

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

SA Report

December 2022

Quality information

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Please note that this is a **draft version** to inform decision-making ahead of consultation. This report is subject to final editing and adjustments, prior to being formally published for consultation.

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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 this SA Report is to present an appraisal of “the plan and reasonable alternatives” in order to inform the current consultation and subsequent plan finalisation. As such:

- Part 1 of this report presents an appraisal of reasonable alternatives; and
- Part 2 presents an appraisal of the current ‘publication’ version of the plan.

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

Section 4 of the report explains a decision to focus attention on the ‘spatial strategy’, and then Section 5 explains a process undertaken over time that led to the identification of reasonable spatial strategy alternatives for appraisal.

It is important to note that a key input to the process was work undertaken at the draft plan stage, including as presented within an Interim SA Report and responses received through the consultation.

The process led to the identification 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 is not possible to define this strategy with precision; however, it is possible to identify village clusters that could potentially see higher or lower growth – see Table A.

Table A: Village cluster assumptions underpinning Option 2

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?

Village cluster	Conclusion on <u>possible</u> alternatives to the emerging preferred approach
Hales etc.	Higher growth (tentative) to deliver a comprehensive scheme and given links to Loddon?
Hempnall etc.	Lower growth as Hempnall nothing 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	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?

Reasonable alternatives appraisal findings

Section 6 presents an appraisal of the two reasonable alternatives.

The appraisal is presented under 12 headings – one for each of the topics that together comprise the SA framework (see Section 3). 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**.¹

Table B presents a summary of the appraisal, and the overall conclusion is as follows:

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).

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). Whilst the conclusion 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 clear benefit of Option 1 is that it will have the effect of supporting the viability of village services and facilities, including primary schools.

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.

It is also important to note that there is 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.

¹ **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.

Table B: 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	=	=

Selecting the preferred option

The following statement explains SNC officers' reasons for supporting **Option 1**:

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 a 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. By far, the largest proportion of growth within Greater Norwich is focused in or adjacent 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) alongside ongoing consideration of the characteristic of individual clusters in conjunction with assessing the merits of available and suitable sites. The appraisal is broadly supportive of the adjustments that have been made to the plan since the draft plan stage, and – in contrast to the appraisal presented in the Interim SA Report (2021) – it is now notable that the assessment has been able to conclude that the preferred option performs broadly on a par with the reasonable alternative in terms of 'accessibility'.

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 detailed site-specific policy, to ensure that sustainability objectives are realised to the fullest extent with potential benefits being maximised and negative effects being 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.

Overview of Part 2

Part 2 of the report presents an appraisal of the current 'publication' version of the plan as a whole.

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'. In practice, the appraisal is an opportunity to elaborate on the appraisal of Option 1 presented as part of the appraisal of reasonable alternatives, particularly with added consideration given to proposed site specific policy.

The appraisal conclusion is as follows:

Whilst the appraisal of reasonable alternatives (Section 6) predicted that the preferred strategy (Option 1) would lead to positive effects on in respect of two sustainability topics, the appraisal of the proposed submission plan as a whole – i.e. the proposed strategy / package of allocations plus site-specific policy – predicts positive effects in respect of eight sustainability topics.

This reflects the fact the plan presents very 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, in turn, development comes forward in a less well coordinated way.

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 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 support enhancements to 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 very strongly supported. A very wide range of key issues 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.
- Recommendations – a focus of the SA process has been on highlighting issues / tensions / draw-backs associated with the emerging preferred approach, in respect of specific sustainability topics, such that they might subsequently be addressed, most notably by making adjustments to the spatial strategy, but also through 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 seek to make good use of existing field boundaries, so as to avoid the artificial sub-visions of fields, and submitted sites (reflecting land ownership boundaries) more generally, and that recommendation has been taken onboard and actioned. There has been limited emphasis on making formal recommendations. At the current time this report presents just one formal recommendation, which relates to ensuring that a consistent approach is taken with regards to the policy requirements for avoiding / mitigating biodiversity impacts at those sites that are in proximity (or relative proximity) to a site designated as being of national or international importance for biodiversity. This recommendation might be actioned prior to consultation, or subsequent to consultation, i.e. as part of the examination.

- 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 predicted effects of the plan are ‘indirect’; specifically, 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.
- 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 local plan 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) – the Village Clusters Plan supports the GNLP spatial strategy, and no issues or tensions have been highlighted.
 - Broad 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. Also, there is a need to support the vitality of villages closely associated with the Broads, 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 strategy 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 on the proposed submission / publication plan has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan 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.

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 Local 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 Local Plan will 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 WRC upgrades completed (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 monitoring framework that is ultimately taken forward.

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.²

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”.³ 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 Report⁴

- 1.3.1 At this current stage of the plan-making process the Council is consulting on the formal draft plan, known as the ‘publication draft’ plan, under Regulation 19 of the Local Planning Regulations.
- 1.3.2 As such, this is the formal SA report. It presents all of the legally required information, with a view to informing the consultation and plan finalisation. It supersedes the previous Interim SA Report (2021).

Structure of this report

- 1.3.3 This report is structured according to the **three questions** above.
- 1.3.4 Before answering the first question, there is a need to further set the scene by introducing:
- the plan scope; and
 - the SA scope.

Commenting on this report

- 1.3.5 This report can be referenced as part of comments on the plan and/or comments can be made specifically on any part of this report. Further guidance is provided below, including within the ‘next steps’ section.

² Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

³ Regulation 12(2) of the SEA Regulations

⁴ See **Appendix I** for a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

2 The plan scope

2.1 Overview

- 2.1.1 The Village Clusters Plan aims to provide for new homes across the more rural parts of South Norfolk. It is being developed alongside the GNLP, which provides important context. The main aim of the Plan 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. Settlement Limits are important because the planning policies which apply within are relatively supportive of new development – subject to the usual planning considerations such as access, amenity, landscaping – in comparison to policies that apply to the wider countryside.
- 2.1.3 As well as the GNLP, important context comes from paragraph 78 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 78 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 68 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 emerging 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 Publication Draft GNLP (2020) assigns 5.5% of the overall GNLP growth to the Village Clusters in South Norfolk.
- 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).⁵ 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.
- 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.

⁵ All bar two of those 2015 Local Plan allocations are proposed to be carried forward into the Village Clusters Plan.

2.3 Existing planning policies

2.3.1 In addition to the emerging GNLP, it is also important to take account of existing planning policy for South Norfolk when preparing the Village Clusters Plan. The key existing documents are:

- The Joint Core Strategy for Broadland, Norwich and South Norfolk (2014), which sets out the strategic planning policies covering the three Districts;
- The South Norfolk Site Specific Allocations and Policies Document (2015), which sets out allocations for housing and other uses; and
- The South Norfolk Development Management Policies Document (2015) which sets out a number of non-site specific policies applicable across many types of development, criteria based policies for various different forms of development and policies applying to particular landscape designations.

2.3.2 When adopted the GNLP will replace the existing Joint Core Strategy (JCS) and will also replace the parts of the South Norfolk Site Specific Allocations and Policies relating to the larger settlements in South Norfolk. The Village Clusters Plan will then replace the remainder of the Site Specific Allocations and Policies document. However, the 2015 Development Management Policies Document will remain extant.

2.4 Neighbourhood Plans

2.4.1 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.

2.4.2 Currently two Neighbourhood Plans - Dickleburgh and Diss and District (which covers Diss, Burston, Roydon and Scole) - are proposing to make their own allocations instead of allocations being made through the Village Clusters Plan. Housing growth targets for these two Neighbourhood Plans have been provided by SNC.

2.5 Plan objectives

2.5.1 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.⁶ 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.

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.

⁶ 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.*’

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.

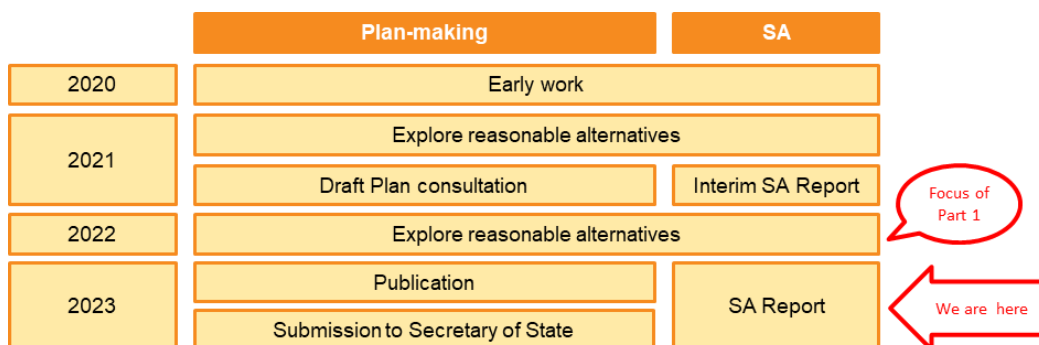
Part 1: What has plan-making / IIA involved up to this stage?

4 Introduction to Part 1

Overview

4.1.1 Plan-making has been underway since 2020, with one formal consultation having been held prior to this current consultation, and one Interim SA Report having been published - see Figure 4.1.

Figure 4.1 Overview of the plan-making / SA process



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** in 2022. Specifically, the aim is to:

- explain the reasons for selecting the alternatives dealt with - see **Section 5**
- present an appraisal of the reasonable alternatives - see **Section 6**
- explain the Council’s reasons for selecting the preferred option - see **Section 7**

4.1.3 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.

What about earlier stages of SA?

4.1.4 A considerable amount of work was completed and published for consultation in the 2021 Interim SA Report, including work to explore reasonable alternatives.

4.1.5 Work completed in 2021 was an input to the process of establishing reasonable alternatives in 2022, as discussed below. However, findings of earlier work stages naturally become out-of-date, such that there is little to be gained from reporting findings in detail. Early work stages are discussed further below.

Reasonable alternatives in relation to what?

4.1.6 The legal requirement is to examine reasonable alternatives (RAs) taking into account the objectives and geographical scope of the plan (see Section 2). Following discussion of plan objectives with officers, it was determined appropriate to focus on the ‘spatial strategy’, i.e. the selection of sites for allocation in order to meet the GNLP housing target and achieve wider plan objectives. Determining a preferred spatial strategy is clearly an overarching objective of the Village Clusters Plan.⁷

What about site options?

4.1.7 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans, because there is no mutually exclusive choice to be made between them. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely if ever the case. Rather, the objective is invariably to allocate a *package* of sites that taken together, as a ‘strategy’, will serve to meet needs and deliver on wider plan-objectives, e.g. around infrastructure delivery. As such, RAs must be in the form of *alternative packages of sites*. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing growth scenarios – see Sections 5.3 and 5.4.

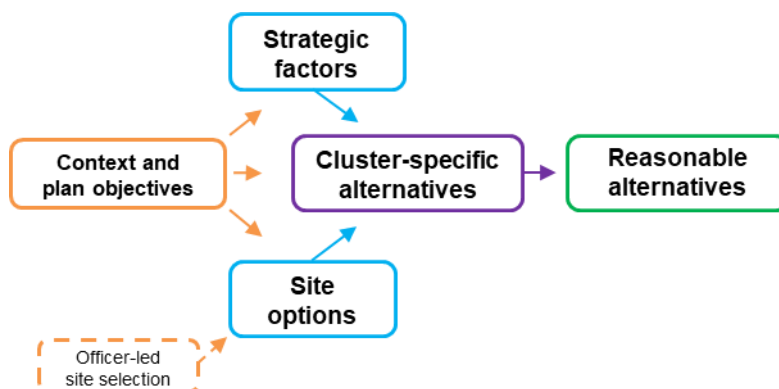
⁷ Furthermore, there is clear potential to define spatial strategy alternatives with differential ‘significant effects’. Planning Practice Guidance explains that SA “*should only focus on what is needed to assess the likely significant effects of the plan*”.

5 Defining reasonable alternatives

5.1 Introduction

5.1.1 The aim here is to discuss the process that led to the definition of reasonable alternatives (RAs).

Figure 5.1: Establishing reasonable growth scenarios



Structure of this section

5.1.2 This section presents the outcomes of a process to arrive at RAs:

- **Section 5.2** – explores strategic factors;
- **Section 5.3** – considers individual site options;
- **Section 5.4** – discusses individual village clusters in turn; and
- **Section 5.5** – draws upon the preceding sections to define RAs.

5.2 Strategic factors

Introduction

- 5.2.1 This is the first of three sections presenting a discussion of inputs to the process of defining reasonable alternatives. This section presents a discussion of strategic ('top down') inputs to the process.
- 5.2.2 In practice, there is a need to report the work undertaken to define, appraise and consult-on 'broad distribution' alternatives in 2021, and to bring that work up-to-date.

Broad distribution alternatives

- 5.2.3 The primary focus of the 2021 ISA Report was an appraisal of the preferred approach to allocation alongside an appraisal of two alternatives, specifically: A) a greater emphasis on focusing growth at more 'accessible' locations; and B) a greater emphasis on 'dispersal'. In summary:
- Option 1 – Striking a balance (the emerging preferred option)
 - Option 2 – Greater emphasis on accessibility
 - Option 3 – Greater emphasis on dispersal
- 5.2.4 The appraisal was 'high level', in that the latter two options were not defined with precision, in terms of the sites that would / would not feature. Also, the appraisal was high-level in that the terms 'accessibility' and 'dispersal' were defined loosely, such that the appraisal would have flexibility to explore:
- accessibility to a higher order settlement (e.g. with a secondary school and GP surgery);
 - accessibility to village services / facilities (primarily a primary school); and
 - dispersal across a larger number of small sites versus a degree of concentration at a smaller number of larger sites, recognising that larger sites can be associated with certain benefits, e.g. in terms of the potential to deliver supporting infrastructure (and generally making good use of the available land).
- 5.2.5 The appraisal concluded:

"From the [appraisal matrix] it is immediately apparent that **Option 1** (striking a balance), which is the emerging preferred approach reflected in the current consultation document, broadly outperforms **Option 3** (dispersal led), with the notable exception of 'Housing', under which there are arguments for dispersing growth to every village cluster to provide for locally arising needs. A general concern with Option 3 is that selecting sites [with the aim of] dispersing growth to all village clusters could lead to pressure to allocate sites that perform poorly in respect of local level of site specific factors, such as landscape and heritage constraint or problematic access.

Moving on to a comparison of **Option 1** (striking a balance) with **Option 2** (accessibility led), it is clear that matters are more finely balanced. Option 1 performs significantly better in respect of Housing, as it would address an established issue in respect of rural housing needs and could involve an increased focus on smaller sites, which are supported by the NPPF (paragraph 68; including as they "*are often built-out relatively quickly*") and the emerging GNLP (paragraph 381; including because smaller sites are suited to SME builders). However, the appraisal concludes that Option 2 is preferable in respect of Accessibility, Climate change mitigation and Transport, as it would involve a focus on those village clusters, and potentially locations within village clusters, where there is the greatest potential to access services and facilities by walking, cycling and public transport, or at least without having to drive long distances, with resultant greenhouse gas emissions, air pollution and traffic. This conclusion is not entirely clear cut, because Option 2 would lead to opportunities missed in respect of supporting village community infrastructure, potentially putting long term viability at risk; however, on balance, it is considered appropriate to conclude in favour of Option 2, in respect of these three closely linked sustainability topics.

The appraisal finds that it is also possible to differentiate Options 1 and 2 in respect of two other topics; however, matters are less significant, and reflect assumptions regarding the locations that would see growth under Option 2. One consideration is that locations that are more accessible / better connected to higher order centres often tend to be associated with transport corridors that follow river valleys..."

- 5.2.6 The appraisal served to inform and support the Regulation 18 consultation and was available for comment as part of that process. Notably, Norwich City Council responded with a suggestion that, in light of the appraisal, the preferred strategy might be adjusted to achieve a greater focus on more accessible locations (which in practice could well mean a greater focus on locations in proximity to Norwich). This is an important consideration; however, there remain clear arguments in support of dispersing growth more widely, indeed this is a core objective of the plan, developed in light of the emerging of Greater Norwich Local Plan (GNLP), which commends the village clusters approach as ‘innovative’, and which states:

“... this level of growth in village clusters aims to promote social sustainability by supporting rural life and services... [and] has the benefit of supporting small-scale builders, providing choice for the market and helping to ensure the delivery of housing in popular village locations.”

Conclusion on strategic factors

- 5.2.7 At the current time, the view is that the primary strategic choice is between:
- the emerging preferred approach, which is an evolution of the strategy previously published for consultation in 2021, and which seeks to strike a balance between ‘accessibility’ and ‘dispersal’; and
 - an alternative strategy with a modestly greater emphasis on accessibility.
- 5.2.8 With regards to the option of a spatial strategy with a greater emphasis on ‘dispersal’, as previously appraised and presented for consultation in 2021, this can now be ruled-out as unreasonable, such that it need not be a focus of appraisal and consultation at the current time. The option of dispersal was found to have limited merit through the appraisal in 2021, and limited support through the consultation.
- 5.2.9 It is recognised that confidence increases, regarding a more dispersed strategy, in respect of the national switch-over to electric vehicles (EVs) over time. Also, it is recognised that concern regarding maintaining the viability of village services and facilities (notably primary schools), and maintaining village vitality more generally, potentially increases over time. However, on balance, at this stage in the plan-making process, it is considered reasonable and appropriate to move away from consideration of a strategy that is heavily focused on dispersing growth as widely as possible across the 48 village clusters.

A note on nutrient neutrality

- 5.2.10 Nutrient neutrality emerged as a key issue in 2022, following publication of a Written Ministerial Statement on Nutrient Levels in River Basin Catchments. Inspectors examining the GNLP wrote to the combined authorities preparing the plan (‘the Partnership’) in April 2022, requesting a view on implications for the GNLP, and the Partnership responded stating:
- “The Partnership expects the policy amendments to tie the delivery of housing growth more tightly to nutrient levels impacting on internationally protected habitats, including as appropriate, a county-wide mitigation strategy. The availability of a mitigation strategy will affect the timing of the delivery of sites as opposed to the principle of their development.”*
- 5.2.11 The “internationally protected habitats” in question are the River Wensum and the Broads Special Areas of Conservation (SACs). The catchments within which water pollution (i.e. nutrient enrichment) could impact on these two SACs is very extensive, covering much of the plan area. The affected catchments are mapped within a [statement](#) submitted by the Partnership to the GNLP Examination in April 2022.
- 5.2.12 The development of a “county-wide mitigation strategy” is now progressing, and the Partnership published an updated ‘housing trajectory’ (setting out the timing of the delivery of sites) in October 2022 (see www.gnlp.org.uk/local-plan-examination-local-plan-examination/latest-news).
- 5.2.13 For the Village Clusters Plan, it is similarly the case that nutrient neutrality is an issue with a bearing on the timing of developments, as opposed to site selection. There are parts of South Norfolk that are not constrained by nutrient neutrality, because they are associated with a less sensitive water catchment (specifically, they do not drain to either the River Wensum or the Broads SACs). However, Natural England has not recommended, to date, that growth should be directed to these areas, or even weighted towards these areas, given the potential for nutrient neutrality to be addressed via careful consideration of the timing of development in combination with an agreed county-wide mitigation strategy.
- 5.2.14 As such, the matter of nutrient neutrality is not considered to be a strategic factor with a significant bearing on the development of reasonable alternatives.

5.3 Site options

Introduction

- 5.3.1 This is the second of three sections presenting a discussion of inputs to the process of defining reasonable alternatives. This section presents a discussion of site options, as a 'bottom up' input to the process.
- 5.3.2 A number of work-streams have explored site options, over the course of the plan-making SA process. The discussion below is in broad chronological order.

Identifying site options

- 5.3.3 The process of identifying site options was led by the Council, with the consultation document explaining:
- “Council has only assessed sites which have been put forward to us for consideration by (or on behalf of) the landowner or the potential developer of the site. The primary reason for this is to ensure that there is a reasonable prospect that the sites which are eventually allocated will come forward within the lifetime of the Plan. Many of the sites were initially put forward as part of the GNLP process, which meant they were considerably larger than what is being sought in the Village Clusters Plan. However, in March 2020 the Council sought to contact all of the site promoters to ask them whether they wished to amend their sites to take into account the requirements of the Village Clusters Plan i.e. for smaller sites which reflect the smaller, rural communities that they will be a part of, and which will contribute to the smaller sites requirement in the NPPF. A further 'call for sites' was included in the GNLP Regulation 18 consultation between January and March 2020, and again during the Regulation 18 consultation for the Village Clusters Plan during summer 2021. In total over 500 sites were assessed during this process.”
- 5.3.4 In summary, available site options were carried forward from the GNLP in early 2020, and confirmed for consideration in the VCHAP. The list was then refined and supplemented through the 2021 Regulation 18 consultation. Figure 5.2 shows the 500+ available site options.

Shortlisting site options

- 5.3.5 Throughout the plan-making / SA process, up to the point of finalising the current publication version of the plan, there has been a focus on identifying not only emerging preferred site options, but also 'shortlisted' site options, i.e. sites not proposed for allocation, but in close contention.
- 5.3.6 Shortlisted site options are not highlighted in Figure 5.2 (nor are emerging proposed allocations highlighted), but shortlisted site options are discussed extensively in the sections below.

Figure 5.2: All available site options

[Map of all site options is in preparation]

GIS analysis

- 5.3.7 The analysis involves examining the spatial relationship (i.e. proximity / percentage intersect) between site options and a range of constraint (or “push”, e.g. flood zones) and opportunity (or “pull”, e.g. GP surgeries) features for which data is available in digitally mapped form across the district as a whole.
- 5.3.8 The outcomes were made available to the Council in late 2020 as part of the process of site assessment by officers and of selecting preferred sites for consultation, and then reported within the Interim SA report 2021. Findings were reported in a table with sites grouped by village cluster, and with emerging preferred allocations and shortlisted sites highlighted. Updated analysis is presented in Appendix III.
- 5.3.9 It is important to state that the analysis has *inherent limitations* on the basis that proximity / percentage intersect is often a crude indicator of constraint or opportunity. For example, whilst percentage intersect with a flood risk zone is a strong indicator of actual constraint, proximity to a designated biodiversity feature is less robust as an indicator of constraint (e.g. because there is a need to consider whether the SSSI is accessible, or whether there is hydrological connectivity between the site and SSSI). Also, distance / intersect analysis is undertaken blind to the potential to avoid and mitigate impacts, for example by leaving parts of a site undeveloped, e.g. the part of the site that is subject to flood risk.
- 5.3.10 The limitations are such that there is little or no potential to reach conclusions on ‘significant effects’, hence the exercise is not technically ‘appraisal’. However, it is a useful input to the process of defining RAs.

Early appraisal notes

- 5.3.11 AECOM prepared a series of five SA ‘notes’ over the period late-2021 to early 2022, with each of the notes presented to a meeting of elected members. Each of the notes dealt with around ten village clusters, and the primary aim was to present a commentary on the merits of the emerging shortlisted sites (under the SA framework, see Section 3), in order to inform selection of preferred allocations for consultation, although the opportunity was also taken to comment on select ‘rejected’ sites, particularly where it was identified that they might perform relatively well in terms of one or more elements of the SA framework.
- 5.3.12 The five notes were included as Appendix III of the Interim SA Report (2021). The main body of the Interim SA Report also presented the following summary findings:
- Limited potential for significant effects – a conclusion of all five Notes was that the majority of shortlisted sites have no notable sensitivity in relation to the majority of SA themes and development would be unlikely to result in significant effects.
 - Accessibility – the majority of shortlisted sites perform well, or reasonably well, in terms of “access to local services and facilities within village clusters, particularly in relation to supporting walking access to at least a primary school.” The majority do not have convenient links to higher-tier services at larger settlements by ‘sustainable’ modes, although sites at Scole (linked to Diss), Brooke (linked to Poringland) and Spooner Row (linked to Attleborough and Wymondham) perform relatively well.
 - Constrained shortlisted sites – the appraisal raised notable concerns with: sites at Ditchingham (biodiversity, historic environment, landscape); the site at Tasburgh (historic environment, landscape and transport); site SN4048SL at Hapton (biodiversity, accessibility and transport); site SN1015 at Hempnall (historic environment and flood risk); sites SN4015 and SN4017 at Burgh St Peter (accessibility, economy and transport); site SN0414 at Haddiscoe (setting of the Broads National Park and loss of agricultural land, although in practice development would be supported on only a proportion of the site); and the site at Geldeston (proximity to, and upstream of, the Broads).
 - Gillingham – the fifth SA Note reached a notable conclusion in respect of the three shortlisted sites at Gillingham: “Under many socio-economic SA themes, the sites perform strongly, as they support very good accessibility via sustainable travel modes to local facilities within the village and to higher tier services, employment and transport options at nearby Beccles. However, the sites appear significantly constrained in relation to the environmental SA themes...” These related to proximity to the Broads and also flood risk, which is being addressed by a separate Stage 2 Strategic Flood Risk Assessment.
 - Rejected sites – each of the five SA Notes reached a conclusion that, in general, the shortlisted sites perform well in relation to the rejected sites. However, the appraisal commentaries did highlight a number of instances of rejected sites performing relatively well in one or more respects.

May 2022 appraisal note

- 5.3.13 As discussed above, the appraisal of broad distribution alternatives within the 2021 Interim SA Report provided a forum for exploring the merits of individual site options, both preferred and shortlisted.
- 5.3.14 Following the assessment of new and amended sites submitted during the Regulation 18 consultation and the reassessment of some previously preferred/shortlisted sites as result of the consultation responses and emerging evidence (such as the Stage 2 SFRA and Heritage Impact Assessments), in May 2022 AECOM prepared a further SA Note for elected members. The aim was to present a commentary on emerging proposed changes, both to preferred allocations and shortlisted sites. The limitations of this are recognised, i.e. the note did not present commentary on sites with an unchanged status, relative to the draft plan consultation stage. The note is presented within Appendix IV, with its conclusion as follows:

“[Primary findings are in respect of] effects under the accessibility, historic environment and landscape headings. Also, there are number of points to note in respect of biodiversity, climate change adaptation (flood risk) and housing. With regards to the lengthy discussion presented under ‘accessibility’, it is important to note crossovers with sustainability objectives relating to climate change mitigation (decarbonisation) and communities.

One of the key net effects of the proposed changes in combination appears to be an increased emphasis on sites with greater accessibility, whether to local facilities (primarily the local primary school), or higher order facilities (e.g. a secondary school) at a nearby larger village or town.

Also, there appears to be an added focus on larger sites, where economies of scale can support a good housing mix, including affordable housing, and potentially wider planning gain, e.g. land being given over non-housing uses and/or investment in offsite infrastructure (also, sites that make use of existing field boundaries are supported).

However, neither of these ‘net effects’ have been quantified and, in both respects (accessible locations and larger sites), it would appear that the change in approach is modest. This is appropriate, recalling the objective of the Village Clusters Plan, which is to disperse growth widely across the VCs.”

Detailed workstreams led by SNC

- 5.3.15 A range of SNC-led workstreams examining site options have run in parallel to the SA process.
- 5.3.16 The starting point was the Norfolk-wide Housing and Economic Land Availability Assessment (HELAA) Methodology (2016). From this starting point, further detailed workstreams included looking at the planning history of each site, undertaking site visits and applying detailed site-selection criteria. With regards to site selection criteria, one key matter was in respect of distance to services and facilities, given the focus of the plan on providing housing to meet the needs of a predominantly very rural area.
- 5.3.17 Site Assessments were prepared in 2020/2021, informed by a Technical Consultation to gain the views of specialists in respect of issues including flood risk, ecology, landscape, heritage, highways and utilities. In some instances, such as with Norfolk County Highways, the Lead Local Flood Authority and Norfolk County Children’s Services, this was then followed up with meetings to better understand the Technical Consultation inputs. Clearly, the draft plan consultation then also provided an opportunity for specialists and stakeholder organisations to comment further in detail; and further targeted discussions were held with specialists / stakeholder organisations subsequent to the consultation, as well as an additional Technical Consultation on those new and amended sites submitted during the consultation.
- 5.3.18 A number of evidence base studies have been prepared, notably:
- Heritage Impact Assessments – were prepared for select sites following comments received from Historic England during the draft plan consultation;
 - Landscape and Visual Appraisal – have been completed for all preferred sites;
 - Stage 2 Strategic Flood Risk Assessment – including an update undertaken in Autumn 2022;
 - Viability Appraisal – developed from the 2020 Appraisal undertaken for the GNLP and considered a three bespoke site typologies, taking into account changes over the subsequent two years (N.B. development viability is relevant to the nutrient neutrality mitigation strategy);
 - Water Cycle Study – an important source of evidence given the issue of nutrient neutrality.

5.4 Village cluster alternatives

Introduction

- 5.4.1 This is the third of three sections presenting a discussion of inputs to the process of defining reasonable alternatives. This section presents a discussion of select village clusters in turn.
- 5.4.2 The aim of this section is to identify a selection of village clusters 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 (see Section 5.2).
- 5.4.3 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.
- 5.4.4 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 to take, in light of the process discussed above, across Sections 5.2 and 5.3, and broadly in line with the principle of ensuring proportionality, as part of the process to define reasonable alternatives.⁸

Alpington, Yelverton and Bergh Apton

- 5.4.5 The two proposed allocations are unchanged from the draft plan stage. However, one of the proposed allocations 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.

Aslacton, Great Moulton & Tibenham

- 5.4.6 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 & Wrampingham

- 5.4.7 Whilst the draft plan did not propose any allocations, the proposal is now 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.
- 5.4.8 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.

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 Hetherset; 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."*

- 5.4.9 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).

Barnham Broom (and others)

- 5.4.10 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.
- 5.4.11 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.
- 5.4.12 Whilst higher growth is feasibly an option, 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 (discussed above) – supporting an improved bus service might be envisaged, but there is likely not a realistic possibility in the context of the Village Clusters Plan.

Bawburgh

- 5.4.13 The proposed allocation for 35 homes is unchanged from the draft plan stage, 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. 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 are potentially a constraint.

Bressingham

- 5.4.14 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.
- 5.4.15 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

- 5.4.16 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.
- 5.4.17 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

- 5.4.18 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.

- 5.4.19 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

- 5.4.20 The proposed allocation for 35 homes is unchanged from the draft plan stage, but the proposed settlement extension has been further extended. There is a notable shortlisted site 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.
- 5.4.21 Also, there is the option of extending the proposed allocation, which - as currently proposed - would involve allocating part of a field (indeed, the central part of the field, as the allocation would extend a committed site). Allocating the remaining part of the field could deliver at least another 30 homes, so the risk would be that too many homes are directed to Ditchingham / Broome, albeit the village benefits from very good connectivity to Bungay, and a primary school is near adjacent. Another issue is an identified need for offsite junction improvements in the area, although it might be that higher growth assists in this respect.

Earsham

- 5.4.22 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. The new proposal is 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.
- 5.4.23 The change of strategy is 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
- 5.4.24 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.

Gillingham, Geldeston, Stockton

- 5.4.25 The two proposed allocations, for a total of 55 homes, are unchanged from the draft plan stage.
- 5.4.26 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 with convenience store on the A143 / A146 junction (on the main Norwich/Beccles bus route), plus new coffee shop and restaurant, which have provided a new direct walking / cycling link to Gillingham village.

Hales, Heckingham (and others)

- 5.4.27 The proposal is 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.
- 5.4.28 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)

- 5.4.29 The proposal is 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

- 5.4.30 The draft plan proposed three allocations for a total of 49 homes, but one of those allocations is now rejected due to flood risk and lack of active promotion. The latest proposal is also 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.
- 5.4.31 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

- 5.4.32 The proposal is now 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 at the draft plan stage. 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 it is also noted that the recent Hethersett northern strategic urban extension is nearby to the south (but there are no footpath connectivity).
- 5.4.33 Despite the proposal to support 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, although the presence of a grade 2 listed barn within the site is a clear constraint.
- 5.4.34 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 to housing growth, with a view to ensuring new housing delivered alongside commensurate investment in infrastructure.

Mulbarton, Bracon Ash, Swardeston & East Carleton

- 5.4.35 The proposal is broadly unchanged, with the proposal being to support five fewer homes across the two allocations, in comparison to the draft plan stage. The larger of the two allocations is at Mulbarton.
- 5.4.36 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.
- 5.4.37 The proposed allocation at Swardeston is adjacent to committed sites to the north and south, such that there is a need to caution over piecemeal growth. However, the remaining land would allow for the removal of a number of former plant nursery buildings which are no longer in use. It is important to note that the committed site to the north (30 homes) is an existing allocation without planning permission, hence there is a need to consider the possibility of reviewing the broad strategy for this area, east of Swardeston, noting that another adjacent site is under construction, and another delivered in the past ~10 years. This is an example of piecemeal housing growth that could potentially lead to opportunities missed; however both the new allocation and the carried forward site policy will seek to highlight the opportunities.
- 5.4.38 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 context of the Village Clusters Plan) in the second half of 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.

- 5.4.39 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

- 5.4.40 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 new site for 12 homes at Wortwell.
- 5.4.41 The new proposed allocation will 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.
- 5.4.42 However, the new proposed 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). 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

- 5.4.43 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.
- 5.4.44 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

- 5.4.45 The draft plan proposed two allocations for 70 homes, but the proposal now is to delete one of the allocations which was withdrawn by the promoter (20 homes), leaving a single allocation for 50 homes.
- 5.4.46 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.
- 5.4.47 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

- 5.4.48 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.
- 5.4.49 The proposed strategy of two allocations for a total of 50 homes is unchanged from the draft plan stage. However, neither site performs 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. One of the sites 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. The other site is better located from an accessibility perspective, but associated with higher ground, hence views from footpaths to the south are a consideration, although is well contained on three sides.

Seething & Mundham

- 5.4.50 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.
- 5.4.51 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. 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

- 5.4.52 The proposed strategy of two allocations for a total of 40 homes is unchanged from the draft plan stage. 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.
- 5.4.53 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 larger of the two proposed allocations, 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)

- 5.4.54 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, Fornsett End

- 5.4.55 The proposed strategy of one allocation at Tacolneston for a total of 20 homes is unchanged from the draft plan stage. 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

- 5.4.56 The proposed strategy is broadly unchanged, with the new proposal to support 25 homes at the proposed allocation, instead of 30 homes. The proposed allocation will provide land for a primary school expansion.
- 5.4.57 Tasburgh is well-connected, with a regular bus service along the A140 to Norwich and Long Stratton, and 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.

Tharston, Hapton, Flordon

- 5.4.58 Whilst the draft plan proposed a 12 home allocation at Hapton, which is a notably small village supporting a primary school, the current proposal is not to allocate this site.
- 5.4.59 This change of tack is potentially supported from an accessibility perspective (and reflects the Interim SA findings, including in respect of biodiversity constraint), as Hapton is a notably rural village. 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 whether there might be implications for the long-term viability of the village primary school.

Thurlton & Norton Subcourse

- 5.4.60 The proposal is now 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.
- 5.4.61 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.
- 5.4.62 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 new 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. As such that there is a need to question whether there is a risk of sub-optimal piecemeal growth over time.

Tivetshall St Mary and Tivetshall St Margaret

- 5.4.63 The proposed strategy is broadly unchanged, 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.
- 5.4.64 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.
- 5.4.65 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)

- 5.4.66 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.
- 5.4.67 The proposed strategy has changed slightly from 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.
- 5.4.68 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.
- 5.4.69 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

- 5.4.70 The proposed strategy of two allocations for a total of 42 homes is unchanged from the draft plan stage. 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 42 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 (discussed above).

Winfarthing & Shelfanger

- 5.4.71 The broad strategy is unchanged, 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

- 5.4.72 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.
- 5.4.73 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

- 5.4.74 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.
- 5.4.75 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.
- 5.4.76 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

- 5.4.77 The discussion above has sought to identify village clusters where there could be an argument for higher or lower growth, relative to the emerging preferred approach, from an accessibility perspective. However, it is important to be clear that there are limitations to this exercise.
- 5.4.78 Firstly, 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).

5.4.79 Secondly, 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 (including the local primary school) and also considerations around the need to maintain the long term viability of local services and facilities.

5.4.80 Having made these introductory points, the table below presents conclusions on those village clusters where there is considered to be an argument for departing from the emerging preferred approach with a view to ensuring a greater focus on the achievement of accessibility objectives.

Table 5.1: Conclusions on village cluster alternatives

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 nothing 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	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?

5.5 The reasonable alternatives

Introduction

5.5.1 Having gone through a process (see Figure 5.1) involving consideration of strategic factors (Section 5.2), site options (Section 5.3) and village cluster-specific alternatives (Section 5.4), the final task is to draw together the understanding generated in order to arrive at a single set of reasonable alternatives for the Village Clusters Local Plan. To recap (Section 4), reasonable alternatives are defined as:

alternative approaches to the allocation of land for housing, where each of the alternatives is 'reasonable' in that it would deliver the requisite number of homes and more broadly align with the plan objectives.

Combining village cluster options

5.5.2 In practice, the task is to combine village cluster options. Specifically, there is a need to combine: A) supply from those village clusters discussed in Section 5.4 as being associated with just one reasonable growth option (for the purposes of testing through SA); and B) either lower or higher growth from those village clusters where the discussion in Section 5.4 identifies a possible choice between alternatives.

5.5.3 There is a very large number of combinations that are feasibly reasonable, hence there is a need to take a pragmatic approach, and with a view to ensuring accessibility. It is important to be clear that *"the phrase all reasonable alternatives does not equate to all conceivable alternatives,"*⁹ and there is clear precedent on the need for proportionality, in respect of defining reasonable alternatives.

5.5.4 On balance, it is considered reasonable and appropriate to simply define the following two alternatives:

- Option 1 – the emerging preferred approach; and
- Option 2 – an alternative with a greater emphasis on accessibility, as understood from Table 5.1.

⁹ See <https://www.aylesburyvaldc.gov.uk/sites/default/files/VALP/VALP%20Report.pdf#page=43>

6 Alternatives appraisal

6.1 Introduction

6.1.1 The aim of this section is to present an appraisal of the two reasonable alternatives introduced above.

Appraisal methodology

6.1.2 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.¹⁰

6.1.3 Further points to note on methodology are as follows:

- Constant 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. 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.

6.2 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.

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

6.2.1 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
- dispersal across a larger number of small sites versus a degree of concentration at a smaller number of larger sites, recognising that larger sites can be associated with certain benefits, e.g. in terms of the potential to deliver supporting infrastructure (and generally making good use of the available land).

6.2.2 There is also a need to consider the context of the plan-making process over time, as discussed in Sections 4 and 5. In particular, as discussed at paragraph 5.3.15, 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. 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 5.1, where there is perhaps a bias towards supporting better connected village clusters – might have significant negative implications for the "accessibility to village services / facilities" dimension of accessibility, as introduced above.

¹⁰ 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.

- 6.2.3 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.
- 6.2.4 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). 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 Hetherset, Wymondham and Trowse.
- 6.2.5 Having said this, the discussion in Section 5.4 highlights a wide range of potential 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 'sustainable transport' connectivity – 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.
 - 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 Section 5.4.
 - Sites well located in terms of the ability to easily walk to local services and facilities – for example, the discussion presented in Section 5.4 serves to highlight the possibility of nil growth at Bergh Apton (leaving one allocation for 25 homes within the village cluster) and higher growth at Bressingham.
 - More comprehensive growth to secure new / upgraded community infrastructure – mindful of numerous instances of piecemeal recent and committed village expansion, as highlighted in Section 5.4, 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.
- 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, with open spaces between groups of dwellings.
- 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.
- 6.2.6 In **conclusion**, whilst the equivalent appraisal of reasonable alternatives presented within the Interim SA Report (2021) 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 an certainty. 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 plan-making process.
- 6.2.7 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.

6.3 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

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

6.3.1 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. Key potentially variable growth locations are:

- A146 corridor – connects the east of Norwich to Loddon and Beccles. Between 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 there is 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). 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 Section 5.4 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.

6.3.2 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. 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 5.1 as a potential variable (namely Thaston / Flordon / Hapton, Wrenningham / Ahswellthorpe, 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.

6.3.3 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*”.

6.3.4 Firstly, there is the possibility of concentrating growth along river corridors, which in variably 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.

- 6.3.5 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 (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) can lead to a risk of piecemeal expansion of the site in the future, leading to opportunities missed to secure new greenspace / biodiversity enhancements.
- 6.3.6 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 the Village Clusters Plan.
- 6.3.7 With regards to significant effects, broadly **neutral effects** are predicted, given the limited number of homes involved / limited potential to support concentrations of growth.

6.4 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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- 6.4.1 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 2 Strategic Flood Risk Assessment (SFRA, 2022).
- 6.4.2 The emerging preferred 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).
- 6.4.3 It is on this basis that it is difficult to view the shortlisted site at Gillingham as a reasonable contender for allocation, despite Gillingham having strong accessibility credentials. 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 the nearby recent service station on the A143 / A146 junction.
- 6.4.4 In respect of surface water flood risk, two sites are of note:
 - Hales – is well-connected to Loddon and other higher order settlements via a good bus service, such that the possibility of an increased focus of growth here alongside a reduced focus of growth at nearby village clusters that are less-well connected and/or closely associated with the Broads can be suggested. The latest proposal 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 the nationally available dataset suggests only a 1 in 1000 year risk). It is also noted that an adjacent scheme for 23 homes is the subject of a current planning application. 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. However, it is not clear whether the possibility of a joint scheme would increase were there to be support for additional homes.

- 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.

6.4.5 With regards to proposed allocations under Option 1 that might feasibly be deleted, or assigned a reduce number of homes, under Option 2, the proposed allocation for 12 homes at Wortwell (which is a new proposed allocation since 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).

6.4.6 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.

6.5 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.

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

6.5.1 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’).

6.5.2 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.

6.5.3 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.

6.5.4 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.

6.5.5 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 the 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).

6.5.6 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).

6.5.7 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 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.

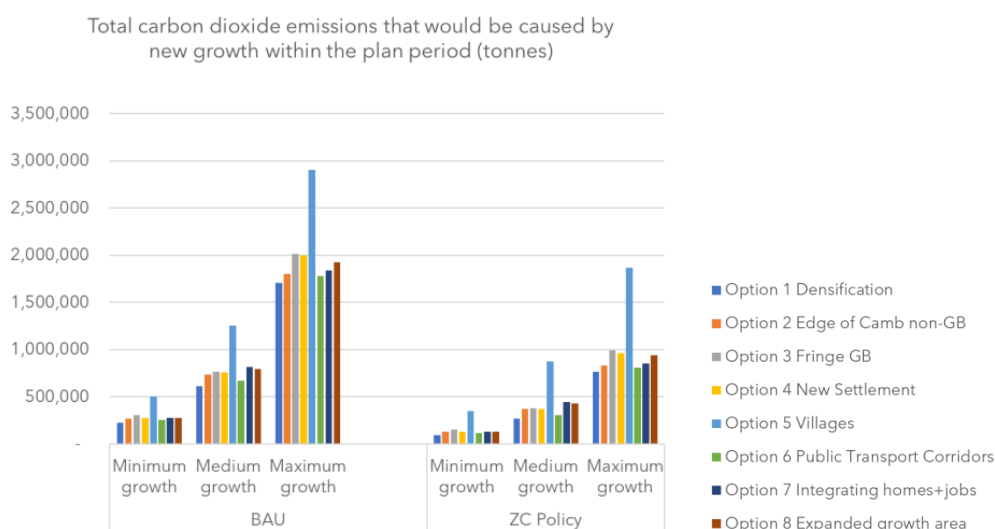
6.5.8 With regards to the significance of effects, as per the conclusion at the draft plan stage, it is considered appropriate to flag **moderate or uncertain negative effects** on the baseline. This is despite:

- 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.

6.5.9 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 (78% reduction by 2035, against a 1990 baseline). 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):

*“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.



6.6 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.

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

6.6.1 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.

6.6.2 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, 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 – in this respect 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 (paragraphs 6.3.3 to 6.3.5); 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 Section 5.4, 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 Burgh 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 Section 5.4 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. The draft plan explained:

“The site is located to the south of School Lane where there are reasonable verges but no footways; the road would need to be widened and include footpaths. It would also need to be demonstrated that sufficient visibility splays can be achieved, prior to accepting development is acceptable.” In contrast, the sole proposed allocation under Option 1 (35 homes) relates very well to the village core, with the primary school adjacent.

- 6.6.3 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.
- 6.6.4 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.

6.7 Economy

Objective: 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.

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

- 6.7.1 There is inherently very limited potential to draw strong conclusions under this topic heading, given that:
 - none of the sites in contention for allocation (noting that strategic site options fall outside the scope of the Village Clusters Plan) would deliver new employment land; 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 argument for suggesting that growth in proximity to employment / employment growth areas will be supportive of economy/employment objectives.
- 6.7.2 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; 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.
- 6.7.3 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.
- 6.7.4 In **conclusion**, it is not possible to differentiate between the alternatives with any confidence.

6.8 Historic environment

Objective: Protect, conserve and enhance designated and non-designated 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.

Option 1 The emerging preferred approach	Option 2 Increased emphasis on accessibility
	<p>2</p>

- 6.8.1 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. 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, and also for sites subsequently preferred post-Regulation 18.
- 6.8.2 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).
- 6.8.3 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.
- 6.8.4 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.
- 6.8.5 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.
- 6.8.6 The following are notable locations that might see higher growth under Option 2:
- Barford – the site discussed (in Section 5.4) 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.
 - Bawburgh – is constrained on account of an extensive conservation area, characteristically located on both sides of the River Yare. However, the site discussed (in Section 5.4) as possibly in contention for additional allocation is quite peripheral to the village core.
 - Bressingham - the site discussed (in Section 5.4) 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 Section 5.4) 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.
- 6.8.7 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 could involve 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.

6.8.8 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.

6.9 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.

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

- 6.9.1 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 emerging 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*”. Both of the reasonable alternatives 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); although there may be marginally more risk if development were concentrated in fewer larger sites.
- 6.9.2 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.
- 6.9.3 There is a need to consider the recent context of the Covid-19 pandemic, which could well lead to increased demand for housing in rural areas, given an increased prevalence of home working and a desire for spacious properties, generous gardens and good access to open space and countryside.
- 6.9.4 Another consideration is supporting a good housing mix within development sites, including the full quota of affordable housing. The emerging GNLP requires all major development proposals (currently defined in the NPPF as for ten or more dwellings) to provide at least 33% on-site affordable housing and a mixture of housing sizes, types and tenures. 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. This serves as an argument in support of Option 2.
- 6.9.5 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; the average size of allocation in the Regulation 19 version of the plan is just below 25 dwellings.
- 6.9.6 With regards to effect significance, it is judged appropriate to predict **moderate or uncertain effects** only for Option 1. The GNLP (2021) 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, hence there is a strong argument for ‘seeing through’ this task, and minimising compromises, from a ‘Housing’ perspective.

6.10 Land and soils

Objective: Ensure the efficient and effective use of land and maintain the integrity of mineral extraction sites and safeguarding areas in the District.

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

- 6.10.1 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.
- 6.10.2 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.
- 6.10.3 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. Converseley, 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 5.1 as one of the villages that are potentially a ‘variable’ across the alternatives.
- 6.10.4 A related consideration is reducing the size of agricultural fields such that they become uneconomical, in terms of continued agricultural production. However, it is not clear that this is a significant issue.
- 6.10.5 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. A further part-brownfield site has been added at Barford (a relatively well connected settlement) post-Regulation 19.
- 6.10.6 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 Section 5.4 comprise brownfield land).
- 6.10.7 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 is in preparation). However, it is also important to note that safeguarding is not absolute, as explained by the Minerals Safeguarding Practice Guidance (Mineral Products Association, 2019): *“Allocation of sites for non-minerals development within MSAs and proximate to safeguarded minerals infrastructure sites should be avoided where possible... However, safeguarding is not absolute. Where other considerations indicate that a proposed site allocation within an MSA is appropriate... [employ] mitigation measures to reduce the... amount of resource sterilised.”*
- 6.10.8 In **conclusion**, it is not possible to differentiate the alternatives with any confidence.
- 6.10.9 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.¹¹ 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.

¹¹ Natural England guidance ([gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land](https://www.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.

6.11 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 Broadland National Park.

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

- 6.11.1 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.
- 6.11.2 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.
- 6.11.3 However, landscape issues in respect of those proposed allocations under Option 1 that are 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.
- 6.11.4 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.
- 6.11.5 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. Gillingham is potentially notable, in that it appears there could be the potential for additional homes to be delivered at the proposed allocation, but the site is constrained on account of the nearby national park boundary. These sites will also be within a wider ‘River Valley’ designation under the local plan.
- 6.11.6 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 the wider gateways into the city. 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.
- 6.11.7 Amongst other things, there would be a risk of 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*”.
- 6.11.8 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.

- 6.11.9 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, explains that development proposals must demonstrate how they protect “*the distinctive characteristics, special qualities and geographical extents*” of the three river valleys. 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 Section 5.4.
- 6.11.10 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.
- 6.11.11 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.
- 6.11.12 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 the case that landscape sensitivities have been a primary 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.

6.12 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.

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

- 6.12.1 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.
- 6.12.2 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. 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.
- 6.12.3 In **conclusion**, there is support for Option 2, as per the conclusion at the draft plan consultation 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.
- 6.12.4 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.

6.13 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.

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

- 6.13.1 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. A key focus of the 2022 WCS 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.
- 6.13.2 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.
- 6.13.3 Following a screening process, the study focuses attention on the following WRCs: Barnham Broom; Ditchingham; Forncett / Forncett End (serves Bunwell as well as Tascolneston / Forncett End); Long Stratton (serves Aslacton, Great Moulton and Tibenham); Whittingham Trowse (serves Little Melton and Bawburgh and Rockland St. Mary); and Woodton.
- 6.13.4 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.
- 6.13.5 Focusing on the Whittingham Trowse WRC (which is the main WRC serving Norwich), the WCS concludes as follows:
 - 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.
- 6.13.6 Similarly, for the other WRCs in question, the WCS finds that additional growth through the Village Clusters Plan can be accommodated, following investment in upgrades. 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.
- 6.13.7 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. There could be 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.
- 6.13.8 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, there is confidence in the ability to bring forward a County-wide nutrient neutrality mitigation strategy (as discussed in Section 5.2). As such, **neutral effects** are predicted.

6.14 Appraisal conclusion

- 6.14.1 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).
- 6.14.2 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). Whilst the conclusion 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 clear benefit of Option 1 is that it will have the effect of supporting the viability of village services and facilities, including primary schools.
- 6.14.3 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.
- 6.14.4 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	=	=

7 The preferred approach

7.1 Introduction

- 7.1.1 As discussed, it is not the role of the appraisal to arrive at a conclusion on which of the alternatives is best, or 'most sustainable' overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal. This section presents the response of SNC to the appraisal.

7.2 Selecting the preferred scenario

- 7.2.1 The following statement explains SNC officers' reasons for supporting **Option 1**. It is important to be clear that the statement below is not an 'appraisal' in the SA sense.

Statement provided by officers

- 7.2.2 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 a 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.
- 7.2.3 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. By far, the largest proportion of growth within Greater Norwich is focused in or adjacent 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.
- 7.2.4 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) alongside ongoing consideration of the characteristic of individual clusters in conjunction with assessing the merits of available and suitable sites. The appraisal is broadly supportive of the adjustments that have been made to the plan since the draft plan stage, and – in contrast to the appraisal presented in the Interim SA Report (2021) – it is now notable that the assessment has been able to conclude that the preferred option performs broadly on a par with the reasonable alternative in terms of 'accessibility'.
- 7.2.5 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.
- 7.2.6 This serves to highlight the importance of setting detailed site-specific policy, to ensure that sustainability objectives are realised to the fullest extent with potential benefits being maximised and negative effects being 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.

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 proposed submission Village Clusters Plan, as a whole.
- 8.1.2 In practice, the appraisal builds upon the appraisal of Option 1 presented in Section 6. Specifically, the appraisal revisits the appraisal of Option 1 with added consideration given to:
- site allocations that are a ‘constant’ across the growth scenarios appraised in Section 6 (i.e. allocations at village clusters not listed in Table 5.1 as being potentially associated with a strategic choice); and
 - site-specific policies.

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 55 proposed allocations and, in each case, the plan presents site specific policy as well as supporting text explaining the range of issues and opportunities. For each of the allocations the plan also notable includes a statement summarising the key considerations with a bearing on housing yield / density within the allocation boundary.
- 8.1.4 As well as new proposed allocations, at nine 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 (30 homes), for the fact that a planning application is yet to be submitted and given an adjacent new proposed allocation. Also, a carried forward allocation at Hales (23 homes) is notable on the basis that it is not permitted (but a current planning application is pending determination) and because there is an adjacent new proposed allocation.

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.*”

9 Appraisal of the draft 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).

9.2 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 of the plan-making process. Section 5 explains how work was undertaken to explore high-level alternatives in 2021, and then presents a discussion of possible alternatives at select key village clusters, before concluding on a refined set of reasonable alternatives (for the plan as a whole) that are then a focus of appraisal in Section 6.

9.2.2 The conclusion of the appraisal presented in Section 6 is that emerging spatial strategy is broadly supported, from an accessibility perspective. It is possible to point to adjustments that might possibly be made, but not with any great confidence, because reaching conclusions on 'accessibility' is inherently complicated and ultimately challenging, due to a need to consider several 'dimensions' of accessibility.

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: *“An area of 3.3 ha is allocated for up to 50 dwellings. Due to the delivery of the additional community benefits associated with this site, specifically the improved pedestrian connectivity for the village and the provision of an area of land to support the ongoing pre-school education facility within the settlement, as well as the standard infrastructure requirements, the scale of development proposed is considered to be reasonable in accordance with the objectives of the VCHAP.”*
- GIL1 (South of Geldeston Road and Daisy Way, Gillingham; 35 homes) – will support a **primary school expansion**. The supporting text 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...”*

- 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 strategic **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 planning gain, i.e. 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...”*

- 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 Norfolk and Norwich University Hospital as part of the potential extension of the ‘Pink Pedalway’.*

It is also notable that a low density scheme is proposed, with 35 homes across a 3ha site.

- 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 or no 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 **strategic 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.

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 highlight 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).”* 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 Thurlston). 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).
 - 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 associated 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 a **strategic 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...”*
- TAC1 (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. Similarly, appropriate measures will need to be taken to ensure the continued protection of the protected horse chestnut tree on the site frontage, adjacent to the existing farm access.”*
- 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.”*
- 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.

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, 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.”*
 - DIT1 (Land at Thwaite’s and Tunneys Lane; 35 homes) – is an example of a site where the **site boundary** has 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 amended to minimise the impact of this constraint. It is noted that the identified surface water flowpath contributes to a wider off-site flowpath and the drainage strategy for the scheme will need to respond to this...”*

- 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 SFRA 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.”*
- BAW1 (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.

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 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 whereby there is likely to be relatively unplanned growth. 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 both transport and the built environment. This conclusion in Section 6 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 (78% reduction by 2035, against a 1990 baseline). 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):

*“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]*

9.5.2 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.

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, 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 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, Swardston; 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: *“The site boundaries of VC SWA1 have been drawn to provide a good relationship with the permitted and allocated residential sites to the north and south. A contiguous boundary to the east of these sites will contain the development in the wider landscape, minimising the visual impact of the built form whilst also improving the relationship between all three sites. Opportunities to provide pedestrian and vehicular connectivity between the sites should also be explored at the detailed design stage, as should the implications for the overall drainage strategies. Detailed design matters will also need to consider the relationship between these developments, providing a form and layout that compliments the adjacent schemes...”*

- 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. The supporting text explains: *“For reasons of highway safety, vehicular access to the site is only permissible via Blacksmiths Gardens. The Highways Authority have advised that the standard of road through this development will restrict the scale of development... 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 the only proposed allocation 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 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.

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 where possible of new strategic opportunities, such as those associated with the 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 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.

9.8.1 The discussion in Section 6 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. 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, 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.

9.8.2 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...”*
- BAW1 (Land east of Stocks Hill, Bawburgh; 35 homes) is associated with a village where there is an extensive **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, for which a planning application is yet to be submitted. The supporting text explains: *“The site comprises the southern part of a field in between the existing main part of the village and development around the former Hales Hospital. The site has some significant changes in the topography... An application for 23 dwellings on a larger site area has been submitted and is currently pending determination (2022/0287). The site is adjacent to, and is currently within the same control as, allocation VC HAL1 to the north. To ensure a comprehensive form of development is achieved opportunities to maximise the connectivity between the sites should be explored as far as possible via the development management process. Accordingly, the HAL1 allocation text (now VC HAL2) has been updated to reflect both the boundaries of the planning application and the uplift in the site numbers that is achievable on the larger site.”*

- ROC1 (Land south of New Inn Hill, Rockland St Mary; 25 homes) – is another example of policy requirements set in respect of archaeology. The supporting text explains: *“Archaeological finds have been recorded within the local area and may extend closer to the site. Liaison with the Historical Environment Service will be required as part of the planning application process to determine the requirement for further archaeological investigation.”*
- 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.”*

9.8.3 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.

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 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..."*
 - TAC1 (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 0.6ha has been allocated for up to 25 dwellings. A concept drawing has been provided illustrating that this number of homes could be accommodated on the site however this layout comprises a high number of one- and two-bedroom dwellings, 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**, there is a need to recall that: A) a number of the carried forward allocations will involve fewer than 12 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 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.

9.10 Land, soils and resources

Objective: Ensure the efficient and effective use of land and maintain the integrity of mineral extraction sites and safeguarding areas in the District.

- 9.10.1 The discussion presented in Section 6 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 and 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, south of Church Road, 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.

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 Broadland National Park.

- 9.11.1 A detailed discussion is presented in Section 6, 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. Firstly, consideration is given to proposed allocations in relative proximity to the Broads Authority Area:
- GIL1 (South of Geldeston Road and Daisy Way, **Gillingham**; 35 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 GIL1, 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 Talyer 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 take into consideration the existing mature trees adjacent to the east boundary and it will be necessary to protect these trees during the construction phase of development. Developers will be required to submit an appropriate Landscape and Visual Impact Assessment (LVIA) as part of the detailed planning application and site developers are strongly recommended to liaise with the Broads Authority early in the site planning process in order to ensure appropriate viewpoints are considered at the detailed design stage."*
- HAD1 (Land south of Haddiscoe Manor Farm, Haddiscoe; 35 homes) – is supported for a notably low density scheme, including 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 and development in this location will not have a significant visual impact on the wider landscape. Appropriate landscaping of the site, including but not limited to the protection and enhancement of the existing boundary treatments, will be required due to the proximity of the site to the Broads Area."*
- 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..."*

9.11.4 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:

- DIT1 (Land at Thwaite's and Tunneys Lane; 35 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 Fornetts 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.”*

- WIC1 (Land to the south of Wicklewood Primary School; 30 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 forms a smaller area within a larger agricultural field. As such it is recognised that there are landscape and visual impacts associated with development of this site. However, an assessment of the context of the site has confirmed that with careful landscaping and layout this site offers an opportunity to create a key gateway entrance to the village, as well as reinstate previously lost hedgerow landscape features. To achieve these objectives there will be a particular emphasis on the soft landscaping, on-site tree planting and the layout and design of the site. This landscape focus is reinforced by the organic boundaries of the site. An area of open space in the north east corner of the site will form a visual focal point around the existing village sign, reinforcing the gateway location and retaining an open aspect at the junction...”*
- 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 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.”*

- BAW1 – (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 three 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 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.”*
- TAC1 (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 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.”*
- 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.”

9.11.5 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.

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 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.

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 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 Also, 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 and were also identified as part of the planning application process for the carried forward SWA1; 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..."*
- 9.13.3 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.

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 on in respect of two sustainability topics, the appraisal of the proposed submission plan as a whole – i.e. the proposed strategy / package of allocations plus site-specific policy – predicts positive effects in respect of eight sustainability topics. This reflects the fact the plan presents very 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, in turn, development 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 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 support enhancements to 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 very strongly supported. A very wide range of key issues 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.
- Recommendations – a focus of the SA process has been on highlighting issues / tensions / draw-backs associated with the emerging preferred approach, in respect of specific sustainability topics, such that they might subsequently be addressed, most notably by making adjustments to the spatial strategy, but also through 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 seek to make good use of existing field boundaries, so as to avoid the artificial subdivisions of fields, and submitted sites (reflecting land ownership boundaries) more generally, and that recommendation has been taken onboard and actioned. There has been limited emphasis on making formal recommendations. At the current time this report presents just one formal recommendation, which relates to ensuring that a consistent approach is taken with regards to the policy requirements for avoiding / mitigating biodiversity impacts at those sites that are in proximity (or relative proximity) to a site designated as being of national or international importance for biodiversity. This recommendation might be actioned prior to consultation, or subsequent to consultation, i.e. as part of the examination.
- 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 predicted effects of the plan are ‘indirect’; specifically, 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 in this respect.
- 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 local plan 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) – the Village Clusters Plan supports the GNLP spatial strategy, and no issues or tensions have been highlighted.
 - Broad 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. Also, there is a need to support the vitality of villages closely associated with the Broads, 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 strategy 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 proposed submission / publication plan has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan 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 Local 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 Local Plan will 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
	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
		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
		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

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(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>
(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	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;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(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	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]
(i) a description of the measures envisaged concerning monitoring.	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.	
	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. Sections 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.