set out under Building Regulations), but this is highly uncertain.
- 6.3.35 With regards to transport emissions, the key issues are discussed above, under Accessibility.
- 6.3.36 Finally, see discussion in Section 6.2 regarding national and local decarbonisation targets/goals.

Communities and economy

- 6.3.37 There is limited potential to comment on the merits of the options over-and-above the discussion presented under Accessibility, above. Also see discussion below, under Transport.

Economy

- 6.3.38 There is inherently very limited potential to draw strong conclusions under this topic heading.

Historic environment

- 6.3.39 One of the sites listed above is subject to notable constraint, namely BAW1 (Land east of Stocks Hill, Bawburgh), which is associated with a village where there is an extensive conservation area associated with a characteristic river valley setting. The Regulation 19 Village Clusters Plan explains:
- “Bawburgh Conservation Area encompasses the central area within the village and extends as far south as the site boundary. Existing vegetation along the road frontage to the north of the site should be retained, as should the existing vegetation along the north boundary, as this contributes positively to the character of the area. The site layout and design, including landscaping and the choice of materials, should reflect the proximity of the site to the Conservation Area. In addition, archaeological finds north of the site mean investigation of the site may be required at the planning application stage...”
- 6.3.40 However, the proposal at the current time is to support an expanded site but not increase the site capacity. The intention is to enable greater scope to layout development within the site boundary so as to address historic environment and other related concerns.
- 6.3.41 The other key site to consider is the previously shortlisted omission site at Barford (20 homes). This is because development would extend the village form beyond Back Lane, which has historically formed the western extent over the village (see [historic mapping](#)), and because there is a Grade II listed building opposite the site that is fairly prominent on the approach to the village from the west which is a farmhouse that relates to the wider agricultural setting, including the proposed development site.
- 6.3.42 Finally, at Earsham the HIA concludes no concerns regarding impacts to views of the Grade I listed church (~450m distant), but there is also a need to factor in some risk of an expanded scheme in the future, given that the site forms half of a field (albeit there is potential to create a defensible boundary with landscaping).

Housing

- 6.3.43 The first point to note here is support for adjusting the approach at TAC1 (Land to the west of Norwich Road, Tacolneston) in order to bring the allocation more into line with a submitted planning application. This is because the application is for 29 affordable dwellings, alongside open space, landscaping and associated infrastructure.
- 6.3.44 Secondly, it is appropriate to comment here on delivery risks associated with the sites in question. In this respect, there are no major concerns, although one site to flag is at Alington. Specifically, this is an example of a site where further work is needed to confirm that suitable access can be achieved (without undue impacts to existing hedgerows). There is a clear argument for ruling out sites where access arrangements are uncertain, given the recent experience at Rockland St Mary, which has led to a delay in progressing the Village Clusters Plan.
- 6.3.45 It is also noted that this site at Alington is proposed for only 12 homes. In this light, there is a need to question whether any abnormal development costs necessary in order to achieve suitable access could impact development viability with implications for delivering the full policy quota of affordable housing.

Land and soils

- 6.3.46 The nationally available 'provisional' dataset, which is very low resolution / accuracy (such that it must be applied with caution), shows the great majority of South Norfolk to comprise 'Grade 3' quality land, which in practice might be Grade 3a (BMV) or Grade 3b (non-BMV). However, there are also significant patches of Grade 2 quality land, particularly in the north of the district.
- 6.3.47 Gillingham and Barnham Broom are notable as villages associated with Grade 2 quality. However, it is difficult to conclude significant concerns associated with allocating/expanding the sites in question.

Landscape

- 6.3.48 An immediate point to note is that sites at Ditchingham, Earsham, Barford and Bawburgh intersect a locally designated river valley landscape; however, none of the sites give rise to a particular concern:
- Earsham – the previously shortlisted omission site has built form on two sides and the A143 on a third although, as discussed above, the site comprises around half of an existing field, such that there could be pressure for future expansion. There is some screening vegetation along the A143, but nonetheless some views across the site. As things currently stand (with screening vegetation seemingly having been recently planted), this includes a view across the western part of the field in question, which is not proposed for allocation, of the Grade I listed parish church (~450 distant to the east).
 - Barford – the new site option will change the built form at the northern edge of the village and be notably open to the countryside along more than one of its edges, but there appear to be few concerns regarding problematic sensitive receptors (e.g. footpaths) or views into or across the site. It will be important that there is a defensible northern boundary to the site, given a local high-point in the landscape (the watershed between the Yare to the north and the Tiffey to the south).
- The previously shortlisted omission sites, which is a smaller site, would break into open countryside, and also use only a small part of a much larger field, such that there would be a degree of concern regarding future 'creep'. There are clear views of the field in question on the approach to the village from the west.
- Ditchingham – the option to extend the existing allocation for an extra 10 homes is potentially supported from a landscape perspective. The village closely associated with the Yare Valley, but the site in question is well contained in landscape terms.
 - Bawburgh – the village is associated with notable landscape and historic environment constraint due to a close association with the River Yare. It is one of only a limited number of proposed allocations where there is a requirement for a Landscape Appraisal/Assessment to be undertaken in support of any planning application. The proposal to expand the site, but not increase capacity, is supported.
- 6.3.49 Other options of note are as follows:
- Gillingham – is sensitive on account of close association with the Broads Authority Area, and also for other reasons including the presence of nearby conservation areas. The Village Clusters Plan explains:

“The site will require a comprehensive approach to landscaping, reflecting the fact that there is only existing development on the northern boundary. Whilst largely contained in the wider landscape, the more localised impacts development could be significant. A landscaping scheme has been agreed for the existing GIL1 allocation (application ref. 2019/1013) and consideration will need to be given as to how this is carried forward under proposals for this allocation. The western boundary of the site has some established vegetation that will require protection and enhancement as necessary. Careful consideration will need to be given to the southern and eastern boundaries, which are open to the remainder of the wider field and adjoining paddocks. Particularly important will be consideration of views from the Broads Authority area to the south, at Kings Dam and beyond, and from the public rights of way Geldeston FP8 and Gillingham FP12. Consequently, a full Landscape Assessment will be required to accompany any planning application(s) for the site.”

- Wicklewood – is associated with quite an open, expansive landscape, and the lack of existing field boundaries creates challenges. The Village Clusters Plan explains:

“The site is within a prominent plateau landform and forms a smaller area within a larger agricultural field. As such it is recognised that there are landscape and visual impacts associated with development of this site. However, an assessment of the context of the site has confirmed that with careful landscaping and layout this site offers an opportunity to create a key gateway entrance to the village, as well as reinstate previously lost hedgerow landscape features. To achieve these objectives there will be a particular emphasis on the soft landscaping, on-site tree planting and the layout and design of the site. This landscape focus is reinforced by the organic boundaries of the site. An area of open space in the north east corner of the site will form a visual focal point around the existing village sign, reinforcing the gateway location and retaining an open aspect...”

- Broome – the allocation option would extend the current linear / frontage built form further into the open countryside, and there is an understood need for careful design and landscaping to create a gateway to Broome (also potentially help reduce traffic speeds entering the village). There is an existing substantial dwelling on the opposite side of Yarmouth Road, which already creates a more enclosed feel to the east.
- Spooner Row – the site expansion option would involve revising the previous strategy of a frontage-only development that was proposed in order to complement the existing settlement pattern.
- Tacolneston – there is a need to consider a green gap between existing areas of built form:

“A green gap separates Tacolneston into two clusters of development, north and south along the B1113. Whilst VC TAC1 will have an impact on the open, semi-rural, character created by this gap it relates well to the existing built form to the north of the village, particularly the development at Dovedale Road, as well as the existing agricultural buildings to the west and the planning permission for 3 dwellings along the site frontage (2016/2635). With appropriate design and landscaping, and viewed in the context of the existing developments, this site will not have a significant impact on the wider landscape setting.”

Transport

- 6.3.50 The site option at Aplington has already been discussed as being associated with access challenges, and the discussion above under Accessibility is clearly also highly relevant from a transport perspective, e.g. with a view to minimising long distance car trips and car trips along rural lanes.
- 6.3.51 The site at Swardeston is also of note, as there are adjacent sites proposed and under construction, hence there is a clear need for a coordinated approach to securing walking and cycling connectivity. The Village Clusters Plan explains: *“Opportunities to provide pedestrian and vehicular connectivity between the sites should also be explored at the detailed design stage...”*
- 6.3.52 It is difficult to comment further with any certainty.

Water

- 6.3.53 A Water Cycle Study (WCS) was prepared in support of the GNLP in 2020, and then a Village Clusters Plan Addenda have been prepared. A key focus of these 202 Addenda is examining the capacity of Water Recycling Centres (WRCs) and the environmental capacity of the water courses that receive treated water.
- 6.3.54 The study was undertaken mindful that at small, rural WRCs even small changes to the number of homes served can have a significant effect and, in turn, lead to a risk of a breach of capacity, either in terms of the hydraulic capacity of the WRC or the environmental capacity of the receiving watercourse.

- 6.3.55 The study focuses attention on WRCs at: Barnham Broom; Ditchingham; Forncett / Forncett End (serves Bunwell as well as Tascolneston / Forncett End); Long Stratton (serves Aslacton, Great Moulton and Tibenham); Whittlingham Trowse (serves Little Melton / Bawburgh and Rockland St. Mary); and Woodton.
- 6.3.56 It is not possible to conclude any significant concerns. However, points to note are:
- Spooner Row – the expanded site option at would drain to Spooner Row WRC, which is known to be constrained. It has been suggested that the developer may need to consider alternative on-site treatment, subject to the necessary permits, but this could have viability implications.
 - Ditchingham and Broome – boosted supply would be in addition to the 2015 Local Plan allocations at both villages, and the cumulative impact of recent and planned growth may require phasing of development to allow for upgrades to Ditchingham Water Recycling Centre.
 - Gillingham – there is limited capacity at the Beccles-Marsh Lane WRC, but there is potential for upgrade.

Conclusion

- 6.3.57 The key question is how many of these shortlisted options for boosting should ultimately be supported for allocation in order to boost supply, i.e. ensure that the Village Clusters Plan comfortably provides for the target figure of 1,200 homes set by the GNLP.
- 6.3.58 Ideally it might be possible to place the options in a sequential order of preference, but taking that step is beyond the scope of this report. It is, however, possible to make the following headline points:
- The new site option at Barford represents a significant change and generated a significant response through the consultation in late 2023. It is also noted that the decision has been taken to increase the capacity of the site since that time (from 30 homes to 40 homes). Care will need to be taken to ensure the new development relates to the existing village built form, whilst realising the key opportunity to deliver new community infrastructure, in particular a replacement village hall as part of a new village hub. It should also be noted that Barford effectively 'lost' its 2015 Local Plan allocation for ~10 homes as the site could not be delivered.
 - With regards to options involving allocation of previously shortlisted omission sites, there are a number of sites associated with certain issues, although all are of limited significance. Specifically: the site at Broome performs relatively poorly from an immediate accessibility perspective (although the cluster and nearby Bungay provide a good range of services and facilities); the sites at Alington and Barford (B1108/Back Lane) are subject to a degree of landscape and/or historic environment constraint (and both generated notable interest through the consultation in late 2023); and at Earsham there is a need to consider the appropriate extent of the site boundary in order to avoid piecemeal growth leading to opportunities missed in terms of securing benefits to the village.
 - There is support for a number of the options involving boosting supply from existing allocations from an accessibility perspective, and none of the options give rise to significant concerns in other respects. For example, the clusters in the Waveney Valley (Earsham, Gillingham etc. and Ditchingham etc.) have good access to higher order settlements at Bungay and Beccles. The Wicklewood option would need to be carefully considered from a landscape perspective (and did generate notable interest through the consultation in late 2023) and the Spooner Row option pushes the numbers in the village to the upper end of the range considered appropriate given the scope and objectives of the Village Clusters Plan.
- 6.3.59 With regards to in-combination effects, one consideration is the proximity of Ditchingham and Broome to Broom Heath CWS. The appraisal also flags possible in-combination biodiversity benefits at Barford.
- 6.3.60 Finally, with regards to the total quantum of additional supply that should ultimately be supported, it is difficult to draw conclusions, but there is a clear need for a healthy 'buffer' over-and-above the required 1,200 homes figure, as a contingency for unforeseen delivery issues. Also, there is a need to recall that the 1,200 homes figure is a minimum figure that was established some time ago (and then explicitly tested through the GNLP Examination in Public), and there is generally a need to take a proactive approach to housing growth / meeting needs.

7 The preferred approach

Introduction

- 7.1.1 The aim of this section is to present SNC officers' response to the two appraisals presented above and, in turn, officers' reasons for supporting the preferred option/approach in each instance.

Spatial strategy

- 7.1.2 The view of officers is broadly unchanged from the equivalent statement presented within the SA Report (2023). Specifically, Option 1 is supported for the following reasons:

"The plan aims to strike a balance between directing growth to the most accessible village clusters, remaining mindful that it is right to attach importance to transport and climate change SA objectives, whilst also providing opportunities for residential development in a range of villages with more modest accessibility to services and facilities in relative terms. This reflects the larger and more dispersed rural geography of South Norfolk and attaches importance to wider plan objectives and sustainability topics that include meeting the need and demand for housing and supporting services across the rural area in order to maintain and enhance the vitality of rural communities. It is important to remember that the intention of allocating land for development within the Village Clusters, as set out in the GNLP, was to promote social sustainability supporting rural life and services.

Striking the correct balance between these different themes is not a straight-forward. However, in considering this balance it is critically important to remember that the Village Clusters Plan forms but one small element of the much larger Development Plan for Greater Norwich. This wider strategy is primarily contained in the Greater Norwich Local Plan, which primarily directs growth to Norwich and its built-up urban fringe, the Main Towns and the largest, and most accessible, villages. Therefore, when considered comprehensively it is the case that the emerging Development Plan has a very strong emphasis on placing growth in the most accessible locations.

To find an appropriate balance for the distribution of development within this context, the final selection of proposed allocations has been subject to an iterative process of adjusting and refining the plan. This has included significant adjustments made after the draft plan consultation (2021), subsequent adjustments over the period 2021-2022 including in light of detailed evidence workstreams, further adjustments in 2023 following the Regulation 19 publication stage and then final (very limited adjustments) in 2024 following consultation under Regulation 18 in late 2023. The appraisal is broadly supportive of the adjustments that have been made, and one key point to note is that the appraisal now concludes that the preferred approach performs broadly on a par with the reasonable alternative in terms of 'accessibility', in contrast to the appraisal finding in 2021.

Having said this, it is noted that the appraisal serves to highlight that the Village Clusters Plan still gives rise to tensions with certain sustainability objectives. It is also noted that the appraisal concludes broadly neutral effects in terms of a number of headings, instead of positive effects. This serves to highlight the importance of setting site-specific policy aimed at realising sustainability objectives, with the potential benefits of development maximised and negative effects minimised. However, it is recognised that, given the specific remit and objectives of the Village Clusters Plan, a degree of residual tension with certain sustainability objectives is inevitable."

Boosting supply

- 7.1.3 The view of officers is as follows:

"The preferred approach involves taking forward 8 of the 11 options for boosting supply consulted on in late 2023, namely all bar the options involving allocation of shortlisted omission sites at Alington, Barford and Barnham Broom. The combined effect is such that the total supply now identified through the Village Clusters Plan is comfortably in excess of the 1,200 home target, such that there is a 'buffer' that is considered to be of a suitable size to account unforeseen delivery issues. With regards to the supported options, the new proposed allocation at Barford generated a considerable response through consultation, and stands out in terms of quantum of growth, but the site will deliver a replacement village hall and wider community benefits. With regards to the three options not being taken forward, there is considered to be clear justification having accounted for both site-specific and village-specific factors. A key point to note is that all three of the villages in question are set to see significant growth under the proposed approach."

Part 2: What are the appraisal findings at this stage?

8 Introduction to Part 2

- 8.1.1 The aim here is to present an appraisal of the Village Clusters Plan, as a whole.
- 8.1.2 It is an update to the equivalent appraisal presented in Part 2 of the SA Report (2023), with a particular focus on accounting for the 11 proposed options for boosting supply that are a focus of the current Regulation 19 Addendum.

Overview of the plan

- 8.1.3 The plan includes a section for each of the 48 village clusters, and within the majority of sections presents one or more allocations. In total there are 47 proposed allocations and, in each case, the plan presents site specific policy as well as supporting text explaining the range of issues and opportunities.
- 8.1.4 As well as new proposed allocations, at ten village clusters the plan also presents one or more existing allocations to be 'carried forward'. Existing allocations are not examined to the same extent as new proposed allocations, given that they have been examined in detail in the past and been found to be suitable etc. Also, most have planning permission, and several are notably small.
- 8.1.5 A carried forward allocation at Swardeston is notable for being quite large (now proposed for 40 homes, having previously been proposed for 30) and because of an adjacent new proposed allocation. Also, a carried forward allocation at Hales (23 homes) is notable on the basis of an adjacent new proposed allocation, although the carried forward allocation now has planning permission.

Appraisal methodology

- 8.1.6 Appraisal findings are presented across 12 sections below, with each section dealing with a specific sustainability topic. For each of the sustainability topics in turn, the aim is to discuss the merits of the proposed submission plan, as a whole, before reaching an overall conclusion on significant effects. Specifically, the regulatory requirement is to "identify, describe and evaluate" significant effects.
- 8.1.7 Conclusions on significant effects are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the local plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future). In light of this, there is a need to make considerable assumptions regarding how the plan will be implemented 'on the ground' and the effect on particular receptors. Assumptions are discussed in the appraisal text where necessary.
- 8.1.8 The appraisal aims to strike a balance between, on the one hand, a need to be systematic with, on the other hand, a need for conciseness and accessibility. The aim is *not* to systematically discuss each and every element of the plan in respect of each element of the SA framework. This approach is taken mindful of the concerns raised by the DLUHC Committee (August 2022), who [emphasised](#) a need to: "*streamline the current bureaucracy and overcomplication associated with... assessments.*"

Focused changes

- 8.1.9 Under each heading a box gives stand-alone consideration to the focused changes that are a focus of the current Regulation 19 Addendum.

9 Appraisal of the proposed submission plan

- 9.1.1 This section presents an appraisal of the current 'draft plan' consultation document as a whole. The appraisal is presented as a series of narratives under the SA framework (see Section 3).
- 9.1.2 Under each heading a box gives stand-alone consideration to **focused changes**.

9.2 Accessibility

Objective: Support good access to existing and planned services, facilities and community infrastructure, including green infrastructure, for new and existing residents, mindful of community needs changing over time.

9.2.1 The question of the ‘accessibility’ merits of the emerging preferred approach, relative to alternatives, has been a key focus of SA across the course the plan-making process. Part 1 of this report explains how work was first undertaken to explore high-level alternatives in 2021, and this work was updated in 2023 and then again in 2024.

9.2.2 The conclusion of the alternatives appraisal is that emerging spatial strategy is broadly supported, from an accessibility perspective. It is possible to point to adjustments that might be made, but not with any great confidence, because reaching conclusions on ‘accessibility’ is inherently complicated / challenging, due to a need to consider several ‘dimensions’ of accessibility. Essentially, there is a need to balance the need to support access to local services and facilities within the clusters against access to a wider range of services within higher order settlements.

9.2.3 Having made this overarching statement, the following bullet points consider select proposed allocations.

N.B. other relevant site-specific discussions are presented under other topic headings.

- WOO1 (Land south of Church Road, Woodton; 50 homes) – is notably separated from the village core, but will deliver significant benefits to the local **education** offer. Supporting text explains: *“Primary and/or pre-school education facilities in the village will be enhanced through the delivery of this site. This will be achieved through the safeguarding of land within the allocation site, or through the repurposing of land within the existing recreation ground with the loss of land being compensated for by safeguarded land within the allocation site boundary. The safeguarded land within VC WOO1 for education or recreation use... must be delivered in addition to the Council’s current requirements for open space...”*

Furthermore, there is an opportunity to improve **pedestrian connectivity**. The supporting text explains that *“existing pedestrian connectivity around the primary school site is noted as being substandard. Development of VC WOO1 provides an opportunity to improve the current situation by creating a new pedestrian link between Woodton Primary School to the east and The Street to the south, via both the recreation ground and The Woodyard Square...”*

The supporting text summarises the approach taken at this site as follows: *“Due to the delivery of the additional community benefits associated with this site, specifically the improved pedestrian connectivity for the village and the provision of an area of land to support the ongoing pre-school education facility within the settlement, as well as the standard infrastructure requirements, the scale of development proposed is considered to be reasonable in accordance with the objectives of the VCHAP.”*

- BAR2 (Village hall, Barford, 40 homes) is the other key site that is delivering new community infrastructure, namely a **replacement village hall and an improved playing pitch**. It is a new proposed allocation through Focused Changes and, in turn, is a focus of discussion within Section 5.3, and is also discussed briefly in the box below. Site specific policy requires:

“Delivery of a new village hall close to the existing playground, of a function equal to or better than the existing hall, with sufficient parking and constructed to the latest environmental standards, and provided freehold to the community; Continuity of use of a village hall and the other community facilities throughout construction of the development. Enhancement of the existing playing field, particularly to address existing flooding problems.”

- GIL1REV (South of Geldeston Road and Daisy Way; 40 homes) – will support a **potential primary school expansion**. The plan explains: *“The site is immediately south of Gillingham St Michael’s Primary School and would landlock the school if developed out in its entirety. The VCHAP currently proposes 45 dwellings on this site and a further 20 within the school catchment at Geldeston (VC GEL1), which would add a modest number of pupils to the school. As both villages also experienced growth under the 2015 Local Plan and Gillingham has other sites that were shortlisted in the VCHAP Regulation 18, which are still being actively promoted, it would be reasonable to expect that there will continue to be growth in the future. As such, the County Council has requested that 0.5ha of land be safeguarded...”*

- BB1 (Corner of Norwich Road and Bell Road, Barnham Broom; 40 homes) – is the most significant example of a site where development will help to secure a notable **highways** improvement and, in turn, increase the potential to safely access village services and facilities. The supporting text explains: *“Currently the junction adjacent to the site has poor alignment... Currently there is no opportunity to*

improve the junction sufficiently within the existing highway to support additional development in the vicinity. As such, the development of this site will require the realignment of Bell Road through the site, to stagger the junction. This will also give the opportunity to create a focal public open space adjacent to the Village Store and improved parking arrangements...

The site capacity has been slightly reduced since the draft plan stage, but this still represents quite a large and higher density allocation, in the context of the Village Clusters Plan. The supporting text explains: *“An area of 1.40ha is allocated for approximately 40 dwellings, a scale of development that is considered to be reasonable to enable the alterations that are required to the existing road alignment as well as the provision of an area of open space within the boundaries of the site.”*

- ALP1 (West of Church Meadow, Alington; 25 homes) – is one of numerous other examples of site allocations for which the proposed policy includes a focus on **highways** requirements that could potentially lead to a benefit to the existing local community. The supporting text explains: *“For highways safety, and to encourage sustainable transport options, offsite highways works will include: localised widening of Church Road, particularly in the vicinity of the Church Meadow junction; an improved crossing point between Church Meadow and Alington with Yelverton Village Hall; and formalising the currently unmarked bus stops on Church Road. Alternative highways solutions may be agreed with the Highway Authority at the time of any planning application.”*

It is also one of several examples of policies that include a clear focus on ensuring connection to (and potentially improving connectivity to) the local network of **public footpaths**. The policy requires: *“Pedestrian link to footpath Alington FP2/Yelverton FP4, which runs along the northern boundary...”*

- BAW1REV (East of Stocks Hill, Bawburgh, 35 homes) – a Focused Change proposes to extend the site boundary, but also add a policy criterion as follows: *“Provision of a direct **pedestrian/cycle access** on the northern boundary of the site into Bawburgh Primary School, to be agreed with the school.”*
- BRE1 (Land east of School Road, Bressingham; 40 homes) – is a notable example of a site where there is the potential to lead to a net benefit in terms of provision for **parking** and, in turn, the potential to safely make use of village services and facilities. The supporting text explains: *“Local concerns have also been raised about parking issues associated with pick up and drop off at the adjacent school. Options to improve car-parking provision in close proximity to the school are limited. Therefore, to ensure the satisfactory functioning of the highway network, applicants will be required to undertake an assessment to determine the requirement for and deliverability of a school car park within the site in conjunction with Norfolk County Council, Bressingham Primary School and South Norfolk Council...”*
- LM1 (South of School Lane and East of Burnthouse Lane, Little Melton; 35 homes) – is another example of a site that will deliver new parking to the benefit of the village, and there is also a **pedestrian / cyclist** connectivity opportunity. The supporting text explains: *“The School Lane frontage is in the heart of the village... Improvements to the frontage footway will be required for this development... As the site is opposite the Primary School it is proposed to incorporate a small off-road parking area, to alleviate localised on-carriageway parking... An additional access also exists to Braymeadow Lane to the southeast, which could provide pedestrian and cycle connectivity for the site, with the latter linking to Hethersett Lane and the Norwich Research Park and... University Hospital as part of the potential extension of the ‘Pink Pedalway’. The outcome is a lower density scheme, with 35 homes across 3ha.*
- BAP1 (Former Concrete Batching Plant, south of Church Road, Bergh Apton; 25 homes) – has been highlighted over the course of the SA process as being subject to clear issues, from an accessibility perspective, given limited potential to **safely walk** to village services/facilities (however, it is important to recall that this is a brownfield site with a current use that is not suited to a rural location). Supporting text explains: *“Church Road is rural in character, with no footways, and land should be dedicated for footway provision on the site frontage should this need to be implemented in the future...”*

Furthermore, supporting text explains: *“Whilst the historic use of the site previously generated traffic, including HGV movements, off-site highways works will be required between the site and the junction of Church Road and The Street to facilitate the safe passing of vehicles in both directions.”*

Also, and importantly, supporting text summarises the situation as follows: *“The site is limited to a maximum of 25 dwellings, reflecting the balance between making effective use of the available land and the need to address the cost of redeveloping a former brownfield site, against the relatively remote nature of the site and the more limited ability to walk or cycle to local services and facilities.”*

- SEE1 (West of Mill Lane, Seething; 12 homes) – is another example of a site where the situation in respect of footpath connectivity is not ideal. The supporting text explains: *“The site is less than 1km*

from the local services and facilities in the village, as well as the bus stops on the route that currently serves Norwich City Centre. Whilst there are no footways on Mill Lane, much of the road has wide verges and there is good visibility. The Highway Authority has indicated that a footway along the site frontage will be necessary, although this could be less formal in nature to reflect the character of the area, along with local carriageway widening.”

- ASL1 (Land off Church Road, Aslacton; 35 homes) – is a site that has been expanded in extent, since the draft plan stage, including with a view to securing a new **greenspace**. The supporting text explains: *“The development of the larger site proposed offers the opportunity to provide an open green along the frontage of the site, increasing the range of amenities available in this part of the village and provides scope for school parking to help address local highway issues.”*
- SPO2 (South of Station Road, Spooner Row; 25 homes) – is another example of a site where there is a focus on ensuring comprehensive rather than piecemeal growth. Supporting text explains: *“Originally promoted... as two separate parcels... the site is a single allocation in order to **maximise the benefits of housing delivery**, and as such a single scheme is required with no artificial subdivision of the site.”*

9.2.4 In conclusion, in light of the above discussion of site specific policy (N.B. site specific policy was not taken into account as part of the appraisal of reasonable alternatives presented in Section 6), it is judged appropriate to predict **significant positive effects** on the baseline.

Focused changes at the current Regulation 19 Addendum stage

A detailed discussion of options for boosting supply is presented in Section 6.3, but focusing on just those options taken forward as Focused Changes, key issues relate to: Barford (strong support for a replacement village hall); Earsham (quite well-connected but a larger scheme to deliver community infrastructure could be considered); Spooner Row (the village benefits from a train station, but with very limited services and low likelihood of improvement); Ditchingham & Broome (good accessibility credentials, particularly for the Ditchingham site); Swardeston (the village does not benefit from primary school, unlike nearby Mulbarton); Wicklewood (well-connected to Wymondham); and Gillingham (supports primary school expansion and close to local facilities).

9.3 Biodiversity

Objective: Avoid harm to South Norfolk’s rich diversity of internationally, nationally and locally designated sites of biodiversity significance, as well as harm to such sites in adjacent Local Plan areas, whilst seeking to deliver a biodiversity net gain and habitat enhancement where possible

- 9.3.1 The discussion presented in Section 6 does not identify any significant concerns with the preferred strategy, but tentatively suggests that an alternative strategy with a greater focus on ‘accessibility’ might be preferable in biodiversity terms, assuming: A) a shift of focus away from ‘Broads edge’ villages towards nearby transport corridors; B) a possible increased focus of growth along other river valleys / transport corridors, with a view to realising strategic biodiversity enhancement opportunities; and C) an increased emphasis on larger sites, which might give rise to additional biodiversity opportunity.
- 9.3.2 With regards to the matter of impacts to internationally important habitats associated with the Broads (also other areas of internationally important habitat in the district), it is important to be clear that the plan has been subject to a stand-alone Habitats Regulations Assessment (HRA), which concludes that the plan will not result in significant adverse effects, either alone or in combination with other plans.
- 9.3.3 Having made this overarching statement, the following bullet points consider select proposed allocations.
- THU1 (Land north of Blacksmiths Gardens, Thurlton; 12 homes) – is an example of a site that is in notable proximity to a **SSSI**. The supporting text explains: *“Whilst no ecological constraints on the site have been identified, the site is located within a SSSI Impact Risk Zone. Natural England should be consulted if there is to be any discharge of water or liquid waste of more than 20m³/day to ground (i.e. to seep away), or to existing areas of surface water (such as a beck or a stream).”*

- DIT1REV (Land at Thwaite's & Tunneys Lane, Ditchingham; 45 homes) – is in proximity to Broome Heath **CWS**. This site is the subject of Focused Changes, and new site specific policy has been added that requires an “ecological assessment... to consider to potential impacts on nearby designated sites”, and no objections have been raised. However, there might ideally be greater confidence regarding no concerns of problematic impacts (e.g. recreational pressure) ahead of allocation.

It is also noted that the two sites at Swardeston are in proximity to Swadeston Common CWS, but there is a reference to this in the supporting text. Commons are somewhat characteristic of the area, and so there is a need to question whether there are any general concerns around growth-related impacts.

- BRE1 (Land east of School Road, Bressingham; 40 homes) – is one of several sites with onsite or adjacent **priority habitat**. The supporting text explains: *“Frontage development of the site will result in the loss of the existing hedgerows and trees along School Road. However, the hedgerows along the southern and western boundaries, which are identified as Priority Habitats, will need to be protected...”*
- LM1 (South of School Lane and East of Burnthouse Lane, Little Melton; 35 homes) – is notable for **protected species**. The supporting text explains: *“The listed barn has the potential to contain bat roosts and the site is also within an amber zone for great crested newts. As such appropriate ecological surveys would be required with any planning application, covering, but not limited to, the habitats provided by the existing features onsite and the connectivity to wider ecological features...”*
- SPO2 (South of Station Road, Spooner Row; 25 homes) – is another site where there is a need to consider priority habitat (as understood from the nationally available dataset), and also where the plan identifies a potential opportunity to secure **enhancement**, with a view to net gain. The supporting text explains: *“In order to secure adequate visibility splays it will be necessary to remove some or all of the existing established hedgerow and mature trees along the site frontage. Where possible retention of the existing landscaping should be a priority, however replacement landscaping should be incorporated into the site layout and design if this is not possible. An area of potential traditional orchard priority habitat has been identified as lying adjacent to the western boundary of the site and opportunities to enhance this area could be considered as part development of this site...”*
- TAC1REV (Land to the west of Norwich Road, Tacolneston; 25 homes) – is an example of a site with a biodiversity value that must be understood in the context of its position in the wider landscape and contribution to functional **ecological connectivity**. The supporting text explains: *“A network of off-site ponds exists in proximity to the site development of the site should ensure ongoing connectivity between these ecological features. Also, it is noted that a previous reference to protecting a horse chestnut tree is proposed to be removed.”*
- ALP1 (West of Church Meadow, Alington; 25 homes) – is another example of a site with a need to give careful consideration to trees and hedgerows, including a **veteran tree**. The supporting text explains that *“the protection and enhancement of the existing boundary hedgerows and trees surrounding the site will be required. The Veteran Tree in the northeast corner of the site is protected by a Tree Preservation Order, and development of the site should protect and enhance its setting.”*
- EAR2 (Land north of The Street, Earsham; 25 homes) – is a new proposed allocation at the Focused Changes / Reg 19 Addendum stage. It is overall subject to limited constraint, but there is a small copse adjacent that would likely be enclosed by development and includes a **mature oak**. It is not shown on [historic mapping](#) but is shown as the intersection of two field boundaries. The oak is referenced in supporting text, and the site specific policy refers to *“trees and hedges on the site boundary [and] outside the site itself.”*
- BB1 (Corner of Norwich Road and Bell Road, Barnham Broom; 40 homes) – is one of a number of sites where there is a clear requirement for **arboriculture surveys**. The supporting text explains that *“the site is visually well contained by mature trees and hedgerows on the road boundaries. Development of this site will inevitably lead to the loss of some of this vegetation, however arboriculture surveys will be required to ensure that any loss is minimised... The small group of trees towards the southern end of the site form a mature feature which should be assessed as part of an arboriculture survey of the site.”*

Supporting text also explains: *“Particular consideration will also need to be given to the form and layout of the open space on the northwest corner of the site... balancing the need to create a sense of place in this prominent location, with the retention, where possible, of existing mature trees and hedgerows.”*

- 9.3.4 In conclusion, having taken account of the range of proposed site-specific policy it is considered appropriate to predict **moderate or uncertain positive effects** on the baseline. It is noted that the SA Report made a recommendation, which remains outstanding at the current time: *“It is recommended that there is a review of sites to ensure a consistent approach to site specific policy aimed at avoiding impact pathways between development and SSSIs, particularly where the SSSI is also internationally designated as an SPA or SAC (as is the case for THU1 at Thurlton). There are several sites that are notably closer to a SSSI / SPA / SAC than is the case for THU1, including a site at Rockland St. Mary (which is close to the River Yare) and at Gillingham / Geldeston (close to the River Waveney).”* This recommendation holds true at the current time in light of Focused Changes that direct growth to locations at Ditchingham and Swardeston in proximity to locally designated common land. However, it is recognised that no major concerns have been raised through consultation, either by Natural England or Norfolk Wildlife Trust, and that national and local development management policies would apply. Also, in respect of internationally designated sites, it is important to note that South Norfolk is part of a wider GIRAMS (Green Infrastructure and Recreational Avoidance Mitigation Strategy), which looks to mitigate the potential impacts of growth.

Focused changes at the current Regulation 19 Addendum stage

A detailed discussion of options for boosting supply is presented in Section 6.3 but focusing on just those options taken forward as Focused Changes, the primary sensitivity is at Broome and Ditchingham (a CWS common in proximity). Also, Gillingham (extension for +5 homes) is in quite close proximity to the Broads SAC.

9.4 Climate change adaptation

Objective: Support resilience to the potential effects of climate change, including fluvial and surface water flooding.

- 9.4.1 As discussed in Section 6.2, there has been a considerable focus on gathering and reflecting detailed evidence on flood risk, over the course of the plan-making process, with a range of changes made since the draft plan stage to reflect flood risk constraint. It is also the case that site specific policy has been supplemented, since the draft plan stage, to a considerable extent, to ensure clear guidance in respect of how to account for flood risk at the planning application stage.
- 9.4.2 Having made this overarching statement, the following bullet points consider select proposed allocations.
- ALP1 (West of Church Meadow, Alington; 25 homes) – is an example of a site where the proposed **site capacity** / density within the site boundary takes account of flood risk. The supporting text explains: *“Although the site is 1.87ha, the allocation is for approximately 25 dwellings, reflecting the scale and density of the adjoining Church Meadow development and the need to address flood risk issues.”*
 - DIT1REV (Land at Thwaite's and Tunneys Lane; 45 homes) – is an example of a **site boundary** having been amended to account for flood risk. The supporting text explains: *“Discussions with the Lead Local Flood Authority have identified an area of the site that is at risk of flooding during the 0.1% AEP flood event. In conjunction with the promoter of the site the site area has been drawn to minimise the impact of this constraint. It is noted that the identified surface water flowpath contributes to a wider off-site flowpath and the drainage strategy for the scheme will need to respond to this appropriately...”*
 - HAL1 (Land off Briar Lane, Hales; 35 homes) – is an important example of a site affected by **surface water flood risk**. Supporting text explains: *“Discussions with the Lead Local Flood Authority (LLFA) have identified the presence of a significant surface water flowpath in the 0.1AEP event... Diversion of the flowpath is not an acceptable design solution and a Flood Risk Assessment (FRA) will be required to determine the layout and drainage strategy for this site. Due to the relationship between VC HAL1 and the 2015 Local Plan allocation to the south a comprehensive drainage strategy would be preferred... This should be explored by the developer of the site, unless otherwise agreed with the LLFA.”*

In order to reflect this sensitivity (as well as others), just 35 homes are proposed within a 2.5 ha site.

- BRO1 (East and West of the B1332, Norwich Road, Brooke; 50 homes) – is another example of a site affected by surface water flood risk, with site specific policy set out to ensure that this issue is taken into account. The supporting text explains: *“The Stage 2 [SFRA] indicates that there is a potential for ponding... which will need to be taken in to account as part of the access arrangements and layout... A site specific FRA will be required, to demonstrate that... the development of the site does not increase the risk of surface water flooding on the site and to neighbouring properties and how the natural flood storage provided by the pre-developed site is preserved.”*

- BAW1REV (Land east of Stocks Hill, Bawburgh; 35 homes) – is another good example of site specific policy reflecting a suitably precautionary approach in respect of surface water flood risk. The supporting text explains: “A significant surface water flowpath has been identified to the south of the site, draining into the River Yare... The Lead Local Flood Authority has not raised a concern about development in this location however the drainage strategy for the site should take into consideration the... flowpath.”

9.4.3 In conclusion, having taken account of the range of proposed site specific policy it is considered appropriate to predict **neutral effects** on the baseline.

Focused changes at the current Regulation 19 Addendum stage

A detailed discussion of options for boosting supply is presented in Section 6.3 but focusing on just those options taken forward as Focused Changes, the primary sensitivity is at Ditchingham (Site DIT1REV, as discussed above), where the current proposal is to boost capacity by 10 homes.

9.5 Climate change mitigation

Objective: Continue to drive down CO² emissions from all sources by achieving high standards of energy efficiency in new development, by providing attractive opportunities to travel by sustainable means and by protecting land suitable for renewable and low carbon energy generation, including community schemes.

- 9.5.1 The discussion in Section 6.2 leads to a conclusion that there could be a risk of negative effects on the baseline, even accounting for the fact that the baseline situation is one which is premised on there being more unplanned growth. Also, the context is Strategic Policy 2 in the GNLP.
- 9.5.2 This conclusion is reached in the knowledge that – within the parameters of the Village Clusters Plan – there is potentially some flexibility to support a more ‘accessibility-led’ strategy that might be preferable from a perspective of seeking to minimise greenhouse gas emissions from transport and (potentially also) the built environment. This conclusion is precautionary, and aims to reflect the clear urgency of the issue, with a nationally declared climate emergency and a legally enshrined 2050 net zero target date and decarbonisation trajectory. South Norfolk is an example of a local authority that has yet to declare a climate emergency, however it is currently developing a decarbonisation strategy and modelling a route towards net zero, prior to setting a target. Also, as explained within the GNLP (2021):
- 9.5.3 “Norfolk County Council has adopted a target of achieving net zero carbon emissions by 2030 for council owned land and buildings and for travel. In addition, they will **work towards carbon neutrality for the county, also by 2030.**” [emphasis added]
- 9.5.4 On the same basis, it is considered appropriate to also predict **moderate or uncertain negative effects** for the plan as a whole, i.e. the preferred strategy / package of proposed allocations and site-specific policy. None of the proposed site specific policies deal directly with the matter of greenhouse gas emissions from the built environment and, whilst there are a range of transport considerations dealt with through site specific policy, these are a focus of discussion under other topic headings.

Focused changes at the current Regulation 19 Addendum stage

The discussion of options for boosting supply presented in Section 6.3 is unable to draw any firm conclusions. It could be the case that supporting additional homes at some sites boosts development viability such that there is greater potential to achieve net zero carbon development (or otherwise go beyond the requirements set out under Building Regulations), but this is highly uncertain.

9.6 Communities

Objective: Support the continued healthy and sustainable growth of South Norfolk, narrowing the gap between the areas of the District with strongest and least strong health and social outcomes.

- 9.6.1 As discussed in Section 6.2, the discussion under the ‘communities’ heading is an opportunity to explore matters over-and-above the matter of **accessibility to community infrastructure** (which is considered to be the communities-related matter of primary importance).
- 9.6.2 Having made this overarching statement, the following bullet points consider select proposed allocations.

- BAP1 (Former Concrete Batching Plant, south of Church Road, Bergh Apton; 25 homes) – has already been a focus of discussion above, but there is also a need to consider the matter of **contaminated land**. The supporting text explains: *“The Council’s Environmental Protection Team is aware that this is a brownfield site which has been subject to uses that have the potential to give rise to significant land quality issues. Having regard to this, along with the size of the site and sensitivity of residential development, it is considered that a Detailed Land Contamination Report...is required...”*
- BAR1 (Land at Cock Street and Watton Road, Barford; 20 homes) – is another part-brownfield site potentially affected by ground contamination. Supporting text explains: *“A Phase 1 and Phase 2 contamination survey be undertaken to determine the presence of any on-site contamination resulting from the former garage use of the site and to identify appropriate remediation works.”*
- BRO1 (East and West of the B1332, Norwich Road, Brooke; 50 homes) – is an example of a site where **road safety** is a consideration, given a location either side of a B-road. The supporting text explains: *“As the site sits either side of Norwich Road, access arrangements will need to ensure there is both safe access to the sites themselves, and that a safe flow of traffic is maintained on B1332. As such the preferred highways solution is a roundabout that links the two sites; a crossroads would not be acceptable, and a staggered junction may not be achievable within the available site frontages... A roundabout would also have the effect of calming speeds into the village, which is currently the transition from the national speed limit to the 30mph limit. Any alternative solution would need to be agreed with the Highway Authority at the time of any planning application.”*

There are also several other requirements, including *“a crossing point... on Norwich Road so that there is safe pedestrian route to the primary school from the eastern part of the allocation.”*

- ELL1 (South of Mill Road, Ellingham; 25 homes) – is also of note from a road safety perspective. The supporting text explains: *“It is likely that the access will need to be towards the western side of the site frontage in order for the required visibility splays to be achieved. Carriageway widening and a footway widened to 2 meters will be required across the site frontage, connecting with the existing footway and to the adjoining recreation ground. The developers of the site will also be required to work with the Highway Authority to promote an extension to the current 30mph speed limit.”*
- MUL1 (Land east of Bluebell Road and north of The Rosery, Mulbarton; 35 homes) – is of note given the need to take account of an adopted **neighbourhood plan**. The supporting text explains: *“Mulbarton Neighbourhood Plan 2015-2030 sets out the community aspirations for new development within the village, including the preferred locations for new development being centred around The Common. Following assessment of all sites submitted for consideration as part of the allocation process it became clear that those sites that may be [in accordance with the neighbourhood plan]... raised a number of other concerns... and were therefore not suitable for allocation... Whilst VC MUL1 falls outside the area defined as the ‘Heart of the Village’ in the Neighbourhood Plan it relates well to the existing settlement and is considered to acceptable in all other respects.”*

This site is also notable from an access / highway safety perspective, with the supporting text explaining: *“Vehicular and pedestrian access to the site will be possible from the east via Bluebell Road only... Furthermore, the quantum of development already served via the existing Bluebell Road restricts the scale of growth that could be achieved in this location to a maximum of 35 dwellings at this time.”*

- SWA1 (Land off Bobbins Way, Swardeston; 20 homes) – is notable as a site that has been discussed, elsewhere in this report, as ideally needing to come forward with an adjacent committed site (which is set to be a carried forward allocation in the Village Clusters Plan) as a single **comprehensive scheme**, also noting that an adjacent site is under construction and another delivered within the past ten years. Supporting text explains:

“Opportunities to provide pedestrian and vehicular connectivity between the sites should also be explored at the detailed design stage, as should the implications for the overall drainage strategies. Detailed design matters will also need to consider the relationship between these developments, providing a form and layout that compliments the adjacent schemes...”

- PSM1 (Land north of Norwich Road and west of Poppy’s Lane, Pulham St. Mary; 50 homes) – is an example of a site where a notable decision on **highways** is deferred to the planning application stage. The supporting text explains: *“In terms of access to the site, this can either be via an access off a significantly improved Poppy’s Lane... or by the creation of a new priority route through the site... which will reduce existing traffic flow along Poppy’s Lane. The former would significantly change the character of Poppy’s Lane and create a greater divide between the two green spaces at this junction (existing allotments and new space proposed in the southeast corner of the site)...”*

- THU1 (Land north of Blacksmiths Gardens, Thurlton; 12 homes) – is also notable from a **highways safety** perspective. Supporting text explains: *“For reasons of highway safety, vehicular access to the site is only permissible via Blacksmiths Gardens... the standard of road through this development will restrict the scale of development... however... a higher number of dwellings may be achievable, should an acceptable solution be agreed with the Highways Authority.”*
- ROC1 (Land south of New Inn Hill, Rockland St Mary; 25 homes) – is notable for taking careful account of **public footpath** connectivity. The supporting text explains: *“An informal footpath is currently in evidence across the site, connecting FP3 to the existing pedestrian footpaths in the village. An opportunity exists to provide a secondary footpath connection.... This should be incorporated into the site layout to maximise pedestrian connectivity of the site...”*
- HAD1 (Land south of Haddiscoe Manor Farm, Haddiscoe; 35 homes) – is one of two proposed allocations where site specific policy deals with the risk of problematic **noise pollution**. The supporting text explains: *“The site layout will reflect the proximity of the site to the A143 to protect the residential amenities of the future residents. To minimise the noise impact of vehicular traffic on residential development in this location a significant area of open space should be retained at the front of the site, adjacent to the A143. Landscaping between the new dwellings and the area of open space at the north of the site will also be required. The site design and building orientation should also have regard to the proximity of the site to the A143 and be designed to reduce the noise impact wherever possible.”*

9.6.3 Of the issues discussed above, it is appropriate to highlight highways safety as being of key importance. This has been highlighted through consultation responses received, and the Council's current Consultation Statement sets out a response as follows:

“Accessibility of the sites to local services and facilities, as well as vehicular and pedestrian access into the sites, has been a key consideration in the determination of a site's suitability for allocation in the VCHAP. One of the identified objectives of the VCHAP is the delivery of new development in a range of settlements to support and enhance the existing rural services and facilities that are already available; the proximity of a site to these local services and facilities has therefore formed an important part of the overall site assessment and selection process.

The initial site assessment included reviewing the distance of a site from existing facilities and services set out in the agreed site assessment criteria. Following this, a significant focus of the ongoing discussions with the Highways Authority (HA) was the opportunities available to create safe vehicular and pedestrian access both into and from the sites. VC ROC2 was removed from the VCHAP due to a safe vehicular access not being achievable.

It is recognised that due to the rural nature of the District the ability to achieve pedestrian footways can be limited. Within this rural context it is considered reasonable that on occasion the only possible solution will be pedestrian links along quiet rural roads with stepping off places available. It is also accepted that it may not be possible to connect a site via pedestrian footways with all existing facilities and services within a settlement/cluster.

Wherever necessary, engagement has taken place with site promoters to seek assurances that the required accesses, visibility splays and pedestrian footways can be incorporated into the delivery of the site. As appropriate the requirements of the HA have been included within the site-specific policy allocation text and all highways details will be subject to scrutiny at the detailed planning application stage by the HA to ensure that they meet appropriate standards.”

9.6.4 In conclusion, having taken account of the range of proposed site specific policy it is considered appropriate to predict **moderate or uncertain positive effects** on the baseline.

Focused changes at the current Regulation 19 Addendum stage

The discussion of options for boosting supply presented in Section 6.3 is unable to draw any notable conclusions over-and-above those presented under the Accessibility heading.

Just with regards to highways safety, it is noted that there are some proposed changes to the site specific policy for the proposed allocation at Bawburgh, with a focus on ensuring visibility splays, but also seeking to retain vegetation along the road frontage as far as possible.

Also, at Swardeston, there is a clear need for a coordinated approach to securing walking and cycling connectivity. The Village Clusters Plan explains: *“Opportunities to provide pedestrian and vehicular connectivity between the sites should also be explored at the detailed design stage...”*

9.7 Economy and employment

Objective: Support the continued provision of, and vitality of, local employment opportunities across the District whilst seeking to take advantage of new strategic opportunities, e.g. Cambridge Norwich Tech Corridor.

- 9.7.1 As discussed in Section 6, there is inherently very limited potential to draw strong conclusions under this topic heading. However, there is broad support for dispersing growth so as to support rural industries, plus employment in rural services/facilities, plus small sites are suited to smaller, local housebuilders.
- 9.7.2 In conclusion (and as per the conclusion in Section 6), broadly **neutral effects** are predicted.

9.8 Historic environment

Objective: Protect, conserve and enhance designated and non-designated assets and their settings, and contribute to maintaining and enhancing historic character through the design, layout and setting of new development.

- 9.8.1 The discussion in Section 6.2 is broadly supportive of the emerging preferred strategy / package of proposed allocations, mindful that the strategy that has emerged over time in light of detailed consideration of the historic environment evidence.
- 9.8.2 It is recognised that certain concerns were raised by Historic England through the draft plan consultation, but the Council responded to these concerns by undertaking detailed work including Heritage Impact Assessments (HIAs) and feeding this into site-specific policy. It is also important to recall that the baseline situation is one whereby there is relatively unplanned growth.
- 9.8.3 Having made this overarching statement, the following bullet points consider select proposed allocations.

- LM1 (South of School Lane and East of Burnthouse Lane, Little Melton; 35 homes) – is subject to **significant constraint**. The supporting text explains:

“The main constraint within the site is the presence of a Grade II listed barn in the southeast section, which links the two main elements of the site on School Lane and Burnthouse Lane. It will be important to protect the setting of the listed building, particularly the open aspect to the south/southeast and the connection to the wider countryside which makes an important contribution to its significance as an agricultural barn. The Historic Impact Assessment (HIA) which supports this plan identifies an area which should be kept clear of development; as such it is proposed that this part of the site should be set out as informal open space that will integrate with the wider countryside... The HIA identifies additional areas adjacent to this where the design and layout of development should respect the setting of the listed building and ensure that its significance is not diminished. As the site cannot be accessed from Burnthouse Lane, vehicular and pedestrian access will be required across this open space; however, this should be designed sympathetically to avoid a formal layout/design which would urbanise the environment. The barn itself has undergone some renovation and is used partly used for storage but requires further repair/renovation. Applications for the development of the site should also include proposals which secure the long-term future of the listed barn, which is currently used for storage...”

The supporting text concludes: *“Although the site is 3.00ha, the allocation is limited to approximately 35 dwellings, which reflects the need to keep the south-east section of the site clear of development to protect the setting of the listed barn, the protection of existing biodiversity features on site and the provision of a small off-carriageway parking area associated with the school.”*

- HAD1 (Land south of Haddiscoe Manor Farm, Haddiscoe; 35 homes) – is notable for being in close proximity to a **Grade I listed parish church**. The supporting text explains: *“To the south-west of the site, on elevated ground, is St Mary’s Church a listed building visible from the A143. The open setting of this listed building contributes to its significance, as evidenced in the Heritage Impact Assessment, and as such development on this site will be set back from the A143... The layout and design of the site will complement the setting of the Church whilst retaining the views towards it from the A143...”*
- BAR1 (Land at Cock Street and Watton Road, Barford; 20 homes) – is an example of a site where Heritage Impact Assessment (HIA) serves to highlight **limited concerns**. The supporting text explains: *“The Cock Inn lies directly opposite the site... the redevelopment of the garage site offers an opportunity to enhance the setting of this non-designated heritage asset. Sayers Farm, a listed building, lies to the south-west of the site. Retention of the existing hedgerow along the south and west boundaries will*

mitigate the impact of new development in this location. The HIA also notes that the B1108 creates a separation between the listed building and its setting and the site, further reducing the impact...

- BAW1REV (Land east of Stocks Hill, Bawburgh; 35 homes) there is an extensive village **conservation area** associated with a characteristic river valley setting. The supporting text explains: *“Bawburgh Conservation Area encompasses the central area within the village and extends as far south as the site boundary. Existing vegetation along the road frontage to the north of the site should be retained, as should the existing vegetation along the north boundary, as this contributes positively to the character of the area. The site layout and design, including landscaping and the choice of materials, should reflect the proximity of the site to the Conservation Area. In addition, archaeological finds north of the site mean investigation of the site may be required at the planning application stage...”*
- GEL1 (North of Kell’s Way, Geldeston; 20 homes) – is also constrained by an adjacent **conservation area**. The supporting text explains: *“To the east of the site is the Geldeston Conservation Area, which is focussed on the Tayler and Green ‘Kell’s Estate’ development. This development evolved over many years and worked with the topography of the location to create a clear sense of place. Development of this site should respect the form and layout of the Kell’s Estate. The Heritage Impact Statement concluded that there would be no harm to the three Grade II Listed Buildings closest to the site...”*

The supporting text goes on to explain the links to landscape considerations: *“The site rises from Kell’s Way to the northern boundary, and consideration will need to be given to the scale, height and density of development in order to... minimise the visual impact of development on the higher parts of the site, particularly from the Broads Authority area...”*

The supporting text goes on to explain: *“The allocation is for 0.76ha for up to 20 dwellings, an area that is considered to be appropriate to allow for a scheme that addresses the landscape matters noted above, as well as the standard infrastructure requirements.”*

- BAP1 (Former Concrete Batching Plant, south of Church Road, Bergh Apton; 25 homes) – is notable as a brownfield site. The supporting text explains: *“The closest cluster of dwellings, to the east on Church Road, includes a group of **listed Tayler and Green dwellings** [see further information [here](#)], and any development will need to ensure the setting of those buildings is protected and enhanced.”*

Linked to this, policy requires: *“Protection and retention of the established trees on the eastern boundary... to help visually contain the site within a wider rural landscape.”*

- BRE1 (Land east of School Road, Bressingham; 40 homes) – is an example of a site where the HIA recommends **open space** within the site boundary. The supporting text explains: *“The frontage of the site along School Road is located immediately to the north of Pine Tree Cottage, a Grade II listed building. To preserve views... an area of open space is required in the south-west corner of the site.”*
- VC BUN2 (Land opposite Lilac Farm, Bunwell Street; 20 homes) – is associated with a number of nearby heritage assets, and there is also a need to consider the local **footpath network**. The supporting text explains: *“Bunwell [footpath 5] emerges onto Bunwell Street directly opposite the site and therefore there will be some visual impact experienced by the users of this footpath. To address this, as well as to protect the residential amenities of the occupiers to the east, the policy requires an area of open space to be incorporated into the site layout within the eastern section of the site. This area of open space will also ensure that some limited views across the wider landscape are retained. If possible, in highway safety terms, the existing frontage hedgerow... should be protected and retained.”*
- HAL1 (Land off Briar Lane, Hales; 35 homes) – is of note both for proximity to a listed building and also **archaeological constraint**. The supporting text explains: *“Views across the site towards the former Hales Hospital are contained to the north section of the site. Tree coverage around this designated heritage asset restricts direct views of this building however the landscaping contributes to its setting of the building and views towards it should be incorporated into the site layout, possibly through the inclusion of single and 1.5 storey dwellings in the north-east of the site. In addition to the listed building, earlier archaeological records suggest the site is adjacent to an area that was likely to have been a significant Iron Age settlement and a significant Roman settlement. Liaison with the Historical Environment Service will be required as part of the planning application process to determine the requirement for further archaeological investigation.”*

There is also a need to note the **adjacent carried forward allocation** HAL2. The supporting text in 2023 explained: *“The site comprises the southern part of a field in between the existing main part of the village and development around the former Hales Hospital. The site has some significant changes in the topography... An application for 23 dwellings on a larger site area has been submitted and is*

currently pending determination (2022/0287). The site is adjacent to, and is currently within the same control as, allocation VC HAL1 to the north. To ensure a comprehensive form of development is achieved opportunities to maximise the connectivity between the sites should be explored as far as possible via the development management process...”

- HEM1 (Land at Millfields, Hempnall; 15 homes) – is subject to a degree of heritage constraint, and also proposed for a relatively high **density** scheme. The supporting text explains: Hempnall Mill, a Grade II listed building now in use as a community centre, is to the north-east of the site. Key views towards the mill are from Mill Road further to the north and on the approach to the site along Millfields to the east. The supporting Heritage Impact Assessment (HIA) has identified that, with appropriate mitigation measures, development in this location will not have a significant impact on the setting of the listed building and offers potential opportunities to enhance the setting of the mill if additional views are opened up to the public. Possible ways to achieve this include; single storey development, low level landscaping across the site and, if possible, the reduction in height of some of the existing vegetation....

The supporting text goes on to explain: “A site area of 0.35ha is proposed for up to 15 dwellings. Discussions with the site promoter have proposed a scale of development similar to the existing older persons housing at Millfields. As such this would likely comprise a higher number of small one- and two bedroom dwellings which would not accord with the current housing requirements as set out in the Strategic Housing Market Assessment (SHMA). Should an alternative housing mix be necessary this may reduce the number of dwellings that can be achieved on the site.”

- 9.8.4 In conclusion, having taken account of the range of proposed site specific policy it is considered appropriate to predict **moderate or uncertain positive effects** on the baseline.

Focused changes at the current Regulation 19 Addendum stage

As an initial point, it should be noted that one of the proposed changes at the current time is to reduce the capacity of a site at Tasburgh by five homes to reflect historic environment constraints (enabling an open space at the northern extent of the site). This is an existing allocation that is being rolled forward by the Village Clusters Plan.

With regards to options for boosting supply, a detailed discussion is presented in Section 6.3, but focusing on just those options taken forward as Focused Changes, there are few concerns. A key consideration is potentially at Earsham, where the HIA concludes no concerns regarding impacts to views of the Grade I listed church (~450m distant), but there is also a need to factor in some risk of an expanded scheme in the future, given that the site forms half of a field (albeit there is potential to create a defensible boundary with landscaping).

Also, the appraisal discusses Bawburgh as an inherently sensitivity village, but the proposal to expand the site boundary does not give rise to any concerns, indeed it should allow increased flexibility to explore design options.

9.9 Housing

Objective: Support timely delivery of an appropriate mix of housing types and tenures to ensure supply of high quality housing across the village clusters which meets the needs of South Norfolk residents.

- 9.9.1 The discussion in Section 6.2 is strongly supportive of the preferred strategy of dispersing growth across smaller sites, whilst also striking a balance, in terms of recognising the merits to supporting larger sites (e.g. up to ~50 homes) where appropriate (on the basis of site of village-specific considerations), even though the implication is that there is reduced argument for allocating any sites at certain village clusters (given an overall target figure of ‘at least 1,200 homes’). The appraisal presented within the Interim SA Report (2021) encouraged consideration of larger sites from a number of respects, including from a ‘housing’ perspective, specifically recommending: “Another consideration is the possibility of supporting larger sites, with a view to securing a proportion of on-site affordable housing in-line with policy and a good housing mix, potentially to include bungalows (a low density form of housing, often not favoured by developers) and potentially even specialist accommodation...”
- 9.9.2 Having made this overarching statement, the following bullet points consider select proposed allocations.

- HEM1 (Land at Millfields, Hempnall; 15 homes) – involves a notably higher **density**, given an assumed **housing mix** weighted towards smaller homes, but the supporting text explains: “A site area of 0.35ha is proposed for up to 15 dwellings. Discussions with the site promoter have proposed a scale of development similar to the existing older persons housing at Millfields. As such this would likely comprise a higher number of small one- and two bedroom dwellings which would not accord with the current housing requirements as set out in the Strategic Housing Market Assessment (SHMA). Should an alternative housing mix be necessary this may reduce the number of dwellings...”
- TAC1REV (Land to the west of Norwich Road; 25 homes) – is similarly notable in terms of the proposed density and housing mix. The supporting text explains: “A site area of 1ha has been allocated for approximately 25 dwellings. A concept drawing has been provided illustrating that this number of homes could be accommodated on the site however this layout comprises a high number of one- and two-bedroom dwellings, which does not accord with the current housing requirements as set out in the Strategic Housing Market Assessment (SHMA). Should an alternative housing mix be necessary this may reduce the number of dwellings that can be achieved on the site.”
- WOR1 (North and south of High Road, Wortwell; 12 homes) – is a smaller site, and an important example of seeking to avoid artificial sub-division of sites that could impact on the potential to require **affordable housing**. The supporting text explains: “Development of the two elements of the site will need to ensure that a policy compliant level of affordable housing is delivered...”
- SPO4 (Land at Chapel Road; 14 homes) – is a carried forward allocation with planning permission but is also notable from an affordable housing perspective. There is a need to deliver sufficient affordable housing not only to meet the policy requirement for this site, but also a nearby site that is under construction and is not set to deliver any affordable housing (there was a linked planning application).

9.9.3 In respect of **affordable housing**, a clear benefit of the Village Clusters Plan is ensuring that schemes come forward that are large enough to deliver affordable housing. However, there is a need to recall that: A) a number of the carried forward allocations will involve fewer than 10 homes, such that they will not be required to deliver affordable housing; and B) the Village Clusters Plan also supports a number of Settlement Limit Extensions, which will enable sites smaller than 12 homes. In respect of (B), these will not count towards the 1,200 dwelling target figure set through the GNLP but will help ensure that the ‘windfall allowance’ in the GNLP is achieved. Settlement Limit extensions also offer the opportunity for ‘**self-build**’ development, as required through Government policy, particularly where those sites have been proposed by the site owner who wishes to build or commission their own home.

9.9.4 Finally, in respect of **housing mix**, there is a need to consider the deletion of a policy dealing specifically with this matter, as previously proposed in the draft plan (2021). In contrast, the new proposed approach is to place reliance on the SHMA and GNLP, and only comment on housing mix in a limited number of specific cases (see bullet points above). Also, in a small number of cases **building heights** are discussed from a perspective of avoiding or mitigating landscape impacts, as discussed above (under ‘historic environment’) and below (under ‘landscape’). This proposed approach is supported, from a perspective of ensuring a clear and concise plan document and avoiding placing undue constraints on developers that could impact on delivery. The Interim SA Report (2021) encouraged consideration of site-specific requirements for bungalows, to support downsizing, but it is understood that the evidence does not allow for specific sites to be identified (other than sites suited to lower buildings in order to avoid/mitigate landscape impacts).

9.9.5 In conclusion, having taken account of the range of proposed site specific policy it is considered appropriate to predict **moderate or uncertain positive effects** on the baseline.

Focused changes at the current Regulation 19 Addendum stage

The discussion of options for boosting supply presented in Section 6.3 is unable to draw any significant conclusions but there is support for adjusting the approach at TAC1REV (Land to the west of Norwich Road, Tacolneston) in order to bring the allocation more into line with a submitted planning application. This is because the application is for 29 affordable dwellings, alongside open space, landscaping and associated infrastructure.

9.10 Land, soils and resources

Objective: Ensure the efficient use of land and maintain the integrity of minerals sites and safeguarding areas

- 9.10.1 The discussion presented in Section 6.2 focuses on the matter of avoiding the loss of 'best and most versatile' (BMV) **agricultural land**, concluding that there will almost certainly be loss at a number of the proposed allocations, but it is difficult to conclude that the effect will be 'significant'.
- 9.10.2 There are also three proposed allocations comprising **brownfield land** (and the discussions presented in Sections 5 / Appendix III and Section 6 do not serve to highlight any omission sites comprising brownfield land that are reasonably in contention for allocation under a scenario whereby there is a shift in strategy to ensure an increased emphasis on 'accessibility'). The most notable brownfield allocation is BAP1 (Former Concrete Batching Plant, Bergh Apton; 25 homes), for which the supporting text explains:
- "The site is limited to a maximum of 25 dwellings, reflecting the balance between making effective use of the available land and the need to address the cost of redeveloping a former brownfield site, against the relatively remote nature of the site and the more limited ability to walk or cycle to local services and facilities."*
- 9.10.3 In conclusion (and as per the conclusion in Section 6), broadly **neutral effects** are predicted.

Focused changes at the current Regulation 19 Addendum stage

The discussion of options for boosting supply presented in Section 6.3 is unable to draw any significant conclusions. Gillingham is associated with Grade 2 quality agricultural land, but the data is low resolution/accuracy, and the modest proposed site expansion does not generate any significant concerns.

9.11 Landscape

Objective: Protect and enhance the character, quality and diversity of the District's rural landscapes, townscapes and river valleys through appropriate design and layout of new development, including protecting the setting of the Broads.

- 9.11.1 A detailed discussion is presented in Section 6.2, with the broad conclusion that there is support for the preferred strategy, in that it is difficult to envisage a reasonable alternative strategy that performs better, but that there are still some unavoidable issues and tensions with landscape objectives.
- 9.11.2 Landscape and Visual Appraisals have been prepared for all preferred sites, such that there is site specific policy presented for a high proportion of sites aimed at avoiding or suitably mitigating issues.
- 9.11.3 Having made this overarching statement, the following bullet points consider select proposed allocations.
- 9.11.4 Firstly, consideration is given to proposed allocations in relative proximity to the Broads Authority Area:
- GIL1REV (South of Geldeston Road and Daisy Way, **Gillingham**; 40 homes) and GEL1 (North of Kell's Way, **Geldeston**; 20 homes) are nearby allocations (within the same village cluster) that are both sensitive on account of close association with the **Broads Authority Area**, and also for other reasons including the presence of nearby conservation areas. For GIL1REV, the supporting text explains:
- "The site will require a comprehensive approach to landscaping, reflecting the fact that there is only existing development on the northern boundary. Whilst largely contained in the wider landscape, the more localised impacts development could be significant. A landscaping scheme has been agreed for the existing GIL1 allocation (application ref. 2019/1013) and consideration will need to be given as to how this is carried forward under proposals for this allocation. The western boundary of the site has some established vegetation that will require protection and enhancement as necessary. Careful consideration will need to be given to the southern and eastern boundaries, which are open to the remainder of the wider field and adjoining paddocks. Particularly important will be consideration of views from the Broads Authority area to the south, at Kings Dam and beyond, and from the public rights of way Geldeston FP8 and Gillingham FP12. Consequently, a full Landscape Assessment will be required to accompany any planning application(s) for the site."*

For GEL1, the supporting text explains: *“Careful consideration will need to be given to the scale and density of development, to prevent intrusion into the wider landscape. The site is open to the existing recreation ground to the east, from which there will be views into and out of the site. The site rises from Kell’s Way to the northern boundary, and consideration will need to be given to the scale, height and density of development in order to (a) protect the residential amenity of the properties which sit at a lower level and (b) minimise the visual impact of development on the higher parts of the site, particularly from the Broads Authority area to the south. The northern boundary is the highest point of the site, and there will be some views of the site from Old Yarmouth Road; however, this boundary has some established vegetation which will need to be retained and reinforced... To the east of the site is the Geldeston Conservation Area, which is focussed on the Tayler and Green ‘Kell’s Estate’ development. This development evolved over many years and worked with the topography of the location to create a clear sense of place. Development of this site should respect the form and layout of the Kell’s Estate...”*

- ROC1 (Land south of New Inn Hill, Rockland St Mary; 25 homes) is also in close proximity to the Broads Authority Area. The supporting text explains: *“The site is within a sensitive location at a crest in the landscape, requiring careful design and landscaping to contain the visual impact. Furthermore, both PROWs have clear views towards the site and landscaping of the site will need to take into consideration the visual impact of the development from these vantage points. The site layout should also take into consideration the existing mature trees adjacent to the east boundary and it will be necessary to protect these trees during the construction phase of development. These trees are subject to a Tree Preservation Order. Developers will be required to submit an appropriate Landscape and Visual Impact Assessment (LVIA) as part of the detailed planning application and site developers are strongly recommended to liaise with the Broads Authority early in the site planning process in order to ensure appropriate viewpoints are considered at the detailed design stage.”*
- HAD1 (Land south of Haddiscoe Manor Farm, Haddiscoe; 35 homes) – is supported for a notably low density scheme, including being mindful of close proximity to the Broads Authority Area. The supporting text explains: *“The site currently provides a visual break in the settlement to the south of the A143 however existing mature trees and hedgerows along the site boundaries mean that it is contained within long views... Appropriate landscaping... including but not limited to the protection and enhancement of the existing boundary treatments, will be required due to the proximity of the site to the Broads Area.”*
- BUR1 (Land north of Staithe Road, Burgh St Peter; 12 homes) – is a notable rural site, in fairly close proximity to the confluence of the Rivers Yare and Waveney. The supporting text explains: *“Whilst the site is currently well contained within the immediate landscape it is visible from the Broads Area and as such appropriate landscaping to the north of the site will be required to minimise the visual impact of the development. To complement the existing form of ribbon development in this location, linear development only along Staithe Road will be acceptable. In order to avoid retain the rural character of the area development should be set back from the road frontage. There is an existing mature hedgerow along the site frontage however in order to facilitate safe access into the site it is possible that it will be necessary to remove this hedgerow either in part or full. Consideration should be given to shared accesses, to minimise hedgerow loss...”*

9.11.5 The above bullet points serve to highlight a range of landscape issues and serve to give an indication of the approach taken to responding to these issues through policy, informed by Landscape and Visual Impact Assessment. The following bullet points consider other proposed allocations:

- DIT1REV (Land at Thwaite’s and Tunneys Lane; 45 homes) – is an example of site that gives rise to **limited concerns** in practice, despite being located within a broad landscape area that serves to indicate that there can tend to be a degree of landscape sensitivity. The supporting text explains: *“Although the site lies within a River Valley setting it has a strong relationship with the existing built form of the settlement and will not have an adverse landscape impact.”*
- ASL1 (Land off Church Road, Aslacton; 35 homes) – is notable as a site with an **increased capacity** relative to the draft plan stage. The supporting text explains: *“Given its position adjacent to and opposite existing built development and bounded by Muir Lane to the east, the site relates well to the existing built-form of the village. The site is however flat and affords long and relatively uninterrupted views towards the Forncetts and Wacton from both Church Road and from the Public Right of Way that runs along the western boundary of the site. Whilst the development of the site would interrupt these existing views, it is not considered to have a significant detrimental impact on the landscape as it will be viewed in the context of the existing built form... To ensure the development responds appropriately to its context, the density and scale of development will need to reflect its village edge location. The trees and hedges along Muir Lane should be retained and the existing hedgerow along the west boundary*

protected. Appropriate landscaping, such as a native hedgerow, will be required along the northern boundary of the development to create a level of containment and soften the edges of the development. Provision of open green space, in the form of a village green, along the southern boundary of the site will be important to maintain an open approach to the setting of the existing village."

- ALP1 (West of Church Meadow, Alington; 25 homes) – is one of many examples of sites where site specific policy is set in respect of how **existing boundary features** should be treated. The supporting text explains: *"The site is visually well contained, but the protection and enhancement of the existing boundary hedgerows and trees surrounding the site will be required. The Veteran Tree in the northeast corner of the site is protected by a Tree Preservation Order..."*
- ELL1 (South of Mill Road, Ellingham; 25 homes) – is also notable as a site where there are challenges on account of the **lack of existing field boundaries**. The supporting text explains: *"The site is part of a larger agricultural field and, combined with retaining the gap to the recreation ground, this means the allocation has no defined physical boundaries to the south and west. Consequently, careful consideration will need to be given to the design and layout of the site which avoids an overly (sub)urban edge to the development. Consideration should be given to development facing, rather than backing, onto the open countryside, particularly as the access is likely to be to the western edge of the site..."*

The site has also been discussed above as sensitive on account of the setting of a Grade 1 listed parish church, and also for a number of other reasons. The supporting text explains:

"Achieving the visibility splays is likely to require the removal of the frontage hedgerow. This will open up views across the wider River Valley landscape to Ellingham Conservation Area and the Grade I listed St Mary's Church, both of which fall (principally) within the Broads Authority Area. To retain these views, the allocation does not fill the whole of the frontage between the existing housing and the recreation ground and consideration should be given as to how any development affects these longer distance views. Footpath Ellingham FP3 runs south-west/north-east, to the south of the site, between the village and the edge of the Broads Authority area at the old railway bridge and the site can also be seen from the surrounding road network, parts of which form part of National Cycle Route 1. When viewed from the south and west the development will be seen against the backdrop of existing housing on Mill Road, however, consideration will need to be given as to how to best mitigate the impact on any views from the Broads Authority area, the Conservation Area and the footpath and road network."

- WIC1REV (Land to the south of Wicklewood Primary School; 40 homes) – is similarly associated with quite an open, expansive landscape, and the lack of existing field boundaries creates challenges. The supporting text explains: *"The site is within a prominent plateau landform and comprises the eastern section of a larger agricultural field. The site extends between the existing northern and southern boundaries of the field. As such it is recognised that there are landscape and visual impacts associated with development of this site. However, an assessment of the context of the site has confirmed that with careful landscaping and layout this site offers an opportunity to create a key gateway entrance to the village, as well as reinstate previously lost hedgerow landscape features. To achieve these objectives there will be a particular emphasis on the soft landscaping, on-site tree planting and the layout and design of the site, as well as the retention and reinforcement of the existing natural boundaries to the north and south of the site. This landscape focus is reinforced by the organic boundaries of the site. An area of open space in the north east corner of the site will form a visual focal point around the existing village sign, reinforcing the gateway location and retaining an open aspect at the junction..."*
- BRO1 (East and West of the B1332, Norwich Road, Brooke; 50 homes) – is notable as a larger site, and also one whereby the effect of growth will be to extend the linear built form of the village, as opposed to supporting a more nucleated built form. Having said this though, the site is also **well contained**, such that there is limited concerns regarding further extension of the linear built form / development creep in the future. The supporting text explains: *"Whilst the site extends the village northwards, rather than along the east/west access axis that has been the more traditional direction for growth, the development will be contained on the west by Brooke Lodge and to the east by... the existing field boundary."*
- MUL1 (Land east of Bluebell Road and north of The Rosery, Mulbarton; 35 homes) – is located at a village that has seen significant expansion of recent years and decades, and where there is a potential concern regarding unchecked piecemeal expansion / **development creep** over time. The supporting text explains: *"Whilst VC MUL1 falls outside the area defined as the 'Heart of the Village' in the Neighbourhood Plan it relates well to the existing settlement and is considered to be acceptable in all other respects... Development on VC MUL1 will represent a limited break-out to the east of the existing settlement. However, the development will be viewed in the context of the existing residential development... As such the visual impact of VC MUL1 within the wider landscape will be limited"*

particularly with careful consideration given to the boundary treatments and landscaping along key boundaries. At present a significant hedgerow with established trees forms the southern boundary of the site along The Rosery. To maintain the rural character of The Rosery vegetation must be protected and retained as part of any scheme for the site and furthermore should be reinforced as required...

- TIV1 (Pear Tree Farm, west of The Street, Tivetshall ; 20 homes) – is also a site where there is a need to account for an existing linear built form, and where account is taken of the need to ensure a defensible long term boundary / avoid piecemeal development creep. The supporting text explains: *“The existing built-form of the village is characterised by linear ribbon development and the development of the site would represent a departure from this. However, by virtue of its position, the site will be, to some extent, screened by existing development along The Street and Mill Road and otherwise visually contained from wider views by boundary hedgerows. Moreover, it will result in a more contained form of development that avoids further intrusion into the countryside along existing roads. The existing hedgerow along the southern boundary should however be retained, reinforced and protected and the presences of bungalows along the east and north of the site will limit the density that can be achieved on site.”*
- NEE1 (Land north of High Road and east of Harmans Lane; 15 homes) – is an example of a site that will align with the prevailing **linear built form** of the area, with the proposed density reflecting an assumption of limited development away from the road frontage (the site is 0.9 ha). The supporting text explains: *“Development in this location will infill an open gap that exists in the streetscene. A linear form of development will be a sympathetic addition to the settlement.*

N.B. policy clarity on settlement / locations within settlements where there is only likely to be support for development focused on the road frontage, given a need to respect the existing linear built form, is broadly supported, as it could result in land-owners being more willing to provide land away from the road frontage for non-housing uses, e.g. strategic greenspace / open space to the benefit of the village.

Finally, in respect of the NEE1, the site is notably located within a **designated river valley** and is also notable for policy on the existing **road frontage hedgerow**. The supporting text explains: *“Although the site lies within the designated Waveney River Valley it is not connected visually to the River Waveney which lies further to the south. The topography of the site, as well as the existing pockets of woodland and tree belts, will restrict wider views into the site and reduce the wider landscape impact. Consideration will need to be given to the boundary treatments to avoid an urbanising effect. Retention of the existing hedgerow along the site frontage would be preferred but will need to be explored as part of the discussions with the Highways Authority regarding safe vehicular access into the site.”*

- STO1 (Land north of Long Lane, Stoke Holy Cross; 25 homes) – is associated with the edge of a designated river valley, and is notable for policy requirements in respect of **building heights**, and also for a requirement to reflect the **precedent** set by a recent housing scheme. The supporting text explains: *“The site is located to the south of the Tas Valley River Valley, with a small area of the site extending into this landscape designation. The visual impact arising from this site will be reduced by being seen against the backdrop of the existing settlement... Development at Harrold Place successfully integrates into the surrounding landscape and as such development on this site should reflect the form and scale of the adjoining scheme. To minimise the visual impact of the development on the approach from the east along Long Lane, dwellings should be restricted to 1 and 1.5 storey in height, unless supporting evidence at the time of the planning application confirms that 2 storey development is acceptable...”*

The supporting text concludes: *“The site is allocated for up to 25 dwellings on a site area of 1.42ha, a scale of development which is considered to be acceptable reflecting the landscape sensitivities of the site and the density of the adjoining development at Harrold Place.”*

- BAW1REV – (Land east of Stocks Hill, Bawburgh; 35 homes) – has also been discussed above, because Bawburgh is associated with notable historic environment constraint that relates to its close association with the River Yare. It is one of only a limited number of proposed allocations where there is a requirement for a **Landscape Appraisal/Assessment** to be undertaken in support of any planning application, with the supporting text explaining: *“The site is within a sensitive landscape setting and reflecting this a Landscape Appraisal will be required to inform the design and layout of the site. The site is in an elevated position within the River Valley and offers clear views to the east although existing vegetation screens views of the A47 from the site and restricts views towards Norwich. Whilst development of the site will have a strong relationship with the existing form of the settlement, particularly the modern developments in closest proximity to the site, appropriate landscaping will be required on site to address the visual impact arising in long views towards it from within the wider landscape.”*

- HAL1 (Land off Briar Lane, Hales; 35 homes) – is notable including for a clear requirement for access arrangements to avoid a **rural lane**. The supporting text explains: *“Access to the site from Briars Lane will not be permitted due to its narrow width and rural character.”*
- BUN2 (Land opposite Lilac Farm, Bunwell Street; 20 homes) – is notable for a need to take careful account of views from a **public footpath**. The 2023 plan supporting text explains: *“Bunwell FP5 emerges onto Bunwell Street directly opposite the site and therefore there will be some visual impact experienced by the users of this footpath. To address this, as well as to protect the residential amenities of the occupiers to the east, the policy requires an area of open space to be incorporated into the site layout within the eastern section of the site. This area of open space will also ensure that some limited views across the wider landscape are retained. If possible, in highway safety terms, the existing frontage hedgerow along this section of the site frontage should be protected and retained.”*
- LM1 (South of School Lane and East of Burnthouse Lane, Little Melton; 35 homes) – is another site where there is a need to account for a characteristic rural lane, plus there is a need to account for an important **landscape gap** to the neighbouring settlement. The supporting text explains:
“Whilst the site has frontages to both School Lane and Burnthouse Lane, the single point of pedestrian and vehicular access will be from School Lane. The School Lane frontage is in the heart of the village... Conversely, Burnthouse Lane is very rural in nature, with an established hedgerow, and is narrow with no footway connections to the local services and facilitates... The northern section of the site at School Lane is well contained within the landscape, particularly considering the development currently being progressed on the site immediately to the west. In contrast the Burnthouse Lane section of the site is more open to the wider landscape to the south. Protecting and reinforcing the existing planting on both the southern and western boundaries will help to retain the existing rural approach to the village from the south, and the sense of a gap between Little Melton and Hethersett.”
- TAC1REV (Land to the west of Norwich Road; 25 homes) – is notable for the need to consider a **green gap** between existing areas of built form. The supporting text explains: *“A green gap separates Tacolneston into two clusters of development, north and south along the B1113. Whilst VC TAC1 will have an impact on the open, semi-rural, character created by this gap it relates well to the existing built form to the north of the village, particularly the development at Dovedale Road, as well as the existing agricultural buildings to the west.”*
- BAR1 (Land at Cock Street and Watton Road, Barford; 20 homes) – has been discussed above as subject to **historic environment** constraint, which closely links to landscape constraint. The supporting text concludes: *“An area of 0.76ha of land is allocated for approximately 20 dwellings which is considered to be a reasonable area to allow for the constraints and infrastructure requirements noted above to be incorporated into the site layout and design, whilst also reflecting the context of the site.”*
- WOR1 (North and south of High Road, Wortwell; 12 homes) – is supported for a notably **low density** scheme, including mindful of landscape constraints. The supporting text explains: *“Due to the rising nature of the land within the river valley, broadly from south to north, the allocation could potentially be prominent in the local landscape and there are some longer distance views towards the Grade I listed St Mary’s Church, Redenhall. Therefore, consideration will need to be given to the height of potential dwellings. The sites will need to include boundary treatments that retain the rural approach to Wortwell from the west as well as in any views from footpath Wortwell FP6... including additional landscaping which could compensate for the loss of trees not covered by TPOs.”*
- BUN1 (Land to the north of Bunwell Street, Bunwell; 15 homes) – is an example of a site with a **range of issues** (albeit it is not located within a designated landscape), such that there is support only for a relatively lower density scheme (the site is 1 ha in size). The supporting text explains:
“The site forms a gateway into Bunwell on approach from the east. A Public Right of Way (Bunwell FP2) runs parallel to the site, adjacent to the eastern boundary... Bunwell is a predominantly linear settlement with small pockets of development in evidence, including most notably south of Bunwell Street opposite the site. The adjacent development to the west (2019/1542) is relatively low density comprising 9 detached dwellings in a tandem form of development. In this context the depth of the site within the landscape and the visual impact of further development on the streetscene is acceptable. The existing site is level with minimal landscaping, affording clear views across the fields to the north. Whilst development of the site will inevitably have some visual impact, new development in this location will be of modest scale and viewed within the context of the existing settlement. Boundaries that avoid the creation of a harsh settlement edge will be required for the north and east boundaries to improve the

assimilation of the site into the adjoining countryside, particularly in public views from the local footpath network. Boundaries that result in a feeling of enclosure along Bunwell FP2 should be avoided.”

- 9.11.6 In conclusion, having taken account of the range of proposed site specific policy it is considered appropriate to predict **moderate or uncertain positive effects** on the baseline.

Focused changes at the current Regulation 19 Addendum stage

A detailed discussion of options for boosting supply is presented in Section 6.3 but focusing on just those options taken forward as Focused Changes, key considerations relate to the sites at Earsham and Barford, both of which are within a locally designated river valley landscape. At Earsham, site specific policy could potentially be strengthened, by explicitly referring to the lack of any existing southern boundary to the site.

9.12 Transport

Objective: Ensure that provision of transport infrastructure reflects local population and demographic needs within and between the village clusters, promotes sustainable modes of travel where possible, connects new housing to employment, education, health and local services and maximises accessibility for all.

- 9.12.1 The discussion in Section 6.2 does not raise any significant concerns, with regards to the proposed strategy / package of proposed allocations (mindful that the baseline situation is one whereby growth comes forward in a less-coordinated way), but does tentatively suggest that an alternative strategy with an increased emphasis on ‘accessibility’ might be preferable, from a transport perspective.
- 9.12.2 Over-and-above the factors discussed in Section 6, there is also a need to consider the effect of wide-ranging site-specific policy aimed at supporting modal shift (away from use of the private car) and also ensuring safe highways access. A detailed discussion of site specific policy has been presented above, primarily under the ‘accessibility’ and ‘communities’ headings.
- 9.12.3 In conclusion, having taken account of the range of proposed site specific policy it is considered appropriate to predict **moderate or uncertain positive effects** on the baseline.

Focused changes at the current Regulation 19 Addendum stage

The discussion of options for boosting supply presented in Section 6.3 is unable to draw any significant conclusions, over-and-above the conclusions drawn under the Accessibility and Communities headings.

9.13 Water

Objective: Promote sustainable forms of development which minimise pressure on water resources, whilst maintaining and enhancing where possible the quality of the District’s rivers, lakes and other water bodies.

- 9.13.1 The discussion presented in Section 6.2 focuses on the key matter of ensuring that development within the catchment of certain Water Recycling Centres (WRCs) is phased so as to ensure that development does not come forward ahead of upgrades to the capacity of the WRC. In turn, for the site allocations in question, site specific policy states:

“Early discussions with Anglian Water are recommended regarding the capacity of the local Water Recycling Centre (WRC) to accommodate the cumulative development in the catchment, which may require the phasing of this site until the capacity is available.”

- 9.13.2 The discussion in Section 6.2 also comments briefly on the issue of development needing to demonstrate nutrient neutrality, explaining that confidence regarding the potential for development to come forward in this way has increased following the GNLP Inspectors’ Report (2024), which is satisfied that good progress has been made on a mitigation strategy and mechanisms for implementing the strategy. The Inspectors’ Report was also preceded by the following explanation with the Council’s Reg 19 Consultation Statement:

“The Council acknowledges the concerns raised relating to the introduction of Nutrient Neutrality requirements in certain areas of South Norfolk. The Council also acknowledges that these issues relate to both the impact on new development on the natural environment as well as the impact of Nutrient Neutrality on the delivery of new housing. The Council is working with neighbouring authorities and

relevant partners to establish a mitigations strategy to respond to the need to consider Nutrient Neutrality. This includes the consideration and preparation of the Norfolk Environmental Credits Joint Venture. However, the VCHAP is a long-term planning document that sets out the Councils plan for housing delivery in the Village Clusters up to 2038 as the Council is required to prepare even with Nutrient Neutrality in place. Nutrient Neutrality is not considered a material issue that could undermine the principle of development and therefore the Council is still required to produce a development plan for the area to meet the housing needs identified for South Norfolk. While Nutrient Neutrality may have an impact on the delivery of new housing in the short term whilst the mitigation strategy is being developed, it is considered that once this is in place this impact will be negated."

- 9.13.3 Finally, site specific policy is proposed for a number of sites in response to wider water-related issues that have been raised by specialists and through consultation. For example, the supporting text for Policy VC NEW1 (off Alan Avenue, Newton Flotman; 25 homes) explains: *"Potential issues with foul water capacity have been raised... consequently, the site may need to be phased beyond the first years of the plan and early engagement with Anglian Water is advised. The site is also... [within] with Groundwater Protection Zone 3, which would not preclude development, but requires early liaison with the Environment Agency..."*
- 9.13.4 In conclusion, having taken account of the range of proposed site specific policy it is considered appropriate to predict **moderate or uncertain positive effects** on the baseline.

Focused changes at the current Regulation 19 Addendum stage

The discussion of options for boosting supply presented in Section 6.3 flags possible WRC constraints/issues at Spooner Row, Ditchingham and Gillingham, but it is only Spooner Row where there is understood to be any bearing on site delivery. It is also important to note that water cycle study work is ongoing at the time of writing.

9.14 Overall conclusions

- 9.14.1 Whilst the appraisal of reasonable alternatives (Section 6) predicted that the preferred strategy (Option 1) would lead to positive effects in respect of two sustainability topics, the appraisal of the proposed submission plan as a whole – i.e. the proposed package of allocations plus site-specific policy – predicts positive effects in respect of eight topics. This reflects the fact the plan presents detailed and well-evidence site-specific policy. Also, it is important to recall that any predicted effects on the baseline reflect an assumption that the baseline involves a situation whereby the Village Clusters Plan is not adopted, and development (which is a requirement of the GNLP) comes forward in a less well coordinated way.
- 9.14.2 There are several final points to make:
- Accessibility – is a key sustainability topic / objective, with the merits of the emerging preferred strategy having been tested in considerable detail over the course of the plan-making process, including through the appraisal of reasonable alternatives. The conclusion is that the plan will result in 'significant positive effects', with this conclusion having been reached particularly mindful of: A) the changes that have been made to the plan since the draft plan stage and more recently; and B) highly detailed site specific policy covering a range of factors, including ensuring good potential to access village facilities and also realising opportunities for development to maintain and enhance village facilities. However, it remains the case that the plan does give rise to tensions with objectives around ensuring accessibility to higher order settlements.
 - Climate change mitigation – it is challenging to reach a conclusion on the effects of the Village Clusters Plan, including because there is a need to factor-in greenhouse gas emissions from both transport and the built environment. On balance, the appraisal of the proposed submission plan predicts 'moderate or uncertain negative effects', but this is quite a marginal conclusion, with there being an argument for instead predicting 'neutral' effects. The predicted negative effect aims to reflect the urgency of the issue.
 - Site specific policy – is strongly supported. A very wide range of key issues are reflected across the suite of site-specific policies, taken as a whole, but it is also the case that site-specific policy is suitably concise, with minimal repetition of text or discussion of 'non-issues for completeness'. Bold text is used within the appraisal presented above with a view to highlighting the breadth of issues covered by policy.

- Iterations – a focus of the SA process has been on highlighting potential drawbacks to the emerging preferred approach, in respect of specific sustainability topics, with a view to potentially making adjustments to the plan, whether through spatial strategy / site selection or site specific policy. For example, the Interim SA Report (2021) included a considerable emphasis on aiming to allocate sites that make use of existing land parcels (typically agricultural fields) in full, or at least make good use of existing field boundaries, so as to avoid the artificial subdivisions, and that recommendation has been actioned. There has been limited emphasis on formal recommendations, but one minor recommendation is made at the current time under ‘Biodiversity’.
- Effect characteristics – the appraisal has not sought to give systematic consideration to effect characteristics such as ‘short term versus long term’ and ‘direct effects versus indirect effects’. However the appraisal has been undertaken mindful of the need to consider the full range of potential effect characteristics. Most of the effects in question are ‘long term’, albeit there is also a need to be mindful of short term effects associated with the construction of housing sites. It is also important to note that some of the predicted effects of the plan are ‘indirect’. In particular, whilst it is difficult to pinpoint that the proposed housing growth strategy (for any given village cluster) will *directly* have the effect of supporting the viability of village services and facilities, or more generally maintaining village vitality, there is confidence that there will be an *indirect* benefit (e.g. it is understood that many village schools currently rely on ‘out of catchment’ pupils to remain viable).
- Cumulative effects – the SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to ‘cumulative effects’, i.e. effects of the plan in question in combination with other plans, programmes and projects. In practice, this is an opportunity to discuss potential long term and ‘larger than local’ effects. There are several points to raise:
 - Greater Norwich Local Plan (GNLP, 2024) – the Village Clusters Plan supports the GNLP spatial strategy, and no issues or tensions have been highlighted.
 - Broads Authority – there has been close consultation with the Broads Authority throughout the plan-making process, but it is anticipated that the forthcoming consultation stage will also provide an important opportunity for any further issues to be raised. The plan directs a notable quantum of growth to locations in relative proximity to the Broads, but a range of site specific policy is proposed to address any issues, most notably in terms of landscape impacts, and the quantum was reduced in 2023. Also, there is a need to support the vitality of Broads-edge villages and provide homes for those who work in the Broads.
 - Nutrient neutrality – is a key cross-border consideration, given the extent of sensitive river catchments. A discussion of this issue is presented in Section 5.2, including discussion of the County-wide mitigation strategy, and the detailed work that has been completed around WRC capacity.
 - Local Nature Recovery Strategies – are a requirement under the Environment Act 2021, including with a view to supporting a national Nature Recovery Network. There will likely be a need to focus attention on priority landscape that cross administrative boundaries, for example river corridors. Dispersing growth widely across smaller sites – as is a central objective of the Village Clusters Plan – potentially leads to challenges in respect of realising strategic biodiversity / nature recovery / nature network objectives, but the appraisal of the preferred spatial strategy raises few significant concerns, and important site-specific policy is proposed for sites associated with specific issues or opportunities.

Part 3: What are the next steps?

10 Plan finalisation

- 10.1.1 Once the period for representations on the Regulation 19 Addendum has finished the main issues raised will be summarised by the Council, who will then consider whether the Village Clusters Plan, as a whole, can still be deemed 'sound'. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.
- 10.1.2 At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the plan, these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).
- 10.1.3 Once found to be 'sound' the Village Clusters Plan can be adopted by the Council. At that time a 'Statement' must be published that sets out certain information including 'the measures decided concerning monitoring'.

11 Monitoring

- 11.1.1 The requirement is for this SA Report to present "measures envisaged concerning monitoring", and it is also noted that there is an increased focus on monitoring nationally, in light of the proposal to reform plan-making to ensuring a clearer focus on achieving clear 'outcomes'.
- 11.1.2 The current plan document proposes the following monitoring indicators (each with an identified performance target):
- Number of homes completed
 - Number of affordable homes completed
 - Number of planning permissions granted on allocated sites where S106 provides for policy compliant affordable housing
 - Number of planning permissions granted on allocated sites where the housing mix meets policy requirements
 - Number of Self-Build CIL exemptions
 - Net change in number of core services and facilities
 - Number of planning permission granted on allocated sites which meet specified density requirements
- 11.1.3 In-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might additionally focus on:
- Area of greenspace delivered within sites;
 - Length of hedgerow lost;
 - The nature, timing and (potentially) cost of WRC upgrades completed (and any unforeseen issues);
 - Delivery of new pedestrian footpaths (also homes delivered without connectivity to pedestrian footpaths); and
 - By way of a contextual indicator, the health of village services and facilities, perhaps most notably any capacity issues at primary schools.
- 11.1.4 However, it is recognised that there are a range of pragmatic considerations that must influence the monitoring framework that us ultimately taken forward.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

	Questions answered	As per regulations... the SA Report must include...
Introduction	What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
Introduction	What's the SA scope? What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
Introduction	What's the SA scope? What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
Introduction	What's the SA scope? What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table B: Interpreting Schedule 2 and linking the interpretation to our report structure

Schedule 2	Interpretation of Schedule 2		
The report must include...	The report must include...		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	i.e. answer - <i>What's the scope of the SA?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected		
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance		
	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues & objectives?</i>	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]	

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3.
c) The environmental characteristics of areas likely to be significantly affected;	
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) were then refined in order to establish an 'SA framework', which is presented within Section 3. With regards to explaining " <i>how... considerations have been taken into account</i> ", Section 7 explains 'reasons for supporting the preferred approach', i.e. how/why the preferred approach is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal of reasonable alternatives, whilst Section 9 presents an appraisal of the plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 9 presents recommendations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', including an explanation of reasons for focusing on the matter of spatial strategy. Section 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This SA Report is published alongside a draft version of the plan in order to inform consultation ('publication') and plan finalisation ('examination').
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This SA Report will be taken into account when making a final decision on whether to submit the plan for examination, and then will be taken into account as part of the examination.

Appendix II: The SA scope

Introduction

As discussed within Section 3, a Scoping Report was published for consultation in 2020 and then updated, thereby serving to establish the broad SA scope, although comments are welcomed on the SA scope at the current time.

The aim of this appendix is to introduce the SA scope by setting out key issues under the SA framework. It should be noted that the lists of key issues are broadly as per those presented in 2020, i.e. have mostly not been updated.

Accessibility

Support good access to existing and planned services, facilities and community infrastructure, including green infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.

Key issues:

- South Norfolk has a good network of community facilities, with settlements across the district able to support access to local healthcare, schools, recreation and essential retail.
- A hierarchy of services is apparent, with larger settlements offering a broader range of services supported by local services suitable for meeting day-to-day needs at smaller settlements.

Biodiversity

Avoid harm to South Norfolk's rich diversity of internationally, nationally and locally designated sites of biodiversity significance, as well as to sites in adjacent Local Plan areas, whilst seeking to deliver a biodiversity net gain and enhancement of habitats and habitat connectivity in all but exceptional cases.

Key issues:

- South Norfolk has areas of significant biodiversity sensitivity, including in relation to the internationally designated Broadland Ramsar site and Redgrave & South Lopham Fens Ramsar site, as well as the Broadland Special Protection Area (SPA) and four separate Special Areas of Conservation (SACs).
- There is a widespread distribution of nationally designated biodiversity sites throughout the district, including a total of 27 Sites of Special Scientific Interest (SSSIs) and one National Nature Reserve (NNR) along with a variety of locally designated sites.
- The Greater Norwich Local Plan (GNLP) identifies a number of 'Core Areas' for biodiversity enhancement within South Norfolk, as well as areas suitable for 'extending and linking fragmented habitats'. These areas could be suitable to target for biodiversity net gain measures in future.

Climate change adaptation

Support the resilience of South Norfolk to the potential effects of climate change, including by directing development away from areas at greatest risk of fluvial and surface water flooding

Key issues:

- Areas of high fluvial flood risk (Flood Zone 3) broadly follow the flood corridors of the River Yare (north west and north east part of the Plan area), River Waveney (south west and south part of the Plan area) and River Tas (central part of the Plan area).
- Surface water flood risk in the Plan area is extensive, though in most instances the areas of risk are very narrow and tightly follow the alignment of water courses. Areas of more widespread risk are connected to larger watercourses.
- Proposed development should seek to avoid building on flooding hotspots in order to better safeguard future residents and their properties against flood risk and not increase the risk to existing residents and properties.

Climate change mitigation

Continue to reduce CO₂ emissions from all sources by achieving high standards of energy efficiency in new development, by supporting decentralised energy generation, by providing attractive opportunities for sustainable travel, by locating residential development a short distance from key services and by protecting land suitable for renewable and low carbon energy generation, including community schemes, whilst recognising the changing nature of private cars with the Government's current aim of phasing out all sales of internal combustion engine cars within the lifetime of this plan.

Key issues:

- South Norfolk has relatively high per capita CO₂ emissions when compared with equivalent data at regional and national levels.
- The district ranks 13th of the 47 East of England local authority areas in terms of installed capacity from photovoltaics (solar panels), though the rate at which installed capacity is increasing has plateaued since 2016.
- Emissions from transport show signs of recent gradual increase, making it important to protect community services facilities and prevent significant increases in journeys being made by existing residents to facilities a greater distance away.
- However, ownership of ultra-low emissions vehicles is rising exponentially in South Norfolk, reflecting wider trends across the country.

Communities

Support the continued healthy and sustainable growth of South Norfolk, narrowing the gap between the areas of the district with strongest and least strong health and social outcomes, helping to maintain local services and facilitates in more rural locations, to the benefit of existing and future residents.

Key issues:

- The rate of population growth since 2001 in South Norfolk is high at around 27%, nearly twice the rate of growth seen at regional and national level.
- Overall levels of deprivation in the district appear relatively low and health outcomes are generally strong. However, within the headline data there are notable discrepancies, including significant variations in life expectancy at birth between different wards in the district.

Economy

Support the continued provision and vitality of local employment opportunities across the district whilst seeking to take advantage where possible of new strategic opportunities, such as those associated with the Cambridge Norwich Tech Corridor. Support a range of housebuilding opportunities, particularly for small and medium sized builders.

Key issues:

- A significant proportion, around 60%, of South Norfolk workers commute outside the district for employment, with most travelling to Norwich.
- However, a Covid-related uptick in home working is likely to have reduced the overall volume of out-commuting and could be supported as a long term behaviour shift through provision of high speed broadband and mobile coverage.
- South Norfolk is within the Cambridge Norwich Tech Corridor which could boost high skilled knowledge employment in the district, although this is likely to be most apparent for existing knowledge clusters at the Norwich Research Park, this may also be felt directly within the village clusters, at locations like Hethel.
- Local employment for residents of the village clusters is provided in part by a network of local centres across the district.
- Educational attainment across the district is broadly in line with that of the East of England with 31% of residents achieving Level 4 qualifications and above, though this is slightly below average attainment at a national level.

Historic environment

Protect, conserve and enhance designated, non-designated and as-yet undiscovered heritage assets and their settings, and contribute to maintaining and enhancing South Norfolk's historic character through design, layout and setting of new development.

Key issues:

- There are a broad range and significant quantity of individual heritage assets in South Norfolk, including a large number of higher-order listed buildings at Grade II* and Grade I.
- The underlying historic sensitivity of many of the district's settlements is illustrated by the presence of 52 conservation areas at settlements of all scales across South Norfolk.
- Only a relatively small number of heritage assets are considered to be 'at risk' by Historic England.

Housing

Support timely delivery of an appropriate mix of housing types and tenures to ensure supply of high quality housing across the village clusters which meets the needs of South Norfolk residents, and diversify the housing market to help maintain delivery.

Key issues:

- The Village Clusters are set a total net housing target of 1,200 dwellings by the emerging GNLP over the plan period.
- Housing delivery in the South Norfolk Rural Area has been consistently strong over several years, averaging 222 dwellings per annum (dpa) between 2011/12 and 2018/19 in relation to the JCS target of 132 dpa.
- Rates of home ownership are high across South Norfolk, with correspondingly low rates of private and socially rented tenures.

Land and soils

Ensure the efficient and effective use of land by avoiding unnecessary development on best and most versatile agricultural land and maintaining the integrity of mineral extraction sites and safeguarding areas.

Key issues:

- There are several small, concentrated parts of the Plan area which are underlain by Grade 2 'best and most versatile' (BMV) agricultural land. The majority of the rest of the Plan area is underlain by (Grade 3) agricultural land, though it is not always clear where this is subdivided into Grade 3a (i.e. BMV land) or Grade 3b (i.e. poorer quality land).
- With regards to mineral safeguarding areas, sand and gravel resources are present in the central part of the plan area, and along the valley of several of the rivers in South Norfolk.
- There are 23 brownfield land sites across the district, of which 13 already have planning permission, however few of these are in Village Cluster locations.

Landscape

Protect and enhance the character, quality and diversity of the district's rural landscapes, townscapes and river valleys through appropriate design and layout of new development, including protecting the setting of the Broads Authority area.

Key issues:

- The district partially intersects with the Broads Authority area in the district's north and east, giving rise to potential landscape sensitivity in these areas.
- Outside the Norwich fringe, the district is rural in character with many small settlements dispersed widely across a gently undulating landscape which features several characterful river valleys running through it.

Transport

Ensure that provision of transport infrastructure reflects local population and demographic needs within and between the village clusters, promotes sustainable modes of travel, connects new housing to employment, education, health and local services and maximises accessibility for all.

Key issues:

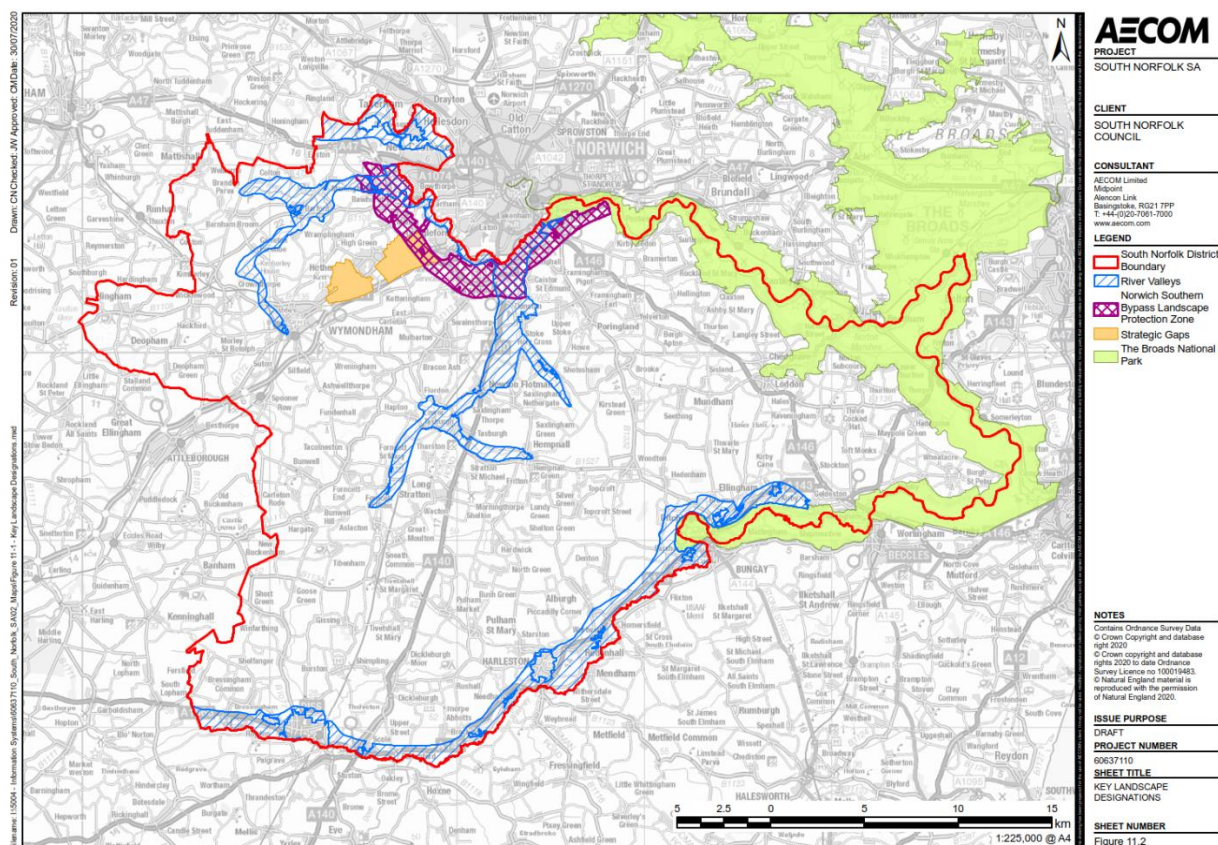
- The plan area is reasonably well connected to mainline railway network and the strategic road network, though there are no motorways in the district.
- Car dependency is high in relation to the regional and national averages, reflecting South Norfolk's rural context and dispersed settlement pattern.
- There could be longer term opportunities to expand and improve active transport corridors throughout the district in particular where connectivity with the proposed 'greenways' scheme is achievable.

Water

Promote sustainable forms of development which minimise pressure on water resources, whilst maintaining and enhancing where possible the quality of the district's rivers, lakes and other water bodies

Key issues:

- South Norfolk falls within the Broadland Rivers catchment area, which includes a total of 81 waterbodies and is upstream from the sensitive Broads National Park.
- The district has an extensive network of mostly rural, small scale Water Recycling Centres, the majority of which are anticipated to have capacity to absorb future growth. However, the strategic scale Whitlingham Trowse WRC is anticipated to receive flows from a significant scale of new development for which it does not currently have sufficient headroom capacity.
- Much of the district falls within a Nitrate Vulnerable Zone.



An example map from the Scoping Report, showing landscape designations

Appendix III: Site options GIS analysis

Introduction

The aim of this appendix is to present GIS analysis of all site options. As discussed in Section 5, this was a minor step in the process of defining reasonable alternatives for formal appraisal and consultation/publication.

N.B. the GIS analysis was undertaken in early 2023, i.e. was not updated ahead of Focused Changes work.

Methodology

This is a quantitative GIS-based exercise involving examining the spatial relationship (i.e. proximity to / percentage intersect) between all site options and a range of constraint (e.g. flood zones, designated heritage assets) and opportunity (e.g. GP surgery) features for which data is available in digitally mapped form for the district as a whole.

Given available data it has been possible to meaningfully differentiate the site options in respect of 15 measures. Each measure is discussed in turn below, and then each is assigned a column in Table A, which aims to communicate the performance of each site option in respect of each measure.

In Table A it is not possible to report the performance of each site option in precise quantitative terms (i.e. distance in metres; or percentage intersect), given available space. As such, performance is reported in summary form, using red-amber-green, where red indicates relative weak performance, and green relative strong performance.

Approach to RAG shading

The general approach is to assign a red-amber-green shading on the basis of relative performance, i.e. to reflect how the site *ranks relative to other sites*. This is easily done using the “conditional formatting” function in Excel.

However, established distance thresholds are also applied where appropriate, i.e. where the distance threshold is: A) suitably robust / agreed; and B) effective, in that the effect is to helpfully differentiate sites.

The other point to note is that a colour scale is used place of amber. This allows for more fine grained analysis.

The approach to RAG shading is discussed further below.

Limitations

All relevant and available spatial data sets have been used; however, there are data limitations. For example, on the basis of the available datasets, there is limited or no potential to appraise the ‘climate change mitigation’ merits of the site options. Also, it is generally the case that, on the basis of the available datasets, there is more limited potential to appraise the merits of site options in terms of socio-economic objectives, relative to environmental.

It is also important to state that the analysis is inherently limited on the basis that proximity / percentage intersect is often (i.e. for many objectives) a crude indicator of constraint or opportunity. For example, whilst percentage intersect with a flood risk zone is a strong indicator of actual flood risk constraint, proximity to a designated biodiversity feature is less robust as an indicator of biodiversity constraint.

In short, the limitations are significant. The implication is that the role of this analysis in the overall plan-making / SA process is necessarily limited.

Findings of the analysis

The headings below consider each of the 19 measures in turn. The aim is to give a brief insight into the spread of data shown in Table A.

Agricultural land

Of the 512 site options, 56 intersect grade 2 agricultural land and are assigned **red** in Table A.

430 sites intersect grade 3 land area assigned **amber**, whilst the remaining 26 sites are assigned **green**.

N.B. a precautionary approach is taken whereby sites are assigned red or amber even if the degree of intersect is very small. This is appropriate given recognising that the dataset is of very low resolution.

Special Protection Area (SPA)

400m is an established distance threshold, as an easy walking distance; however, only 6 of the 512 site options are within this distance. Furthermore, there are other distance thresholds that can and often are used, as broad rules of thumb when giving consideration to the potential for recreational pressure and other impact pathways.

As such, it is considered appropriate to assign **red** shading to the 16 site options within 1,000m, as a round number and a distance that is quite easily walkable for many people, for example dog walkers.

331 site options are beyond 10km from an SPA, at which distance it is fair to assume that proximity to an SPA is not a significant issue for the plan. These sites are assigned **green**.

The remaining 165 site options are shaded on a red-amber-green scale on the basis of relative distance.

Special Area of Conservation (SAC)

400m is an established distance threshold, as an easy walking distance; however, only 8 of the 512 site options are within this distance. Furthermore, as discussed, there are other distance thresholds that can be used.

As such, it is considered appropriate to assign **red** shading to the 21 site options within 1,000m, as a round number and a distance that is quite easily walkable for many people, for example dog walkers.

52 site options are beyond 10km from an SAC, at which distance it is fair to assume that proximity to an SAC is not a significant issue for the plan. These sites are assigned **green**.

The remaining 439 site options are shaded on a red-amber-green scale on the basis of relative distance.

Site of Special Scientific Interest (SSSI)

44 site options are within 500m, at which distance it is fair to highlight proximity to a SSSI as a potentially significant constraint, taking a precautionary approach. These sites are shaded **red** in Table A.

6 site options are beyond 5km from a SSSI, at which distance it is fair to assume that proximity to a SSSI is not a significant issue for the plan. These sites are assigned **green**.

The remaining 461 site options are shaded on a red-amber-green scale on the basis of relative distance.

Priority habitat

31 site options intersect priority habitat by more than 20%. These sites are shaded **red** in Table A.

70 sites intersect by less than 20% or are adjacent (within 5m) and are assigned **amber**, whilst the remaining 411 sites are assigned **green**.

The Broads National Park

44 site options are within 500m, at which distance it is fair to highlight proximity to the Broads as a potentially significant constraint, taking a precautionary approach. These sites are shaded **red** in Table A.

370 site options are beyond 5km from the Broads, at which distance it is fair to assume that proximity to the Broads is not a significant issue for the plan. These sites are assigned **green**.

The remaining 98 site options are shaded on a red-amber-green scale on the basis of relative distance.

Conservation area

59 sites options intersect or are within 20m of a conservation area. These sites are shaded **red** in Table A.

188 site options are beyond 2km from a conservation area, at which distance it is fair to assume that proximity to a conservation area is likely to be a non-issue (although there is a need to be mindful of traffic impacts). These sites are shaded **green** in Table A.

The remaining 265 site options are shaded on a red-amber-green scale on the basis of relative distance.

Grade 1 listed building

36 site options are within 200m, at which distance it is fair to say that proximity to a grade 1 listed building is potentially a significant constraint, taking a precautionary approach. These sites are shaded **red** in Table A.

85 sites are beyond 2km from a grade 1 listed building, at which distance there is little potential for the listed building to act as a significant constraint. These sites are shaded **green** in Table A.

The remaining 391 site options are shaded on a red-amber-green scale on the basis of relative distance.

Grade 2* listed building

17 site options are within 100m, at which distance it is fair to say that proximity to a grade 2* listed building is potentially a significant constraint, taking a precautionary approach. These sites are shaded **red** in Table A.

256 sites are beyond 1km from a grade 2* listed building, at which distance there is little potential for the listed building to act as a significant constraint. These sites are shaded **green** in Table A.

The remaining 239 site options are shaded on a red-amber-green scale on the basis of relative distance.

Grade 2 listed building

140 site options are within 50m, at which distance it is fair to say that proximity to a grade 2 listed building is potentially a significant constraint, taking a precautionary approach. These sites are shaded **red** in Table A.

29 sites are beyond 500m from a grade 2 listed building, at which distance there is little potential for the listed building to act as a significant constraint. These sites are shaded **green** in Table A.

The remaining 343 site options are shaded on a red-amber-green scale on the basis of relative distance.

Flood zone 2

25 site options intersect fluvial flood risk zone 2 by more than 20%. These sites are shaded **red** in Table A.

24 sites intersect by less than 20% and are assigned **amber**, whilst the remaining 463 sites are assigned **green**.

Surface water flood risk (low)

30 site options intersect the low surface water flood risk zone by more than 50%. These sites are shaded **red**.

274 site options intersect the low surface water flood risk zone by less than 5% and are shaded **green**.

The remaining 133 site options are shaded on a red-amber-green scale on the basis of relative intersect.

Primary school

Whilst it is difficult to identify a distance threshold that represents poor performance, in the context of a large rural area, on balance it is considered fair to highlight the 76 site options that are beyond 2km as performing poorly. These sites are shaded **red** in Table A.

145 site options are within 400m, which is a walkable distance. These sites are shaded **green** in Table A.

The remaining 291 site options are shaded on a red-amber-green scale on the basis of relative distance.

Secondary school

Whilst it is difficult to identify a distance threshold that represents poor performance, in the context of a large rural area, on balance it is considered fair to highlight the 42 site options that are beyond 7.5km as performing poorly. These sites are shaded **red** in Table A.

48 site options that are less than 2km distant, which is a cyclable distance. These sites are assigned **green**.

The remaining 422 site options are shaded on a red-amber-green scale on the basis of relative distance.

GP Surgery

Whilst it is difficult to identify a distance threshold that represents poor performance, in the context of a large rural area, on balance it is considered fair to highlight the 85 site options that are beyond 5km as performing poorly. These sites are shaded **red** in Table A.

Equally, it is difficult to judge a distance threshold below which sites can be judged as performing well, but on balance it is considered fair to highlight the 49 site options that are less than 1km distant as performing well. These sites are assigned **green**.

The remaining 378 site options are shaded on a red-amber-green scale on the basis of relative distance.

Summary analysis

The table below presents all site options, grouped by location, with proposed allocations unchanged from the 2023 Regulation 19 stage highlighted green, proposed allocations that are a focus of the current Focused Changes consultation highlighted yellow and the three current non-supported options for boosting supply highlighted blue.

Note on accessibility

This table is not suited to being read by a screen-reader, but the underpinning spreadsheet is available on request.

Table A: Summary GIS analysis of site options (including settlement limit extensions)

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
Aldeburgh and Denton	SN4011 - South & West Church Road															
	SN5034 - Land South Beech Farm, Tunbeck Road															
	SN5055SL - Land Opp Village Hall, Low Road															
	SN4031SL - Site Adj 1 Station Road															
	SN5054SL - Land Off Church Road															
	Denton - SN0193 - Land Surrounding Upland Farm															
	Denton - SN0168 - North Of Upland Terrace, Norwich Rd															
Alpington, Yelverton and Bergh Apton	VCALP1 - Land At Church Meadow															
	SN0529SL - Land Off Nicholson Road															
	SN0433 - Land South Wheel Road & East Reeders La															
	SN0433REV - Land In Wheel Road (south Site)															
	SN0434 - Land On Wheel Road (north Site)															
	SN0433REVA - Land In Wheel Road (south Site)															
	SN1012 - Mill Field, Mill Road															
	SN0435 - Land In Burgate Road															
	SN5002 - Land West Fortune Green															
	Bergh Apton - VCBAP1 - Former Concrete Wks, Church Rd															
	Bergh Apton - SN0210 - Church Wood, Welbeck Road															
	Bergh Apton - SN2117 - Adj To Village Hall															
	Bergh Apton - SN0203 - Land South Of Church Road															
	Bergh Apton - SN4030 - Land Rear Mill Farm Mill Road															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	Bergh Apton - SN5038 - Land Adj Greenway, White Heath Rd															
	Bergh Apton - SN0533 - East Of The Street															
	Bergh Apton - SN2023SL - Bergh Apton House, Loddon Rd															
	Bergh Apton - SN2022SL - The Dell, Sunnyside															
	Bergh Apton - SN2015SL - Town Farm															
	Bergh Apton - SN0122SL - Site At Cookes Road															
	Yelverton - SN2006 - South Of Loddon Road															
Aslacton, Great Moulton and Tibenham	Aslacton - VCASL1 - Land Off Church Road															
	Aslacton - SN2118 - South Of Sneath Road															
	Aslacton - SN1042 - Land At Church Road															
	Aslacton - SN2005 - West Of Woodrow Lane															
	Aslacton - SN0459 - Land Off Church Road															
	Aslacton - SN1041 - Adj Pottergate Street															
	Aslacton - SN0459REV - Land Off Church Road															
	Aslacton - SN3001SL - North Of Sneath Road															
	Great Moulton - VCGRE1 - Land West Heather Way															
	Great Moulton - SN0555 - Land Off Old Road Adj Hallowing Ln															
	Greatt Moulton - SN2068 - Cherry Tree Farm															
	Great Moulton - SN2003 - Former Meat Processing Plant															
	Great Moulton - SN5048 - Land East Woodrow Lane															
	Great Moulton - SN0557SL - Site Btn Ketts Fm & Orchard Fm															
	Great Moulton - SN0554SL - Land At Hallowing Lane															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	Great Moulton - SN2008SL - Overwood Lane															
	Tibenham - SN2112 - Between Black Barn Road & Mill Road															
	Tibenham - SN3008REV - East Of Pristow Green Lane															
	Tibenham - SN0365SL - Cherry Tree Road															
	Tibenham - SN2102SL - Long Row															
Barford, Marlingford, Colton and Wrampingham	Barford - VCBAR1 - Land At Cock Street & Watton Road															
	Barford - VCBAR2: Land at Chapel Street	New site submitted in 2023 and so not analysed.														
	Barford - SN0552REVC - Land At Watton Road															
	Barford - SN0552 - Land Off Watton Road															
	Barford - SN0552REV - Land Off Watton Road															
	Barford - SN0552REVA - Land At Bridge Road & Watton Road															
	Barford - SN0552REVD - Land At Watton Road															
	Barford - SN1013REV - Church Lane															
	Barford - SN0416 - Land Off Barnham Broom Road															
	Colton - SN5014 - Land North The Ugly Bug Inn															
	Colton - SN5015 - Land West Of The Ugly Bug Inn															
	Marlingford - SN0474 - Land West Of Colton Road															
	Marlingford - SN0475REVB - East Highhouse Farm Ln Colton															
	Marlingford - SN0425 - Land Off Mill Road															
	Marlingford - SN0475REVA - Sth Colton & East Highhouse F															
	Marlingford - SN0424SL - Land Off Marlingford Close															
	Marlingford & Colton - SN0476R - North Of BB Golf Club															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
Barnham Broom, Kimberley, Carleton Forehoe, Runhall & Brandon Parva	Barnham Broom - VCBB1 - Land Corner Bell & Norwich Rds															
	Barnham Broom - SN2110SLREV - South Of Norwich Road															
	Barnham Broom - SN0018SL - Land Nth Norwich Rd, Adj 101															
	Barnham Broom - SN0055 - Land East Spur Rd & South Norwich R															
	Barnham Broom - SN0196 - Land West Of Mill View															
	Barnham Broom - SN0174 - Land Off Bell Road															
	Barnham Broom - SN5057 - Land South Bankside Way															
	Barnham Broom - SN0324 - Land South West Of Norwich Road															
	Barnham Broome - SN4087SL - Land South Bell Road															
	Bawburgh - SN0002SL - Land At The Brambles, Stocks Hill															
Bawburgh	Bawburgh - VCBAW1 - Land East Stocks Hill															
	Bawburgh - SN3032 - West Of Harts Lane															
	Bawburgh - SN4071 - Land East Of Harts Lane															
	Bawburgh - SN0015SL - New Road															
	Bressingham - VCBRE1 - Land East School Road															
Bressingham	Bressingham - SN4037 - Land South Fersfield Road															
	Bressingham - SN3037 - North Of Low Road															
	Bressingham - SN5009 - Land Between 105 & 117 Common Rd															
	Bressingham - SN2054 - East Of School Road															
	Bressingham - SN3038 - South Of High Road															
	Bressingham - SN3010 - Wyevale Garden Centre															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	Bressingham - SN3036 - South Of Low Road															
	Bressingham - SN2054REVA - Land East School Road															
	Bressingham - SN2057 - North Of A1066															
	Bressingham - SN5021 - Land North High Rd & East Folly Lane															
	Bressingham - SN2079 - Fersfield Road/Folly Lane															
	Bressingham - SN4026 - Land East Of Common Road															
	Bressingham - SN5024 - Land West Common Road															
	Bressingham - SN3020 - West Of School Road															
	Bressingham - SN4033 - Land Rear 34 Common Road															
	Bressingham - SN3019SL - West Of School Road															
	Bressingham - SN3023SL - South Of Darrow Lane															
	Bressingham - SN5022 - Land East Common Road															
	Fersfield (Bressingham) - SN2053 - Adjoining Pond Farm															
	Fersfield (Bressingham) - SN2056 - Fersfield Common															
	Fersfield (Bressingham) - SN2052 - West Of The Street															
Brooke, Kirstead and Howe	Brooke - VCBRO1 - Land At Norwich Road															
	Brooke - SN0020SL - 43 High Green															
	Brooke - SN2119 - North Of High Green/west Astley Cooper PI															
	Brooke - SN5058 - Land At Brooke Lodge, Norwich Road															
	Brooke - SN0583 - Land North Laurel Farm The Street															
	Brooke - SN2018 - East Of Norwich Road															
	Brooke - SN2122 - East Of Wood Farm															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	Brooke - SN4047 - Brooke Flock Farm The Street															
	Brooke - SN0490 - Land Off Mereside															
	Brooke - SN0432REVA - Land East Norwich Road															
	Brooke - SN0432REVB - Land West Norwich Road															
	Brooke - SN0584 - Land West Of Burgess Way															
	Brooke - SN0077SL - The Field, Howe Lane															
	Brooke - SN4065SL - The Stables, Land Adj High Green/Honeypo															
	Brooke - SN0579SL - Waldor Cottage, High Green															
	Howe - SN5016SL - Land East The Green															
	Kirstead - SN2174 - East Of Kirstead Green															
	Kirstead - SN4004 - West Of Kirstead Green															
Bunwell	Bunwell - VCBUN1 - Land North Of Bunwell Street															
	Bunwell - VCBUN2 - Land Opposite Lilac Farm, Bunwell St															
	Bunwell - SN0539 - Lilac Farm, Bunwell Street															
	Bunwell - SN2126 - Adjacent 114 Bunwell Street															
	Bunwell - SN0009 - Church Farm, Church Lane															
	Bunwell - SN2004SL - South Of Church Lane															
	Bunwell - SN0001SL - Land Between Coldstream & Burnlea															
	Bunwell - SN5003SL - Land At Barhams Lane & Church Lane															
Burston, Sh'pling Giss'g	Gissing - SN0208SL - Land At Common Road															
Carleton Rode	Carleton Rode - SN4068 - Land South Flaxlands Road															
	Carleton Rode - SN0547REV - Land North Turnpike															
	Carleton Rode - SN4067 - Land West Greenways Lane															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	Carleton Rode - SN5004 - Land South Mile Road															
	Carleton Rode - SN2086 - South Of Flaxlands Road															
	Carleton Rode - SN4080 - Carleton Barn, Rode Lane															
	Carleton Rode - SN4009 - West Of Rode Lane															
	Carleton Rode - SN0438 - Land South Of Flaxlands Road															
	Carleton Rode - SN5023SL - Land West Rode Lane & Sth Mill Rd															
	Carleton Rode - SN4068SLREV - Land South Flaxlands Road															
	Carleton Rode - SN0439SL - Land West Of Rode Lane															
Ditchingham, Broome, Hedenham and Thwaite	Broome - VCBRM1 - West Of Yarmouth Rd (opp Bridge House)															
	Broome - SN0346 - Land North Of Old Yarmouth Road															
	Broome - SN0410REV - Old Yarmouth Road															
	Broome - SN4021 - South East Of Loddon Road & Sun Road															
	Broome - SN4044SL - Land Rear 126 Yarmouth Road															
	Broome - SN3004SL - Rear Of 130 Yarmouth Road															
	Ditchingham - SN2011SL - Land Off Lamberts Way															
	Ditchingham - VCDIT1 - Land BetweenThwaite Rd/Tunneys Ln															
	Ditchingham - SN0078 - Land Off Loddon Road															
	Ditchingham - SN0373 - Land BetweenThwaite Road/Tunneys Lane															
	Ditchingham - SN0345 - Land North Of Loddon Road															
	Ditchingham - SN0345REV - Land North Of Loddon Road															
	Ditchingham - SN0343 - Land Adj Wildflower Way															
	Ditchingham - SN0205SL - Land North West Scudamore Place															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
Earsham	Ditchingham - SN2011SLREV - Land Off Lamberts Way															
	Earsham - VCEAR1 - Land East Of School Road															
	Earsham - VCEAR2 - Land North The Street															
	Earsham - SN0218 - Land North The Street															
	Earsham - SN0390 - Land East Of School Lane															
	Earsham - SN5026 - Land Sth Old Railway Road & Nth The Stree															
Forncett St Mary and Forncett St Peter	Earsham - SN0390REV - Land East Of School Lane															
	Forncett - SN1002 - Forncett St Peter															
	Forncett - SN0089 - Land South Of Common Road															
	Forncett - SN1040 - Land At Mill Road/Overwood Ln/Gilderswoo															
	Forncett - SN1039SL - Kilamay Farm, Wash Lane															
	Forncett St Mary - SN0599REV - Four Seasons Nursery, St Mary															
	Forncett St Mary - SN2028 - Low Road															
	Forncett St Mary - SN0429SL - Land Off Spicers Lane															
	Forncett St Peter - SN5027 - Land Nth Station Road															
	Forncett St Peter - SN0094 - Land North Norwich Road (B1113)															
Gillingham, Geldeston, and Stockton	Forncett St Peter - SN2058 - Tawny Farm, Forncett St Peter															
	Geldeston - VCGEL1 - Land Off Kells Way															
	Geldeston - SN0207S - Land At Old Yarmouth Rd/Geldeston Hill															
	Geldeston - SN1004SL - Allotment Gardens															
	Gillingham - VCGIL1 - Land South Of GIL1 The Street															
	Gillingham - SN0274REVA - Land South A143 & A146 Roundabout															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	Gillingham - SN0274REVB - Land South A143 & A146 Roundabout															
	Gillingham - SN0021SL - South West Of Norwich Road															
	Stockton - SN0091 - Church Farm, Church Road															
Hales and Heckingham, Langley with Hardley, Carleton St Peter, Claxton, Raveningham and Sisland	Claxton - SN0530 - Land West Of Church Road															
	Hales - VCHAL1 - Land Off Briar Lane															
	Hales - SN0308 - Land Off Briar Lane															
	Sisland - SN5046SL - Land East The Cottage, St Johns Lane															
Hempnall, Topcroft Street, Morningthorpe, Fritton, Shelton and Hardwick	Hempnall - VCHEM1 - Land At Millfields															
	Hempnall - SN1015 - Land Adj Primary School, The Street															
	Hempnall - SN0147 - Land Around Alburgh Rd & Silver Green															
	Hempnall - SN1018 - Land South Of Millfields															
	Hempnall - SN2081 - West Of Field Lane															
	Hempnall - SN2046 - Corner Alburgh Road & Lundy Green															
	Hempnall - SN1016 - Busseys Loke															
	Hempnall - SN1015REV - Land Adj Primary School, The Street															
	Hempnall - SN4083 - Land Opp The Bungalow Bungay Road															
	Hempnall - SN0580 - Land At Home Farm, Alburgh Road															
	Hempnall - SN1017 - Broaden Lane															
	Hempnall - SN0178SL - Land Adj Tween Oaks, Alburgh Road															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	Topcroft - SN4012 - West Of Low Road															
	Topcroft - SN2146SL - Land West Of The Street															
	Topcroft - SN2029SL - Topcroft Street															
	Topcroft - SN5012SL - Land North Frejya, The Street															
	Topcroft - SN5056SL - Land At Gardiners Cott, Topcroft Stree															
Keswick and Intwood	Intwood - SN4081 - Land Off Intwood Road (Keswick)															
	Intwood - SN5042 - Land East Keswick Barn, Barn Lane															
	Keswick - SN2014 - Intwood Road															
Ketteringham	Ketteringham/Keswick - SN3031 - Cantley Lane															
	Ketteringham - SN0528 - Ketteringham High Street															
	Ketteringham - SN0473 - Land At Church Road															
	Ketteringham - SN0513 - Land Noth Of High Street															
Kirby Cane and Ellingham	Ellingham - VCELL1 - Land South Mill Road															
	Ellingham - VCELL2 - West Of Florence Way															
	Ellingham - SN0305REVA - Land South Mill Road															
	Ellingham - SN4018 - Land West Of Church Road															
	Ellingham - SN4054 - Land Adj 123 Yarmouth Road															
	Ellingham - SN0305REV - Land South Of Mill Road															
	Ellingham - SN0304 - South East Corner Ellingham Island															
	Ellingham -SN0303SL- South West Corner Henrys Field Mill Lan															
	Ellingham - SN0306SL - Land Adj South Lodge Old Yarmouth Rd															
	Ellingham - SN5019 - Land Adj 113 Yarmouth Road															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	Ellingham - SN4002SL - Ottos Wood, Lockhart Road															
	Kirby Cane - SN0344 - Land East Of Church Road															
	Kirby Cane - SN0348 - Land South Of Old Yarmouth Road															
	Kirby Cane - SN0396 - South Of New Gate Lane															
	Kirby Cane - SN0019SL - Site Of Old Post Office Lane															
Little Melton and Great Melton	Great Melton - SN0014 - Turnpike Field															
	Little Melton - VCLM1 - Land School Lane & Burnthouse Lane															
	Little Melton - SN1046REV - Land North Great Melton Road															
	Little Melton - SN2044 - North Of Braymeadow Lane															
	Little Melton - SN0488 - Land North School Lane															
	Little Melton SN4052 Land South School Lane/east Manor Farm															
	Little Melton - SN0340 - Land Between Watton Rd Green Ln & S															
	Little Melton - SN2044REV - North Of Braymeadow Lane															
	Little Melton - SN0182REVA - North Mill Rd, Sth Gt Melton Rd															
	Little Melton - SN0397 - Mill Road															
	Little Melton - SN5040 - Land At School Lane															
	Little Melton - SN3001 - South Of Gt Melton Road															
	Little Melton - SN0488REV - Land North School Lane															
	Little Melton - SN2044REV - North Of Braymeadow Lane															
	Little Melton - SN0591 - Land North Of School Lane															
	Little Melton - SN5041 - Land East Burnthouse Lane															
	Little Melton - SN0454 - Beckhithe Site, Little Melton Road															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	Little Melton - SN1046REVA - Glenhaven, Great Melton Road															
	Little Melton - SN3007SL - 7 School Lane															
	Little Melton - SN4058SL - Land West Burnthouse Lane															
	Little Melton - SN4072SL - Land West Burnthouse Lane															
Morley and Deopham	Deopham - SN5001 - Land East Of Church Road															
	Deopham - SN4035 - Land North Wymondham Road															
	Morley - SN1033 - Land Adj Attleborough Rd/Hill Rd															
	Morley - SN0356REV - Land East Golf Links Road															
	Morley - SN3012SLREV - Fir Grove, Deopham Road															
	Morley - SN0130SL - Land East Brecon Lodge, Golf Links Rd															
	Morley St Botolph - SN4027 - Stone Brigg/Deopham Road															
	Morley St Botolph - SN5047 - Land Betw Hall Ln & Golf Links															
	Morley St Peter - SN4041 - Land East Hill Road															
	Morley St Peter - SN4042 - Land North Norwich Rd & West Golf															
	Morley St Peter - SN4073SL - Paddock West Clearview Hookwood															
	Bracon Ash - SN2087REVA - Land South Cuckoofield Lane															
Mulbarton, Bracon Ash, Swardeston and East Carleton	Bracon Ash - SN0549 - Barracks Meadow															
	Bracon Ash - SN2087 - South Of Cuckoofield Le/east Of The St															
	Bracon Ash - SN4032 - Land East Norwich Road															
	Bracon Ash - SN0195 Land Off B1113 Norwich Road															
	Bracon Ash - SN0026SL - Jasmine Cottage, The Street															
	East Carleton - SN1037 - The Old Nursery, The Drift															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	East Carleton - SN0247 - Site Off Low Common															
	East Carleton - SN2165 - Land East Of Hethersett Road															
	East Carleton - SN4086 - Land South Rectory Road															
	East Carleton - SN0600REV - Land East Of Hethersett Road															
	East Carleton - SN2167REV - Land East Hethersett Road															
	East Carleton - SN0428 - Land Off Rectory Road															
	East Carleton - SN1058 - Wymondham Road															
	East Carleton - SN1059SL - Swardeston Lane															
	East Carleton - SN5000SL - Land North Everlsey, Rectory Road															
	Mulbarton - VCMUL1 - North Of The Rosery															
	Mulbarton - SN0315 - Land To East Of Mulbarton															
	Mulbarton - SN2038 - North Of The Rosery															
	Mulbarton - SN4059 - Corner Brick Kiln Ln & The Rosery															
	Mulbarton - SN0496REV - Land East & West Norwich Road															
	Mulbarton - SN2039 - North Of Rectory Road															
	Mulbarton - SN5005 - Land North East Carleton Road															
	Swardeston - VCSWA1 - Bobbins Way															
	Swardeston - SN0426 - Land South Of Swardeston House															
	Swardeston - SN4082 - Intwood Lane															
	Swardeston - SN0551 - Intwood Lane															
	Swardeston - SN0517 - Land Off The Common															
	Swardeston - SN0367SL - Land Off Chestnut Drive															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
Needham, Brockdish, Starston and Wortwell	Brockdish - SN4069SL - Land South Scole Road															
	Brockdish - SN0385 - Church Road															
	Brockdish - SN0464 - Land Off Mill Road, Thorpe Abbots															
	Needham - VCNEE1 - North High Rd & Harmans Ln															
	Needham - SN0156REVA - Site Opp Village Hall, High Road															
	Needham - SN0156 - Site Opp Village Hall High Road															
	Starston - SN2001SL - West Of Cross Road															
	Wortwell - SN2036 - Land Junc High Road & Low Road															
	Wortwell - VCWOR2 - Land At Mill Hill, High Road															
	Wortwell - SN5045SL - Land North East High Road															
	Wortwell - SN2121REVC - Land West Low Road															
	Wortwell - SN4084 - Land South East Low Road															
	Wortwell - SN2121REVA - High Road															
	Wortwell - SN2121REVB - Land South High Road															
	Wortwell - SN5029 - Land At Mill Hill, High Road															
	Wortwell - SN0057 - Land At Sancroft Way															
	Wortwell - SN2036REV - Land Junc High Road & Low Road															
	Wortwell - SN4066SL - Land Adj 29 Low Road															
	Wortwell - SN4063 - Mill Hill, High Road															
	Wortwell - SN2006SL - High Road															
Newton Flotman and Swainsthorpe	Newton Flotman - VCNEW1 - South Of Alan Avenue															
	Newton Flotman - SN4025 - Land Off Grove Way															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	Newton Flotman - SN0594 - Lowlands, Ipswich Road															
	Swainsthorpe - SN3002 - 11 Briar Lane															
	Swainsthorpe - SN0603REVA - Off Church View															
	Swainsthorpe - SN0191R-REVA - South Of Church Farm															
	Swainsthorpe - SN0542SL - East Of The Vale															
Pulham Market and Pulham St Mary	Pulham Market - SN0418 - Land At Cooks Field, Jocelyn Close															
	Pulham Market - SN2096 - West Of Mill Lane															
	Pulham Market - SN1024 - Ladbrokees, Tattlepot Road															
	Pulham Market - SN0407 - Colegate End															
	Pulham Market - SN2095 - East Of Colegate End Road															
	Pulham Market - SN0418REV - Land At Cooks Field, Jocelyn Cl															
	Pulham Market - SN0166 - Gosmore, Colegate End Road															
	Pulham Market - SN4085 - Land Adj Orchard Court Station Road															
	Pulham St Mary - VCPSM1 - Norwich Road/Poppys Lane															
	Pulham St Mary - SN1027 - Land East Of Goldsmith Way															
	Pulham St Mary - SN1052REV - Norwich Road/Poppys Lane															
	Pulham St Mary - SN0430 - Land Off Station Road															
	Pulham St Mary - SN0398 - The Street															
	Pulham St Mary - SN1053 - Land West Of Mill Lane															
	Pulham St Mary - SN0575 - Flanders Meadow, Station Road															
	Pulham St Mary - SN0363SL - The Maltings, Station Road															
	Pulham St Mary - SN0008SL - The Sycamores															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
Rockland St Mary, Hellington and Holverston	Rockland St Mary - VCROC1 - South New Inn Hill/west Lower Rd															
	Rockland St Mary - VCROC2 -South Of The Street [removed due to access]															
	Rockland St Mary - SN5039 - Land South The Street															
	Rockland St Mary - SN0531 - Land West Of Lower Road															
	Rockland St Mary - SN2063 - North Of The Street															
	Rockland St Mary - SN2061REV - North Of The Street															
	Rockland St Mary - SN2070 - West Of The Oaks, Bramerton Lane															
	Rockland St Mary - SN5013 - Land North New Inn Hill															
	Rockland St Mary - SN0165 - Land At Bramerton Ln & Rookery H															
Roydon	Roydon - SN5052 - Land North Old High Road															
Saxlingham Nethergate	Saxlingham Nethergate- SN5049 - Land West The Green															
	Saxlingham Nethergate - SN5051 - Land East Broaden Lane															
	Saxlingham Nethergate - SN5050 - Land North The Green															
	Saxlingham Nethergate - SN4005 - North Of Norwich Road															
	Saxlingham Nethergate - SN4007SL - South Of Norwich Road															
	Saxlingham Nethergate - SN0198SL - 6 Kensington Close															
	Saxlingham Nethergate - SN4034SL - Land West Sandpit Lane															
Scole	Scole - SN5053SL - Land North Scole Engineering, Diss Road															
Seething and Mundham	Seething - VCSEE1 - West Of Mill Lane															
	Seething - SN0406SL - West Of Seething Street															
	Seething - SN0587SL - Land West Of Seething Street North															
	Seething - SN5006 - Land South The Fen															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	Seething - SN5031 - Land At Brooke Road & Seething Street															
	Seething - SN0405 - Land North & South Brooke Road															
	Seething - SN1035 - Land South Of Wheelers Lane															
	Seething - SN0588SL - Land West Of Seething St South Site															
Spooners Row and Sutton	Spooners Row VCSP02 Station Rd/West Queensland															
	Spooners Row - VCSP01 - Land West Bunwell Road															
	Spooners Row - SN2101 - Spooners Row															
	Spooners Row - SN0445 - Land At Spooners Row															
	Spooners Row - SN2157 - North West Of London Road															
	Spooners Row - SN0447 - Land At Spooners Row															
	Spooners Row - SN0488 - Land At Spooners Row															
	Spooners Row - SN0444 - Land At Spooners Row															
	Spooners Row - SN2082 - South Of Station Road															
	Spooners Row - SN4060 - Land South Bunwell Road															
	Spooners Row - SN0446 - Land At Spooners Row															
	Spooners Row - SN0568 - Corner Station Rd & Top Common															
	Spooners Row - SN3022 - South Of Station Road															
	Spooners Row - SN0404 - Land South East Of Chapel Road															
	Spooners Row - SN0569 - Corner Bunwell Rd & Queens St															
	Spooners Row - SN2181 - School Lane															
	Spooners Row - SN5032 - Land Between Hill Rd & Bunwell Rd															
	Sutton - SN5030 - Land At Holme Farm, Sutton Street															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	Suton - SN0227 - Land At Eleven Mile Lane, Sutton															
Stoke Holy Cross, Shotesham and Caistor St Edmund & Bixley	Caistor St Edmund - SN0532 - Land East Of Norwich Road															
	Shotesham - SN0590 - Land North Of The Street															
	Shotesham - SN4013 - Shotesham Common															
	Shotesham - SN0534 - Land North Of The Street															
	Shotesham - SN4028 - Adj High View The Common															
	Stoke Holy Cross - VCSTO1 - Land To North & Adj Long Lane															
	Stoke Holy Cross - SN0524 - Land South Long Lane															
	Stoke Holy Cross - SN0197 - Land North Long Lane															
	Stoke Holy Cross - SN2091REVA - Land West Norwich Road															
	Stoke Holy Cross - SN2091 - Off Norwich Road															
Surlingham, Bramerton and Kirby Bedon	Bramerton - SN5017 - Land North Easthill Lane															
	Bramerton - SN0366REV - The Street															
	Surlingham - SN0030 - The Street															
	Surlingham - SN2016SL - The Covey															
	Surlingham - SN2010REV - Mill Road East															
	Surlingham - SN0374SL - Builders Yard And Light Industrial															
	Surlingham - SN2045SL - West Of Mill Road															
	Surlingham - SN2009SL - The Covey															
Tacolneston and Fornett End	Forncett End - SN0086 - Land North Common Road															
	Forncett End - SN2013 - Black Barn, Tabernacle Lane															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	Tacolneston - VCTAC1 - Land West Of Norwich Road															
	Tacolneston - SN0602 - Land Off The Fields															
	Tacolneston - SN0084 - Horse Meadow															
	Tacolneston - SN1057 - Land West Of Norwich Road															
	Tacolneston - SN2031 - Norwich Road															
	Tacolneston - SN4019 - South Of Hall Road															
	Tacolneston - SN4062SL - The Pelican 136 Norwich Road															
	Tacolneston - SN4061SL - The Pelican, Norwich Road															
	Tacolneston - SN0016SLREV - 122 Norwich Road															
	Tacolneston - SN0016SLREVB - Land North 122 Norwich Road															
Tasburgh	Tasburgh - VCTAS1 - Land North Church Rd & West School															
	Tasburgh - SN0005 - Hill Farm, Ipswich Road															
	Tasburgh - SN0413 - Land At Grove Lane															
	Tasburgh - SN0267REV - Cedar Holdings, Ipswich Road															
	Tasburgh - SN5028 - Land Nth Lodge Farm Cottage, Ipswich Rd															
Tharston, Hapton and Flordon	Flordon - SN0566 - Land At The Street															
	Flordon - SN5044 - Land East St Michaels View															
	Flordon - SN5043 - Land South Station Rad															
	Flordon - SN2147SL - East Of Greenways															
	Hapton - VCHAP1 - Land North The Street															
	Tharston - SN1051 - Land At The Street															
	Tharston & Hapton - SN0255 - The Laurels, The Street															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
Thurlton and Norton Subcourse	Norton Subcourse - SN0309 - Land South Loddon Road															
	Thurlton - VCTHU1 - Land North Of Blacksmiths Gardens															
	Thurlton - VCTHU2 - Land Adj Holly Cottage, West Beccles Rd															
	Thurton - SN0029 - Field 445 South Of Vale Road															
	Thurton - SN4008 - South East Of The Street															
	Thurton - SN0470 - Land Off Vale Road															
	Thurton - SN0472 - Land South Of Vale Road															
Thurton and Ashby St Mary	Thurton - SN2048 - South Of Norwich Road															
	Ashby St Mary - SN4038 - Land South Mill Road															
	Ashby St Mary - SN4040 - Land West Mill Common															
	Ashby St Mary - SN4039 - Land Off Mill Road															
	Ashby St Mary-SN0585SL - Land Opp Hall Farm Barn & Hilltop B															
Tivetshall St Mary and Tivetshall St Margaret	Tivetshalls - VCTIV1 - Pear Tree Farm, West The Street															
	Tivetshalls - SN3002SL - South Of Green Pastures The Street															
	Tivetshall - SN4006 - West Of Hales Street															
	Tivetshalls - SN2103 - North Of School Road															
	Tivetshalls - SN0318SL - West Of Pear Tree Farm, The Street															
	Tivetshalls - SN2041 - Land East Of Tivetshall															
	Tivetshalls - SN2042REVA - South Of Rectory Road															
	Tivetshalls - SN3006 - North Of Croft Lea															
	Tivetshalls - SN2042REVB - Land South Rectory Road															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
Toft Monks, Aldeby, Haddiscoe, Wheatacre & Burgh St Peter	Tivetshalls - SN0317SL - Site 1 Pear Tree Farm															
	SN4003 - East Of Common Road															
	SN5011SL - Land West The Bungalow, Lily Lane															
	SN0014SL - Land At Rushleys															
	Burgh St Peter - VCBUR1 - Land North Of Staithe Road															
	Burgh St Peter - SN4015SLREV - Land West Of Mill Road															
	Burgh St Peter - SN4010 - South Of Beccles Road															
	Burgh St Peter - SN4016 - Land East Of Mill Road															
	Burgh St Peter - SN4014 - East Common Rd & South Beccles Rd															
	Burgh St Peter - SN4015 - Land West Of Mill Road															
	Haddiscoe - VCHAD1 - Land South Manor Farm, Beccles Road															
	Haddiscoe - SN0414 - Manor Farm															
	Haddiscoe - SN0392 - Land At Junc A143 & B1136															
	Haddiscoe - SN0414SLREVA - Land North Beccles Road															
	Toft Monks - SN5035 - Land North Mardle Road															
	Toft Monks - SN0518 - Land At Post Office & Beccles Road															
	Toft Monks - SN5037 - Land At Mardle Rd & Burnthouse Lane															
	Toft Monks - SN5036 - Land West Burnthouse Lane															
	Toft Monks - SN1031 - Land South Side Of Bulls Green															
	Toft Monks - SN2005SL - West Of Woodrow Lane															
Wacton	Wacton - SN4029SL - Land South Stratton Road															
Wicklewood	Wicklewood - VCWIC2 - Land South Hackford Road															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	Wicklewood - VCWIC1- Land South Wicklewood Primary School															
	Wicklewood - SN4064 - Land At Wicklewood Nurseries, High Str															
	Wicklewood - SN2179 - High Street															
	Wicklewood - SN0535 - Land South Of Church Lane															
	Wicklewood - SN0577REVB - Land South Primary School Opt 2															
	Wicklewood - SN4045SLREVA - Land South Hackford Road															
	Wicklewood - SN4001 - Milestone Lane															
	Wicklewood - SN2179REVA - High Street															
	Wickelwood - SN5018 - Land Rear Birchwood, High Oak Road															
	Wicklewood - SN0232REV - Land South Of Low Street															
	Wicklewood - SN0249SL - Land Adj Former Workhouse-hospital															
	Wicklewood - SN1036 - Windfalls, Milstone Lane															
Winfarthing and Shelfanger	Shelfanger - SN0399BSL - East Of Winfarthing Road															
	Shelfanger - SN3011 - Havencroft Poultry Site															
	Shelfanger - SN0364 - Land South Of Heywood Road															
	Shelfanger - SN4074 - Land North Druids Lane															
	Shelfanger - SN4075 - Land West Church Road															
	Shelfanger - SN0399ASL - Rectory Road															
	Shelfanger - SN0399BSLREV - East Of Winfarthing Road															
	Shelfanger - SN4077SL - Land Off Church Road															
	Shelfanger - SN4076SL - Land Off Druids Lane															
	Winfarthing - VCWIN1 - Land West Hall Road															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	Winfarthing - VCWIN2 - Land West Mill Road															
	Winfarthing - SN4050 - Land West Hall Road															
	Winfarthing - SN0556 - Land Off Chapel Close															
	Winfarthing - SN2049SL - South Of Stocks Hill															
Woodton and Bedingham	Woodton - VCWOO1 - Land South Church Road															
	Woodton - SN0262 - Land North Of Church Road															
	Woodton - SN0268SL - Land North Church Road															
	Woodton - SN0452 - Land Off The Street															
	Woodton - SN0150 - Land Off Chapel Hill Rd & Hempnall Rd															
	Woodton - SN2130 - South Of The Street															
	Woodton - SN0278REV - Northern End, Land South Of Church Rd															
	Woodton - SN0231REV - Land At Suckling Place															
	Woodton - SN5033 - Land Between Triple Plea Rd & Chapel Hill															
	Woodton - SN2100 - North Of Hempnall Road															
	Woodton - SN1009SL - Land Junc Chapel Rd & Sunnyside															
Wreningham, Ashwellthorpe and Fundenhall	Ashwellthorpe - VCASH1 - Land To West Of New Rd															
	Ashwellthorpe - SN0598REV - Land East Of New Road															
	Ashwellthorpe - SN0239 - Land At New Road															
	Ashwellthorpe - SN0233 - Rose Farm, The Street															
	Ashwellthorpe - SN0234REV - Land Adj Rose Farm, The Street															
	Ashwellthorpe - SN0236SL - Land Rear Of 47 The Street															

Village cluster	Site	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
	Ashwellthorpe - SN0213SL - Timber Yard, The Street															
	Ashwellthorpe - SN0013SLREV - Land West Of New Rd															
	Fundehall - SN0598REV - Land East New Road															
	Fundenhall - SN0013SLREV - Land West New Road															
	Wreningham - SN2183 - South Of Wymondham Road															
	Wreningham - SN0187 - Land Adj Rosko, Wymondham Road															
	Wreningham - SN5007 - Land West Norwich Road															
	Wreningham - SN2183REV - South Of Wymondham Road															
	Wreningham - SN0431REV - Land At Hethel Road															
	Wreningham SN0431 - Hethel Road															
	Wreningham - SN5008 - Land Between Mill Ln & Ashwellthorpe R															
	Wreningham - SN0093 - Field 2484, West Of All Saints Church															
	Wreningham - SN0009SL - Land South Of High Road															

Appendix IV: Village cluster options

Introduction

The aim of this appendix is to discuss growth options / alternative approaches to growth at village clusters in turn. As discussed in Section 5, this was a step in the process of defining reasonable alternatives for formal appraisal and consultation.

Specifically, each village cluster is discussed with a view to identifying those where there is considered to be a more significant strategic choice, in respect of the approach to allocation / growth, particularly mindful of the broad strategic choice between a focus on more or less accessible growth locations.

It is not possible to review all 48 village clusters. As such, attention is focused on those that have been considered closely for one or more allocations, in that there has been a proposed allocation, or a shortlisted site, at some point in along the course of the plan-making / SA process.

The implication is that village clusters with only 'rejected' sites are not reviewed, i.e. no further consideration is given to the option of allocating one or more of the sites. This is considered a reasonable approach and in line with the principle of ensuring proportionality, as part of the process to define reasonable alternatives.⁸

Alpington, Yelverton and Bergh Apton

The two proposed allocations are unchanged from the draft plan stage, and it is important to note that Alpington is in proximity to Poringland and Norwich.

However, one of the proposed allocations (25 homes) has been highlighted throughout the plan-making / SA process as potentially more marginal, despite comprising a brownfield site with current use that is not well suited to its location (with significant landscape impacts and generating HGV traffic on rural roads), on the basis that it is circa 400m from the Bergh Apton settlement boundary, and 2km from the primary school at Alpington.

Also, there is a shortlisted omission site, which was considered closely as an option for boosting supply in 2023. This site (12 homes) is adjacent to the village pub and close to the school.

In this light, the potential for an alternative lower growth strategy for Alpington can be envisaged.

Aslacton, Great Moulton & Tibenham

The proposal is to support an additional ~22 homes, compared to the draft plan stage, leading to 47 homes in total (plus there is a carried forward allocation). This involves an expanded site at Aslacton (to include a 'village green' and offroad parking for the nearby school and church) and a new site at Great Moulton for 12 homes (contiguous with the carried forward allocation).

The site at Aslacton benefits from very good proximity to a primary school, but Aslacton is otherwise quite distant from a higher order settlement, with Long Stratton 6km by minor road, and the village is equidistant between main road corridors, although there is a bus stop adjacent to the site. The site at Great Moulton is beyond walking distance of a primary school, but is better connected to Long Stratton and other local facilities, such as the village hall and pub.

Barford, Marlingford, Colton & Wramplingham

Whilst the draft plan did not propose any allocations, the proposal at the Regulation 19 stage in early 2019 was to support an allocation for 20 homes. This comprises a small part of a larger site, which was previously shortlisted for up to 50 homes and open space. A primary school is nearby, and Barford is well-connected to Wymondham and Norwich. One other point to note is that Barford effectively 'lost' its 2015 Local Plan allocation for ~10 homes as the allocation site was found to be undeliverable at the time of the planning application.

⁸ Village clusters not discussed below, but with better accessibility credentials are: Fornsett St Mary and Fornsett St Peter (in fairly close proximity to Long Stratton, albeit via rural lanes); Keswick and Intwood (in close proximity to Norwich; however, only three site options in detached locations); Ketteringham (close to Hethersett; however, only four site options and with few village facilities); Thurton (located on the A146); and Wacton (close to Long Stratton, albeit via rural lane, and just one site option; also limited village facilities). Morley and Deopham is also a notable village cluster, where a primary school serves an extensive rural area between Wymondham, Attleborough and Hingham. Whilst there are no shortlisted site, one site does stand-out as being in close proximity to the primary school. However, as explained within the draft plan (2021): "The site is considered to be an unreasonable option for allocation, even with a reduced number of dwellings. The site is remote from all services, apart from the school, and is detached from the main part of the settlement. There is no safe walking route to the other village facilities."

The SA Report (2023) explained: *“A more comprehensive scheme remains an option, noting the proposal to make significant land available for open space (there is already a sports pitch at Barford, but accessible open space otherwise appears to be quite limited). However, it is clearly the case that the effect would be to break a clear / defensible landscape boundary, namely Back Lane, and would be highly visible on the approach to Barford, where a Grade II listed building currently marks the start of the village, and has a clear rural / village edge setting. Also, any development to the west of Back Lane would need to follow development of the proposed allocation to the east, which is in different ownership and requires redevelopment of an existing business, in order to secure pedestrian and cycle access to village facilities (and the sites are in different ownership).”*

Subsequently, the option of supporting this ‘more comprehensive scheme’ was explored as an option for boosting supply in late 2023, although it was then not taken forward (i.e. is not a proposed allocation at the current time).

Also, a new site option submitted in early 2023, consulted on as an option for boosting supply in late 2023 and is now being taken forward, i.e. it is one of the sites that is the subject of the current Focused Changes. The capacity of this site is now 40 homes (previously lower) and it will deliver a replacement village hall.

In conclusion, whilst Barford was flagged in the SA Report as a village where there could be merit to exploring higher growth, it is not clear that this holds true at the current time, in light of the current Focused Changes.

Barnham Broom (and others)

The proposal is to support 40 homes at the proposed allocation from the draft plan stage, instead of 45. There is strong support for this site, including as it will assist with delivering a significant junction upgrade.

Aside from the proposed allocation, there are notably several sites that were shortlisted at the draft plan stage, including three that are near adjacent, such that the possibility of a combined scheme, with a view to securing planning gain, might be explored (e.g. access along the nearby River Yare). However, it is important to note that site visits in 2022 served to raise concerns regarding landscape sensitivity.

One of these sites was explored as an option for boosting supply in late 2023, but then not taken forward.

Overall, there is little reason to suggest that this village cluster is suited to accommodating more than 40 homes. Norwich, Wymondham and Dereham are all within fairly close proximity, but there is a limited bus service. The possibility of growth here – potentially in combination with growth at Barford and Bawburgh – supporting an improved bus service might be envisaged, but this is likely not realistic in the context of the Village Clusters Plan.

Bawburgh

The proposed allocation is for 35 homes, as per the draft plan stage (but the current proposal, via Focused Changes, is to extend the site boundary), but there is a new proposal to support a settlement limit extension.

Bawburgh is in close proximity to Norwich, but there is a limited bus service, and it is constrained on account of an extensive conservation area, characteristically located on both sides of the River Yare, with the bridge a scheduled monument. To the west, along the River Yare corridor, are the two village clusters discussed above, hence the possibility of linked growth along the corridor is a theoretical possibility.

However, of the two rejected sites that are reasonably well-located to the village core, one is significantly affected by flood risk, whilst the other is relatively distant from the primary school, with no pedestrian footway, plus there are long distance views across the Yare valley.

On balance the current conclusion remains as per that reached in the SA Report (2023), which is that there is an ‘accessibility’ argument for exploring higher growth. However, it is recognised that concerns have been raised through consultation regarding the need to caution against growth at Bawburgh given its sensitivities.

Bressingham

This village is an example of a parish with a loose settlement pattern. The draft plan supported two allocations, for a total of 52 homes, that would serve to consolidate built form near to the primary school; however, the smaller of the two previously preferred sites (SN3019SL) is now rejected due to flood risk.

The proposed allocation is for 40 homes, whilst the one shortlisted site (SN4037) might deliver 25 homes. Allocation of both sites in combination would amount to a high growth strategy, but is potentially an option for consideration, noting that the shortlisted site is near adjacent to the primary school, and given the proximity of Diss and several bus services. A Grade II listed building is adjacent to the shortlisted site but is somewhat set back and screened from the road. A surface water flow path starts on the shortlisted site, and there is potential that development of the site could improve the off-site situation.

Brooke, Kirstead & Howe

The draft plan proposed two adjacent allocations for a total of 50 homes, whilst the current proposal is to combine these into a single allocation (also for 50 homes). Additionally, a new proposal, since the draft plan stage, is to support a small settlement limit extension.

As such, the proposal is to support a relatively high growth strategy, which is supported in accessibility terms, as Brooke is a relatively large village, located on a B-road and less than 3km from Poringland.

There is one shortlisted site, but its capacity is ~25 homes, which limits any argument for additional allocation. Also, the site is adjacent to a Grade II listed building (that marks the edge of the conservation area), there are potentially pedestrian access challenges and it would represent a further linear extension on the north/south axis, when supporting a nucleated built form might be a preferable strategy.

Bunwell

The proposal is to support 35 homes across two sites, as opposed to a proposal for 25 homes at one site, as previously presented at the draft plan stage. The allocation from the draft plan stage is retained, but is supported for 15 homes, instead of 25, to reflect surrounding densities / the edge-of-village location.

Additionally, a previously shortlisted site is now proposed for allocation (20 homes). This site is well-located in built form / landscape terms, but the village primary school is some distance away (albeit connected by pedestrian footpath) and Bunwell is a relatively rural settlement, with a limited bus service.

Ditchingham, Broome, Hedenham & Thwaite

The proposed allocation at Ditchingham is retained from the draft plan stage, but the current proposal via Focused Changes is to increase capacity from 35 to 45 homes. Also, through Focused Changes the proposal is to allocate a previously shortlisted site at Broome for 12 homes. Finally, there is a settlement extension at Ditchingham (which was extended subsequent to the draft plan stage).

There is a notable shortlisted site at Ditchingham located adjacent to the settlement limit extension, which would deliver a fairly modest number of homes, and would be located within very close proximity to Bungay (easy cycling distance). However, the site is subject to some constraints, with onsite trees and an irregular shape.

Also, with regards to the proposed allocation at Ditchingham, consideration has been given to further boosting its capacity such that the field in question is allocated in its entirety, and given the village benefits from very good connectivity to Bungay, and a primary school is near adjacent. However, flood risk is a constraint and there is an identified need for offsite junction improvements in the area.

Earsham

The proposal at the draft plan stage was to support an allocation for 35 homes, to the west of the village, as well as a settlement extension to the east of the village. Then at the Regulation 19 stage in 2023 the proposal was to delete the allocation, and to extend the previously proposed settlement limit extension, such that it becomes an allocation for 25 homes, as better access to this site has now been proposed by the site promoter.

The change of strategy was described in the SA Report as *“potentially supported, from an accessibility perspective, as the new proposed allocation (to the east of the village) is located adjacent to the village primary school and is in close proximity to Bungay. Conversely, the previously proposed allocation is less well-related to the village and is more distant from Bungay (albeit this is fairly marginal). Earsham is generally well-connected, given a location on the A143, and given proximity to Bungay. However, it is fair to suggest that allocation of both sites (for 70 homes) would potentially amount to over-allocation, in the context of the Village Clusters Plan. Also, with regards to the site to the west, the proposal at the draft plan stage was for a 35 homes scheme on part of a field, such that there could be an argument for allocating the entire field, e.g. for 70 homes. The potential to deliver planning gain might be envisaged, but this scale of growth is unreasonable.”*

Most recently, via Focused Changes, the proposal is to reintroduce the site to the west, but for 25 homes. It is recognised that this reduces the argument for further growth at Earsham (to align with accessibility objectives).

Gillingham, Geldeston, Stockton

The two proposed allocations, for a total of 55 homes, are broadly unchanged from the draft plan stage. The only change is a proposal via Focused Changes to extend and boost capacity at one of the sites by five homes.

There is an argument for focusing growth at Gillingham, instead of dispersing an element of growth to the more rural village of Geldeston, as Gillingham has relatively strong ‘accessibility’ credentials (although it is noted that the proposed allocation at Geldeston benefits from direct access to the bus route between Beccles and Diss).

The shortlisted sites at Gillingham are subject to significant flood risk; however, there could be merit to giving close consideration to those areas of undeveloped land around Gillingham that are not affected by flood risk, also noting recent delivery of improvements to the nearby service station the A143 / A146 junction (on the main Norwich/Beccles bus route), which have provided a new direct walking / cycling link to Gillingham village.

Hales, Heckingham (and others)

Following the draft plan stage the decision was taken to significantly extend the boundary of the proposed allocation (to 2.5 ha), but retain the capacity at 35 homes, such that there might be the potential to deliver additional homes. However, it is not clear that this is the case, as there are a range of constraints to account for as part of site design (surface water flood risk, landscape and a nearby listed former Hales hospital). There is also a need to consider a significant existing committed site (23 homes) which is adjacent to the new proposed allocation.

In terms of accessibility, Hales is well linked to Loddon, including via an offroad cycle path, where there is a good range of employment and services, including a secondary school. Hales is otherwise distant to higher order centres but has a good bus service (with bus pull-ins, and recently delivered new shelters).

Hempnall (and others)

Following the draft plan stage the decision was taken to delete one of the two previous allocations due to flood risk, leaving one allocation for 15 homes. The only shortlisted site is the previous proposed allocation, which is adjacent to the primary school, but the Hempnall is otherwise quite a rural village, with Long Stratton ~6.5km by car. The Interim SA Report (2021) noted a possible degree of historic environment constraint, as well as flood risk.

Kirby Cane & Ellingham

The draft plan proposed three allocations for a total of 49 homes, but one of those allocations was subsequently rejected due to flood risk and lack of active promotion. Also, following the draft plan stage the decision was taken to extend one of the proposed allocations, such that it delivers 25 homes (now that the extent of easements along the route of a high pressure pipeline have been established), leading to a current proposal for 37 homes in total.

The extended allocation is supported in that it would make better use of the available land, and because the site is close to a primary school. However, Kirby Cane / Ellingham is potentially less well-connected than is the case for Ditchingham / Broome to west (in proximity to Bungay) and Gillingham to the east (in proximity to Beccles). Both of these villages have been discussed above.

Little Melton & Great Melton

Following the draft plan stage the decision was taken to support a 35 home allocation to the south of the village, instead of a 25 home allocation to the east of the village, as previously proposed. The new proposed site relates very well to the village core, with the primary school adjacent. An adjacent site is under construction (30 homes), and the recent Hethersett northern strategic urban extension is nearby (but there is no footpath connectivity).

Despite a modestly increased quantum of homes relative to the draft plan stage, there remains the possibility of considering higher growth, given close proximity to Norwich and Hethersett (albeit the bus service is limited). Proximity to Barford and Bawburgh (discussed above) is also noted. One option could be a higher density scheme, with the current proposal for just 35 homes across 3 ha, but a Grade II listed barn within the site is a clear constraint.

There are also shortlisted sites to the east of the village, but there would be a clear risk of over-allocation, mindful of recent (to the west) and ongoing (to the south) housing growth, whilst allocating just small parts of these sites would give rise to a risk of piecemeal growth.

Little Melton is a good example of a village where there is a need to ensure a strategic and long term perspective, with a view to ensuring new housing growth delivered alongside commensurate investment in infrastructure.

Mulbarton, Bracon Ash, Swardeston & East Carleton

Following the draft plan stage the decision was taken to support five fewer homes across the two new allocations (with the larger of the two allocations being at Mulbarton). Most recently, via Focused Changes, the proposal is to boost the capacity of an existing allocation at Swardeston (being rolled forward through the Village Clusters Plan) by ten homes, and it is important to note that this site is adjacent to the new proposed allocation.

There is no primary school at Swardeston, such that there might be a sole focus of growth at Mulbarton, where there is also a GP surgery. However, Swardeston is close to Norwich and on a good bus route.

Also, at Swardeston there is a degree of concern regarding piecemeal growth leading to issues or missed opportunities, noting not only the current proposed allocation and adjacent existing committed site, but also two adjacent recently delivered sites. Having said this though, there is an opportunity for the removal of a number of former plant nursery buildings which are no longer in use.

There is also a concern regarding piecemeal expansion of Mulbarton, which expanded from a hamlet surrounding a common to a relatively large village (in the local context) in the 20th Century and has seen further significant growth over the past ~20 years. The village has expanded away from B1113, potentially leading to an inherent concern regarding transport connectivity and, whilst a very large amount of land is available that might deliver further eastwards expansion, there is a concern regarding unchecked 'sprawl' across quite a flat landscape.

Mulbarton also has an adopted Neighbourhood Plan which seeks to focus growth on smaller sites in the 'Heart of the Village' near to the common. However, sites here are constrained in a number of respects.

Needham, Brockdish, Starston & Wortwell

This village cluster is quite sensitive in landscape terms, given close association with the River Waveney. There are two proposed allocations, for a total of 27 homes, including a site for 12 homes at Wortwell that was introduced following the draft plan stage.

This site does not make use of existing field boundaries, and there is a nearby public footpath, but it is not clear that they give rise to any significant concerns from a landscape perspective.

Perhaps more significantly, the site arguably performs quite poorly from an accessibility perspective, given that Harleston, where schools and other facilities are located, is beyond 2km to the west, and higher order settlements are some way distant (although the village itself does have a well-used village hall, a pub and garden centre/café).

In comparison, the proposed allocation at Needham performs better in accessibility terms, as Harleston is much closer (accessible via a footway) and the village hall is nearby.

Newton Flotman, Swainsthorpe

The strategy is unchanged from the draft plan stage, namely allocation of a single site for 25 homes at Newton Flotman, in close proximity to the village primary school. Newton Flotman is near equidistant between higher order settlements but connected by a good bus service along the A140, and there is also notably a GP surgery.

The proposed allocation is not associated with any headline constraints, and the only shortlisted site is potentially associated with access challenges. It is also located in close proximity to the proposed allocation, and there is also a need to consider that the 2015 Local Plan allocation yet to be developed.

Pulham Market and Pulham St Mary

The draft plan proposed two allocations for 70 homes, but subsequently the decision was taken to delete one of the allocations which was withdrawn by the promoter (20 homes), leaving a single allocation for 50 homes.

These are two closely linked historic villages, each associated with a Grade I parish church and quite a high density of listed buildings. There is a good range of local services and facilities, including a doctors surgery, but the villages are otherwise in a fairly rural location, with Harleston 5+km distant. As such, the strategy of reduced growth is broadly supported, from an accessibility perspective.

The remaining allocation is located within walking distance of the primary school (via a footpath / cycleway along the Harleston Road) and, as a larger site, might support some investment in local infrastructure (in this instance, enhanced green space is a focus), to the benefit of the village / villages. Given its location, the effect of development might be to support the joint functioning of the two villages.

Rockland St Mary, Hellington & Holverston

Rockland St. Mary is a linear settlement, closely associated with the Broads, and in quite close proximity to Norwich. The village benefits from a better range of services than many, with a shop/Post Office, GP surgery, village hall, primary school, pub and public transport access to Norwich. Maintaining the viability of this local offer potentially serves as a significant argument in support of growth.

The proposed strategy of two allocations for a total of 50 homes was unchanged following the draft plan stage. However, one of the sites for 25 homes was then deleted following the Regulation 19 publication stage (2023) due to access issues (and this then triggered the need for Focused Changes aimed at boosting supply). The SA Report had also flagged that this site did not perform very well from a perspective of supporting growth in accordance with the current built form, and ensuring landscape containment, including by utilising existing field boundaries. Also, the report noted that it is associated with higher ground, with possible views from footpaths to the south.

The remaining proposed allocation is less well-related to the primary school and the peak time bus service to Norwich, hence is overall considered to perform quite poorly from an accessibility perspective. In this light the SA Report (2023) flagged Rockland St Mary as potentially being suited to lower growth, from an accessibility perspective. However, this argument is clearly now much less strong given the loss of one of the two sites.

Seething & Mundham

The draft plan proposed two allocations for a total of 32 homes, as well as two settlement limit extensions. The proposal is now to delete the larger of the two allocations, due to a change in proposals from the site promoter which would not be consistent with the VCHAP, leaving one allocation for 12 homes.

This strategy is potentially broadly to be supported, from an accessibility perspective, as Seething is a notably rural village, with Loddon 4km to the east and a limited bus service. However, of the two sites proposed for allocation at the draft plan stage, it is the site no longer supported that is better located, from an accessibility perspective, with the remaining allocation ~900 from the primary school and bus stop.

In this light, there is the option of not supporting any allocation at this village cluster. However, this is a notably small village to support a primary school, hence long term viability of the school could be a factor.

Spooner Row

The proposed strategy of two allocations for a total of 40 homes was unchanged from the draft plan stage, but the most recent proposal, via Focused Changes, is to increase the capacity of one of the sites from 15 to 35 homes, resulting in 60 homes at the village in total.

Spooner Row is somewhat unique, from an accessibility perspective, as there is a rail station, which is an important consideration, albeit there is currently only one service per day to Norwich and Cambridge. Also, the village is close to Wymondham and Attleborough, and there is a regular bus service, although these are mainly on the nearby B1172 main road, rather than through village itself.

In this light, there is an 'accessibility' case for higher growth; however, no shortlisted sites have been identified. A very extensive area of land is available and being promoted for development, but the option of strategic growth is unreasonable, in the context of the Village Clusters Plan.

One option could feasibly be to expand the smaller of the two proposed allocations (i.e. the one that is not proposed for expansion via Focused Changes), which is notably adjacent to the village primary school. However, it is noted that the primary school is small, seemingly having expanded little from its original Victorian or Edwardian extent.

Stoke Holy Cross (and others)

The proposed strategy of one allocation for a total of 25 homes at Stoke Holy Cross is unchanged from the draft plan stage. The proposed allocation is very close to the village primary school, and Poringland is only ~2km to the east, plus the village is in quite close proximity to Norwich, with a bus service through the village.

The village has seen significant expansion to the east over recent years, and the proposed allocation would amount to something of a 'rounding off' of this expansion. Following this allocation, it appears that the eastwards expansion would have occurred in broadly three stages, over the past circa ten years, hence the question arises as to whether a preferable approach might have involved a more coordinated, strategic approach to growth, in order to secure maximum investment in infrastructure. For example, it is noted that there is a low density of footpaths, with the River Tas corridor is not accessible.

Tacolneston, Forncett End

The proposed strategy of one allocation at Tacolneston for a total of 20 homes is unchanged from the draft plan stage, although the most recent proposal, via Focused Changes, is to extend the site boundary. The proposed site is in close proximity to a primary school, but is otherwise in a notably rural location, given links to higher order settlements and also noting that some village facilities are beyond easy walking distance. The village is located on the B1113, but there is a limited bus service (the possibility of coordinated growth along this corridor, in order to support an improved service, might feasibly be considered, e.g. noting Mulbarton / Swardeston to the north).

Tasburgh

The proposed strategy is broadly unchanged since the draft plan stage, but the capacity of the proposed allocation has now twice been reduced (for a total of ten homes), particularly given historic environment constraints.

The proposed allocation will provide land for a primary school expansion, and Tasburgh is well-connected, with a regular bus service along the A140 to Norwich and Long Stratton. Also, there is limited historic environment constraint in some respects, with the bulk of the village having developed over the latter half of the 20th Century.

However, there are significant historic environment constraints to the west, a flood risk zone to the south and the A140 serves as a logical boundary to the east. This leaves land to the north, but there is only one small rejected site in this area. On this basis the conclusion was reached that there is no clear case for higher growth.

Tharston, Hapton, Flordon

Whilst the draft plan proposed a 12 home allocation at Hapton, which is a notably small village supporting a primary school, the decision was subsequently taken not to allocate this site.

This decision was supported from an accessibility perspective, as Hapton is a notably rural village, plus the site has biodiversity constraint. Also, it is noted that the deleted allocation would have involved development of a small part of a larger field, with a public footpath adjacent. Furthermore, it would also have involved development close to a notable bend in the primary road through the village.

Conversely, there is a need to consider possible implications for the long-term viability of the village primary school.

Thurlton & Norton Subcourse

The proposal is to support two allocations for a total of 27 homes, whilst the draft plan had proposed allocation of just one of these sites, for 12 homes.

The proposed change is perhaps questionable from an accessibility perspective, as Thurlton is quite a rural settlement, with the secondary school at Loddon around 10km away by road, and there is a limited bus service; plus there is a need to consider the fact that there has been recent growth.

Hales, to the west, is potentially a preferable growth location from an accessibility perspective, but there is a lack of suitable promoted sites, with none shortlisted. Having said this, Thurlton has a range of basic facilities, including community shop/post office, primary school, pub, and village hall.

Thurlton is adjacent to the Broads, but both sites appear to be well contained in built form / landscape terms, and otherwise subject to limited constraint. However, it is noted that the newer proposed allocation would extend a recently delivered scheme, and there could be the potential for further extension still, should the current highways constraints be overcome. Hence there is a question regarding a risk of sub-optimal piecemeal growth over time.

Tivetshall St Mary and Tivetshall St Margaret

The proposed strategy is broadly unchanged from the draft plan stage, with the proposal now to support 20 homes instead of 25 homes at the one proposed allocation, partly reflecting the aspirations of the Neighbourhood Plan.

This parish is associated with a dispersed and somewhat linear settlement pattern, but the proposed allocation appears to be associated with some merit in terms of relationship with the existing built form, and containment in the landscape. The village is notably rural, with higher order settlements ~7km distant.

There is the option of a further reduced scheme, from an accessibility perspective. However, in other respects there appears to be little argument for taking this approach.

Toft Monks, Haddiscoe (and others)

This is quite a unique village cluster, located at the eastern extent of the district, with the Broads on two sides, which is a major barrier to movement (such that there is no direct road connectivity to nearby Lowestoft). The primary school is also notably located between settlements on the A-road at the western extent of the cluster, namely between Toft Monks and Haddiscoe.

The proposed strategy changed slightly following the draft plan stage, with the allocation at Haddiscoe increasing from 25 to 35 homes and an allocation at Burgh St. Peter for 12 homes which remains unchanged. The uplift at Haddiscoe is associated with onsite requirements relating to setting development back from the A143, for heritage and amenity reasons, as well as the highways requirements for the site.

The allocation at Burgh St. Peter can be questioned, from an accessibility perspective, as this is a very rural, with Beccles around 11km by road. Also, there is not necessarily an argument for housing growth here in order to support viability of the local primary school, given that the school also serves other villages.

However, the site in question appears to perform well in other respects, in that there are no headline constraints and development would align strongly with the prevailing linear built form of the area. Also, the village appears to have seen very limited recent housing growth (according to historic satellite imagery). The site is close to the village hall, local pub and employment at Aldeby Business Park.

Wicklewood

The proposed strategy of two allocations for a total of 42 homes was unchanged following the draft plan stage, but most recently the proposal via Focused Changes is to expand one of the sites and boost capacity by ten homes.

Both sites are associated with a degree of sensitivity, with the smaller site near adjacent to the Grade I listed parish church, and the larger site prominent in the landscape and comprising a small part of a much larger field.

However, growth at a level of 5 homes is broadly supported, from an accessibility perspective, given very good links to Wymondham, including by a regular bus service, and given that the village primary school is adjacent to both sites. Wicklewood also links closely to the B1108 corridor to Norwich, via Barford and Little Melton.

Winfarthing & Shelfanger

The broad strategy is unchanged from the draft plan stage, with two allocations at Winfarthing for a total of 40 homes, although the capacity of one of the sites has increased and the other decreased.

Winfarthing is located on a B-road, around 5km from Diss, but it is understood that there is only a daily bus service. Shelfanger is notably closer to Diss, but the primary school is located at Winfarthing.

One of the sites would extend linear built form, whilst the other is visible on the approach to Winfarthing (including a Grade II listed building and the historic primary school) along the B1077, hence there could be an argument for reduced growth, given fairly poor accessibility to a higher order settlement.

Woodton & Bedingham

Following the draft plan stage the proposed strategy has changed from allocating two sites north and south of Church Road to a single site, to the south. The proposal is to increase the capacity of this allocation site from 25 homes to 50 homes, such that the overall increase in new homes via allocations increases from 40 to 50 homes.

Woodton is quite remote from a higher order settlement, but it is located on the B1332, along which there is a regular bus service between Norwich, Poringland and Bungay. Also, and importantly, the site offers an opportunity to enhance footpath connectivity within the village and secure land for enhanced recreational and education facilities. It will be important to give careful consideration to the appropriate scale of growth, mindful of existing field boundaries, balancing the desire for a comprehensive scheme / investment in local infrastructure with the need to deliver an appropriate scale of growth to a rural village.

Wrenningham, Ashwellthorpe & Fundenhall

Whilst the draft plan proposed two sites for a total of 37 homes, the new proposal is to delete the allocation at Wrenningham, leaving a single allocation at Ashwellthorpe, where the proposal is now to support 15 homes, rather than 12 as previously proposed.

Ashwellthorpe is only ~4km from Wymondham, and a new development recently came forward delivering a new village hall and recreation facilities; however, there is no regular bus service, and the primary school is some way distant, at Wrenningham. Also, Lower Wood SSSI is close to the proposed allocation.

With regards to the previously proposed allocation at Wrenningham, the primary school would have been near adjacent, and Wrenningham is understood to have a better bus service than Ashwellthorpe, but the site is affected by surface water flood risk and constrained highways. Also, the primary school appears to be in a constrained location, such that expansion (if necessary) might be challenging.

On balance, there is limited argument for assuming allocation through the appraisal of reasonable alternatives.

Conclusion on village cluster alternatives

The analysis presented above was first undertaken ahead of the Regulation 19 stage (2023) and led to a conclusion that 25 village clusters could be identified where there was a case for taking an alternative approach, involving either lower or higher growth, aimed at improving the performance of the Village Clusters Plan in respect of 'accessibility' objectives. This was reported in the SA Report (2023), and there are three key points to note:

- Firstly, conclusions are heavily influenced by 'accessibility' merits of villages / village clusters, but also account is taken of available site options and constraints. Tasburgh is one example of this.
- Secondly, whilst the discussion focuses primarily on accessibility to higher order centres / services / facilities, it has not been possible to undertake detailed work to differentiate the village clusters (let alone individual villages or sites) in this respect. For example, it has not been possible to undertake detailed work to understand the precise nature of bus services (also, and in any case, bus services are subject to change).
- Thirdly, it is inherently challenging to categorise village clusters, villages and proposed / potential locations for growth in terms of 'accessibility' merits because there is a need to not only account for accessibility to a higher order centre, but also factor-in links to village cluster services and facilities, considerations around the need to maintain the long term viability of local services and facilities, and potential to deliver new facilities.

The conclusions on village clusters from the SA Report (2023) are presented in Table 5 1, above.

At the current time those conclusions broadly still hold true, although given the current proposed Focused Changes there are a number of settlements where it is no longer clear that the previous conclusion holds true.

As such, Table 5.2, above, records a number of instances it is now "unclear" whether there is a case for higher or lower growth on accessibility grounds.

Appendix V: Options to boost supply

Introduction

The aim of this appendix is to introduce the work undertaken in 2023 that led to the identification of 'options for boosting supply' that were then a focus of appraisal and consultation under Regulation 18 in late 2023. These same options are also a focus of at the current Regulation 19 Addendum Stage (see Section 6.3, above).

Context

An important starting point was a list of eleven village clusters where – following work in 2022 – there was considered to be a reasonable alternative involving boosting supply, particularly from an 'accessibility' perspective:

- Barford etc (connectivity to Wymondham and Norwich)
- Bawburgh (proximity to Norwich)
- Bressingham (proximity / reasonable links to Diss combined with a possible site-specific opportunity)
- Brooke etc. (connectivity to Poringland; N.B. tentative)
- Ditchingham etc. (connectivity to Bungay combined with a possible site-specific opportunity)
- Earsham (connectivity to Bungay; N.B. tentative)
- Gillingham etc. (connectivity to Beccles; N.B. particularly a focus at Gillingham itself)
- Hales etc. (connectivity Loddon combined with a possible site-specific opportunity N.B. tentative)
- Little Melton etc. (very good proximity to Norwich and Hethersett)
- Mulbarton etc. (possibly the option of focusing growth solely at Mulbarton, where the primary school is located)
- Spooner Row (given a train station, albeit with a limited service)

This list provided useful context but did not serve as a set of strict parameters. Whilst these village clusters were judged in 2022 to be associated with a potential higher growth option (relative to the proposed approach) from an accessibility perspective, there are other perspectives / objectives that must also feed-in. Also, the reality is that concluding on the 'accessibility' merits of growth options is not straightforward, as has been discussed.

Introducing options

There are three categories of options for boosting supply. Each is considered in turn below.

New options

An immediate starting point is new options not previously assessed, comprising both entirely new sites submitted to the council at the Regulation 19 stage and existing site options for which the site promoter submitted a significant amendment. **One site is taken forward** and four sites are rejected, namely:

- SN6002 (Needham; 0.9 ha) - does not relate well to the village, density could be out of character and access may be difficult due to road curvature. The village cluster was not flagged in the SA Report (see list above).
- SN5017 REVA (Bramerton; 0.72 ha) – does not appear to have much relationship with established built form. Access to the site would be challenging. The village cluster was not flagged in the SA Report.
- SN0531 REVA (Rockland St Mary; 0.73 ha) – there is not a strategic case for boosting supply at Rockland St Mary and this site is exposed to the open countryside and does not relate well to the village.
- SN5039 REVA (Rockland St Mary; 1.31 ha) – as above, plus the site promoter has not been able to demonstrate that a suitable access can be achieved.

Existing shortlisted omission sites

The next port of call is the list of existing shortlisted omission sites. These are omission sites that were given close consideration over the course of plan-making prior to January 2023. Presenting shortlisted omission sites was a key focus of the consultation at the Regulation 18 stage, and the status of a site as shortlisted was a consideration as part of the process of defining reasonable alternatives within both the Interim SA Report and the SA Report.

As of 2023 there were 32 shortlisted omission sites, but the majority can be rejected for relatively clear cut reasons. In most instances sites are rejected due to site specific issues/constraints. However, in a small number of cases reasons for rejection include strategic considerations relating to accessibility. This is most notably the case for SN4048SL at Hapton (previously a preferred site), with officers' reasons for rejection as follows:

"... services in the village are very limited and the nature of the cluster means that the site is more likely to be reliant on services/facilities in Long Stratton (which already has substantial strategic growth allocated), as such it would not be supporting local, rural services, as envisaged by the Village Clusters document."

This leaves **five sites taken forward** to Section 4.

Looking across the list of rejected sites, the only point to note is three rejected sites at Little Melton which, as discussed above, was flagged within the SA Report (2023) as a settlement that could potentially be suited to higher growth from an accessibility perspective, given proximity/links to Norwich. There are three shortlisted omission sites that could feasibly be allocated, in addition to the feasible option of boosting supply via an increased density at the one proposed allocation. Of these three sites, attention focuses on SN4025, which was a proposed allocation at the Regulation 18 stage. However, flood risk is a constraint to access, and it is generally the case that there are no identified village-specific opportunities to be realised by supporting modest higher growth (beyond new homes).

Existing allocations

The final port of call is then existing allocations associated with the potential to modestly boost the site capacity, whether via: A) an extension to the site boundary (i.e. allocating a greater proportion of the land submitted as available); or B) an increasing the assumed development density within the existing site boundary.

This is something that has been encouraged throughout the SA process, essentially with a view to supporting comprehensive schemes that result in maximum opportunity to negotiate with land-owners and secure 'planning gain'. In particular, there has been an emphasis throughout the SA process on making good use of existing field boundaries where possible, rather than allocating parts of fields which can give rise to a risk of further piecemeal development in the future with opportunities missed around planning gain.⁹

Work undertaken by South Norfolk DC officers led to the identification of **seven sites to take forward**.

With regards to rejected 'sites' (specifically, existing allocations where the option of boosting supply is not taken forward), a number of sites are of note because: A) there is feasibly the option of an expanded (involving available land); and B) they are located at a village cluster 'flagged' in the SA Report (see above).

These rejected sites are listed below (alongside officers' reasons for rejection, quoted in full):

- VC BRO1 (Brooke; 2.2 ha; 50 homes) – "Although the site east of the B1332 is relatively unconstrained and could be extended further east, this would take the rear boundary beyond existing properties, with a subsequent landscape impact and possible heritage impact... Further land to the west has not been promoted..."
- VC EAR1 (Earsham; 1.3 ha; Up to 25) – "Further land was promoted to the east/south-east, but this would create and awkwardly shaped site that clearly encroaches into the river valley and potentially the setting of The Close and views of All Saints Church to the south (both Listed Buildings)."
- VC LM1 (Little Melton; 3 ha; 35 homes) – "Increasing density of the site could impact the on-Listed Building within the site. Much development has occurred in Little Melton due to a previous lack of 5YHLS and a further significant increase in numbers would be disproportionate to the village size at this time."
- VC MUL1 (Mulbarton; 1.5 ha; 35 homes) – "NCC Highways have placed a clear limit on the highway capacity of Bluebell Road, which is the only appropriate access to this site."
- VC SWA1 (Swardeston; 1 ha; 20 homes) – "The allocation focusses on reuse of the previously developed element of the site, extension to the east would be a clear break out from the pattern of development established by the recently constructed development to the south and the carried forward allocation to the north..."
- VC BRA1 (Bacon Ash; 0.9 ha; 20) – "A previously refused planning application has demonstrated that there would be unacceptable impacts from extending the site further south."

⁹ The SA Report (2023) explained: "... the Interim SA Report (2021) included a considerable emphasis on aiming to allocate sites that make use of existing land parcels... and that recommendation has been taken onboard and actioned." Despite improvements having been made since the Regulation 18 stage, the SA Report did still flag several sites where there appeared to be the option of expansion (within the submitted site or otherwise) with a view to comprehensive schemes.

- VC PSM1 (Pulham St Mary; 2.83 ha; 50 homes) – “Increasing numbers to match the site area would push the allocation beyond the 50 dwelling mark, making it the largest site in the plan. Its prominence in the landscape would also increase its visual impact.”
- VC SPO2 (Spooner Row; 1.67 ha; 25 homes) – “Estate development could be extended south into the open field; however this would effectively close the gap to the cluster of dwellings at Top Common and the shape/layout of the site is likely to give an uncharacteristically suburban form of development. The inclusion of VC SPO1 [one of the sites ‘taken forward’] takes potential new development in Spooner Row to 60+ dwellings.”
- VC SPO3 (Spooner Row; 0.3 ha; 7 homes) – “Carried forward allocation from the 2015 South Norfolk Local Plan with extant planning permission, further expansion of which is limited by Highways constraints.”
- VC SPO4 (Spooner Row; 0.6 ha; 14 homes) – “Carried forward allocation from the 2015 South Norfolk Local Plan, with extant planning permission. Site mirrors development on the opposite side of Chapel Lane... further extension would encroach into the open countryside. The inclusion of VC SPO1 [one of the sites ‘taken forward’] takes potential new development in Spooner Row to 60+ dwellings.”
- VC STO1 (Stoke Holy Cross; 1.42 ha; 25 homes) – “The site is relatively prominent in the landscape, including within longer distance views, however the current extent is read against the recent developments at... Expanding the site is likely to increase its prominence within the landscape and Stoke Holy Cross has also experienced growth through the 2015 South Norfolk Local Plan and due to a previous lack of 5YHLS... a further significant increase in numbers would be disproportionate to the village size at this time.”

Three settlements are of note because the decision to reject one or more sites (as potential locations for boosting supply) at least partly reflects a view that there is a need to avoid over-allocation at any given village. This is undoubtedly an important consideration, given the stated objectives of the Village Clusters Plan (as established in light of the emerging Greater Norwich Local Plan, GNLP). However, it is also reasonable to consider applying a degree of flexibility. The following bullets consider the three village clusters in turn:

- Little Melton – benefits from very good accessibility to Norwich. This serves as a reason to consider the possibility of higher growth; however, there is a need to balance this against the stated objectives of the Village Clusters Plan, which is to disperse growth. Also, the site in question is subject to historic environment constraint.
- Spooner Row – the SA Report explained: *“Spooner Row stands-out on account of rail connectivity, albeit there is a very limited service, and there is not thought to be any potential for an improved service, in the context of the current plan. The village is also close to the A11, but regular bus services do not pass through the village.”* The report also flagged Spooner Row as: *“... one example of a village where the potential for higher growth to consolidate the built form, and potentially deliver on place-making objectives, might be envisaged. However, this is highly uncertain, as there is a need to give weight to protecting the existing character of the settlement...”*

Attention focuses on SPO02, which is located very close to the train station. However, in practice, were higher growth options to be brought into play, then there could be arguments for significantly boosting the site capacity, such that the approach to growth at the site in question, and for Spooner Row as a whole, would be of a strategic nature (not the aim of the Village Clusters Plan).

- Pulham St Mary – the SA Report (2023) explained that the site in question: *“... is located within walking distance of the primary school (via a footpath / cycleway along the Harleston Road) and, as a larger site, might support some investment in local infrastructure (in this instance, enhanced green space is a focus), to the benefit of the village / villages. Given its location, the effect of development might be to support the joint functioning of the two villages.”* In short, the SA Report suggested it could be appropriate to ‘push at the boundaries’ of the Village Clusters Plan objectives by supporting a single site for more than 50 homes, with a view to securing benefits. However, as discussed, higher growth would increase visual impact, potentially to an unacceptable degree.
- Stoke Holy Cross – as discussed above, and also within the SA Report (2023), the recent experience is one of sub-optimal piecemeal growth, which serves to highlight the importance of supporting comprehensive growth moving forward, including potentially with a view to delivering new infrastructure to redress any issues created by piecemeal growth. However, in practice no infrastructure opportunities are known to exist (given the number of homes reasonably in contention for allocation) and the site is subject to a degree of landscape constraint.

Conclusion

In conclusion, a total of 11 sites / site-specific options were taken forward for appraisal and consultation as options for boosting supply (plus two sites where the option involves expanding the site boundary but no boost to capacity).

This shortlist of sites was selected by officers on the basis of clear reasoning, but the aim of the discussion above is to flag a small number of rejected sites / site-specific options which potentially have a degree of merit, particularly from an accessibility perspective.