

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

Interim SA Report

May 2021

Quality information

Prepared by	Checked by	Verified by	Approved by
Chris McNulty,	Mark Fessey,	Steve Smith,	Steve Smith,
Senior consultant	Associate Director	Technical Director	Technical Director

Prepared for:

South Norfolk District Council

Prepared by:

AECOM Limited Aldgate Tower 2 Leman Street London E1 8FA United Kingdom aecom.com

© 2021 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ("AECOM") in accordance with its contract with South Norfolk District Council (the "Client") and in accordance with generally accepted consultancy principles and the established budget. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

Table of Contents

1	Introduction	
2	What's the plan seeking to achieve?	5
3	What is the scope of the SA?	7
Part	1: What has plan-making / IIA involved up to this stage?	9
4	Introduction to Part 1	10
5	Site options GIS analysis	11
6	Early appraisal work	16
7	Broad distribution alternatives	17
Part	2: What are the appraisal findings at this stage?	18
8	Introduction to Part 2	
9	Appraisal findings	20
10	Summary and conclusions	40
Part	3: What are the next steps?	42
11	Plan finalisation	43
12	Monitoring	43
App	endix I: The SA scope	44
	endix II: Site options GIS analysis	
App	endix III: Early SA Notes	75

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 the 48 Village Clusters in South Norfolk, to accommodate at least 1,200 homes in total.

At the current time the Council is consulting on an early draft plan, under Regulation 18 of the Local Planning Regulations. This Interim SA Report is produced with the intention of informing the consultation and subsequent preparation of the final draft ('proposed submission') version of the plan. Specifically, the focus of this Interim SA Report is an appraisal of the following three **broad distribution alternatives**:

Option	Name	Description
1	Striking a balance	Broadly consistent with the emerging preferred approach, the aim is to strike a balance between the objective of supporting growth in more accessible locations on the one hand, and dispersing growth widely across the District on the other.
2	Accessibility led	Assumes allocations / growth only at the more accessible village clusters.
3	Dispersal led	Assumes a dispersal of growth across all village clusters.

These three broad distribution alternatives were arrived following a lengthy process, as described within Part 1 of this report. One important element of the process involved analysis of the large number site options known to be available and therefore potentially in contention for allocation. The **site options analysis** was a quantitative exercise involving using GIS software to query the spatial relationship between site options with a range of spatial push (e.g. flood risk zones) and pull (e.g. primary school) features for which data is available in digital format for the whole District. The analysis is discussed within Section 5 of the report, and within Appendix II.

A final point to note is in respect the **level of detail** at which the broad distribution alternatives are defined. The current consultation document sets out a list of sites to deliver Option 1, whilst Options 2 and 3 are not defined in site-specific terms. The aim of the appraisal is to strike a balance between: A) taking account of specific sites identified to deliver Option 1, and making cautious assumptions about specific sites that could deliver Options 2 and 3; whilst B) avoiding an undue focus on site-specifics, in the knowledge that the list of sites is subject to change.

Appraisal findings

Appraisal findings are summarised in the table below, and within the subsequent discussion. Within the table, each row deals with a specific sustainability topic, with the aim being to both A) rank the broad distribution alternatives in order of preference; and B) categorise each in terms of 'likely significant effects' on a five point scale.¹

The list of sustainability topics is collectively known as the SA framework, and was established following work in 2020 to 'scope' the SA. Scoping involved a review of evidence on the sustainability context and baseline situation, and publication of a Scoping Report for consultation with the statutory consultees (Environment Agency, Historic England, Natural England). Further information on the SA scope is presented in Section 3 and Appendix I.

¹ Red indicates a significant negative effect; amber a negative effect that is of note but with limited or uncertain significance; no colour indicates a situation whereby it is not possible to confidently reach a conclusion regarding significant effects; light green indicates a positive that is of note but with limited or uncertain significance; and dark green indicates a significant positive effect.

Broad distribution alternatives - summary appraisal findings

Sustainability topic	Option 1 Striking a balance	Option 2 Accessibility led	Option 3 Dispersal led
Accessibility	2	1	3
Biodiversity	7	2	众
Climate change adaptation	=	=	=
Climate change mitigation	2	\bigstar	3
Communities	1		2
Economy	=	=	=
Historic environment	1	1	2
Housing	2	3	\bigstar
Land and soils	=	-	=
Landscape	\uparrow	2	2
Transport	2	1	3
Water	=	=	=

From the table 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 to reflect the strategic objective 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 because they "are often built-out relatively quickly") and the emerging GNLP (paragraph 381; including because smaller sites are suited to delivery by 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, and which may tend to be associated with a degree of relative environmental sensitivity.

Finally, beyond examining the merits of three alternative approaches to distribution / allocation (one being the emerging preferred option), the appraisal examines the emerging preferred approach to site-specific policy.

As part of this, there has been a particular focus on the emerging preferred approach to amending site boundaries and identifying developable areas within site boundaries, with it often being the case that smaller developments are supported, when there is land available to potentially support a larger scheme. There are often good arguments for supporting smaller schemes, for example in terms of landscape and access, and it is a stated objective of the Village Clusters Plan to support smaller schemes; however, there is a need to avoid the risk of piecemeal growth in the long term, which can lead to opportunities missed in respect of comprehensive planning and the realisation of infrastructure and environmental benefits. It is recommended that there should be a focus on allocating well contained sites as far as possible, which typically means allocating whole fields contained by existing boundaries.

These appraisal findings are published for consultation at the current time, in order to inform the consultation, and will be taken into account by the Council - alongside consultation responses received – when finalising the plan for publication and submission.

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 48 Village Clusters in South Norfolk, to accommodate at least 1,200 homes in total.
- 1.1.2 SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is a legal requirement 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. In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be considered alongside consultation responses when finalising the plan.
- 1.2.2 More specifically, the SA Report must answer the following three questions -
 - What has Plan-making / SA involved up to this point?
 - including with regards to 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 Interim SA Report

- 1.3.1 At the current time the Council is consulting on an *early* draft plan, under Regulation 18 of the Local Planning Regulations. The consultation document:
 - presents preferred sites for allocation, as well as a shortlist of omission sites considered to remain in contention for allocation, plus a list of other sites submitted but discounted by the Council;
 - sets out identified issues and opportunities associated with all the supported sites and seeks views on key matters to include within site-specific policy at the next stage; and
 - identifies three potential new areas for district-wide development management policy.
- 1.3.2 This 'Interim' SA Report is produced with the intention of informing the consultation and subsequent preparation of the final draft ('proposed submission') version of the plan.

Structure of this report

- 1.3.3 This report is focused on appraisal of reasonable alternatives (RAs). It is structured in three parts:
 - Part 1 (plan-making / SA involved <u>up to this point</u>) explains work undertaken to arrive at RAs;
 - Part 2 (SA findings <u>at this stage</u>) presents the appraisal of RAs, including the preferred option;
 - Part 3 (next steps) discusses next steps in the plan-making / SA process.
- 1.3.4 Before answering the first question, there is a need to further set the scene by answering two initial questions on the scope of the plan-making and SA process.

² The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document, to inform consultation and subsequent plan finalisation.

2 What's the plan seeking to achieve?

2.1 Overview

- 2.1.1 The Village Clusters Plan aims to deliver sustainable growth within the more rural parts of South Norfolk. It is being developed alongside the GNLP and in accordance with Government's national planning policies and guidance. The main aim of the Plan is to allocate a series of smaller sites, typically between 12 to 50 homes, across the 48 Village Clusters in South Norfolk, to accommodate 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 generally supportive of new development, subject to the usual planning considerations such as access, amenity, landscaping etc.
- 2.1.3 Important context comes from paragraph 78 of the National Planning Policy Framework (NPPF), which encourages local planning authorities to "identify opportunities for villages to grow and thrive, especially where this will support local services." Paragraph 78 also goes on to explain that: "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. The Village Clusters Plan helps to deliver on these requirements, both through allocations and by expanded Settlement Limits.
- 2.1.5 Important context also comes from the emerging GNLP, which focuses growth at Norwich 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 (2021) 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 GNDP, around half has either already been built during 2018/19 and 2019/20, 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). 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
 - 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.

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 polices 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. 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 through the allocation of viable and deliverable development sites, ensuring that
 housing sites provide an appropriate mix of house types, sizes and tenures, e.g. homes for first time
 buyers, those seeking family housing and those looking to downsize in later life; also to provide
 opportunities for 'self-builds' through the amendment of settlement boundaries in appropriate locations.
 - Protect village communities and support rural services and facilities by providing new housing in a
 range of settlements within the village clusters to support local services and facilities, meeting the
 needs of a range of occupiers with the potential to support different local services and facilities.
 - Protect the character of villages and their settings by ensuring that the scale, location and density of
 housing is well related to the form and character of existing villages, and ensuring 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.
- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA, with further information presented within **Appendix I** 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

- 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.³ 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.
- 3.2.2 Comments are welcomed on the SA scope at the current time.

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.

³ 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?

Part 1

4 Introduction to Part 1

- 4.1.1 The aim here is to introduce the information set out in this part of the report, i.e. provided in order to answer the question: What has plan-making / SA involved up to this stage?
- 4.1.2 In particular, there is a need to explain the process that led to the **reasonable alternatives (RAs)** that are a focus of the appraisal within Part 2 of this report.
- 4.1.3 Explaining this process is in-line with the legal requirement for the SA Report⁴ to present "an outline of the reasons for selecting the alternatives dealt with" or, in short, **outline reasons for selecting the RAs**.

Reasonable alternatives in relation to what?

- 4.1.4 The legal requirement is to examine reasonable alternatives taking into account the objectives of the plan,⁵ which are introduced above (Section 2.5). In light of the plan objectives, it was considered appropriate to focus on alternative approaches to distributing sites across the District in order to provide for at least 1,200 homes in line with the GNLP. Alternatives of this nature can be termed **distribution RAs**.
- 4.1.5 However, it was a challenge to determine precisely what form these should take. In theory, the ideal is to explore district-wide site specific distribution RAs; however, the fact that the Village Clusters Plan aims to allocate a large number of small sites means that the number of reasonable site combinations is vast. Another option would be to define and appraise distribution RAs (which might also vary in respect of growth quantum) for each village cluster; however, this approach was also considered to be unrealistic at this early stage in the plan-making process.
- 4.1.6 Ultimately, a decision was taken to focus on appraisal of *broad* distribution RAs, defined as:

The emerging preferred approach to allocation (i.e. a list of site allocations) plus one or more alternative approaches defined in broad (i.e. non-site specific) terms, but with sensible assumptions made in respect of the specific sites that would be allocated.

Structure of this part of the report

- 4.1.7 Sections 5 and 6 describe two key inputs to the process of arriving at broad distribution RAs, whilst Section 7 explains the final steps in the process and introduces the RAs ultimately arrived at. In summary:
 - Section 5 explains the step of site options GIS analysis;
 - Section 6 discusses early appraisal work; and
 - Section 7 sets out the broad distribution RAs.

Commenting on this part of the report

- 4.1.8 Comments are welcomed on:
 - what the requirement to explore RAs means in the context of the Village Clusters Plan;
 - the process of arriving at broad distribution RAs and the RAs ultimately arrived at; and
 - what work should be undertaken subsequent to the current consultation in respect of RAs.

Part 1 10

4

⁴ This report is not the SA Report; however, providing this information at the current time is in accordance with the spirit of the SEA Regulations and will ensure that the required information is available to enable preparation of the SA Report in the future.

⁵ Under Regulation 12(2) of the SEA Regulations there is a requirement for the SA Report to present an appraisal of "reasonable alternatives taking into account the objectives and geographical scope of the plan".

5 Site options GIS analysis

5.1 Introduction

- 5.1.1 Whilst the Council has led on the process of analysing and appraising the merits of individual site options, through the Housing and Economic Land Availability Assessment and a more detailed site assessment process, AECOM also undertook **quantitative GIS analysis** of all site options.
- 5.1.2 Specifically, the analysis involved 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.
- 5.1.3 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. The limitations are such that there is little or no potential to reach conclusions on 'significant effects', hence the exercise is not technically 'appraisal'.
- 5.1.4 The primary aim is to build evidence to feed into the selection of RAs for formal appraisal; however, it is recognised that those with a site-specific interest will have an interest in the analysis in and of itself.
- 5.1.5 This section is structured as follows:
 - Section 5.2 explains the process of identifying site options;
 - Section 5.3 introduces the GIS analysis methodology; and
 - Section 5.4 presents a 'window' into findings of the analysis, which are presented in Appendix II.

5.2 Identifying site options

5.2.1 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. Almost 450 sites have been assessed for this consultation."

5.2.2 The Council passed site options to AECOM for appraisal in September 2020. Subsequent to that time further work has been undertaken by the Council to amend site boundaries and identify developable areas within site boundaries; however, it was not possible to undertake a second round of GIS analysis.

5.3 GIS analysis methodology

- 5.3.1 To reiterate two important points made above:
 - A quantitative GIS-based methodology was employed that involved measuring the spatial relationship between site options and a range of push/pull features for which data is available in digitally mapped form across the District as a whole.
 - For each measure, the aim was to differentiate the performance of the site options and, in particular, to identify site options that stand-out as performing notably well or notably poorly. The aim was not to reach strong conclusions on absolute performance (e.g. in terms of 'significant effects').

5.3.2 Given available data it was possible to meaningfully differentiate the site options under nine broad headings. These nine headings relate quite well to the SA framework (Table 3.1); however, there are gaps in the analysis; for example, there is limited or no potential to draw on available GIS data to differentiate the merits of the site options in respect of climate change mitigation. Also, it is generally the case that, on the basis of the available datasets, there is more limited potential to appraise the merits of site options in terms of socio-economic objectives, relative to environmental objectives. Comments are welcome on additional data-sets that could or should be used to differentiate site options.

5.4 Summary findings of the analysis

- 5.4.1 Detailed findings of the analysis are presented in **Appendix II**, which contains a large 'matrix' comprising a row for each of the site options, and columns for each of the measures in terms of which it is possible to meaningfully differentiate the performance of the site options.
- 5.4.2 Set out below is a discussion that aims to provide a 'window' into the analysis. Specifically, under nine thematic headings, the aim is to describe the performance of site options, identifying sites and groups of sites (e.g. sites at a particular settlement) that stand-out as performing notably well or notably poorly.

When was this analysis undertaken?

5.4.3 The GIS analysis was 'run' in September 2020, and an initial write-up of the analysis was presented to the Council in early October. As such, the Council was able to draw on findings of the GIS analysis as part of the site assessment / site selection process.

Air quality

5.4.4 There are no sites with direct sensitivity in relation to the Central Norwich AQMA which is over 4km from all but two sites (both of which are still at least 2.8km from the AQMA). However, it is of note that the **Little Melton and Great Melton** cluster includes a total of 15 sites which are collectively 79ha in area, whilst the **Mulbarton**, **Bracon Ash**, **Swardeston and East Carleton** cluster includes 25 sites totalling 197ha overall. Both clusters are located close to the Norwich urban area and to key strategic roads flowing into the Central Norwich AQMA and are of a scale which could increase traffic through the AQMA.

Biodiversity

- 5.4.5 Village clusters at the north and east of the District stand out as having greatest sensitivity in terms of proximity to designated sites of international biodiversity significance associated with the Broads. The villages of Geldeston, Gillingham, Rockland St Mary and Surlingham collectively include 17 sites within 1km of the Broadland Special Protection Area (SPA) or the Broads Special Area of Conservation (SAC). Although this 1km distance has no formal significance, it is a distance within which new development could generate additional recreational pressure on the designated sites without mitigation.
- 5.4.6 Whilst it is noted that the majority of sites within these villages are small, with most being under 1ha in area, attention is drawn to **Rockland St Mary** which includes a strategic scale site of 15.5ha (Land West Of Lower Road SN0531). A site of this size could theoretically support significant levels of growth at a location which provides a recreational entry point to the waterways of the Broads via the Rockland Staithe.
- 5.4.7 Despite the wide distribution of Sites of Special Scientific Interest (SSSIs) throughout the District, only a small number of sites fall within close proximity of a SSSI. This includes five sites within 50m and a further three sites within 100m. However, all but one of these sites are small at around 0.5ha. The exception is site SN0345 (Land North of Loddon Road) in the **Ditchingham** cluster which is 1.6ha in size and 30m from the Broome Heath Pit SSSI, a distance that gives rise to considerable concern, in that effective mitigation (e.g. by delivering a significant part of the site as green infrastructure) would be challenging.
- 5.4.8 At a localised scale, several sites are within close proximity to a County Wildlife Site (CWS), with 34 sites falling within 100m and a further seven sites falling partially intersecting a CWS, namely one sites at each of the following villages: Bawburgh, Bergh Apton, Bracon Ash, Intwood, Yelverton, Woodton.
- 5.4.9 There are also five sites within 100m of a Local Nature Reserve (LNR), although this is not necessary a constraint, as LNRs are always managed for access. However, one site does give rise to concern, namely SN0346 at Broome village cluster in the east of plan area, which is 100% within a LNR.

Flood risk

- 5.4.10 The majority of village clusters are not notably affected by fluvial flood risk though there are some notable exceptions. The **Needham, Brockdish, Starston and Wortwell** cluster includes two sites which are largely within Flood Zone 3b, i.e. the functional flood plain; and one of these sites SN4084 (Land South East of Low Road) at Wortwell is also 97% within an area of surface water flood risk. Similarly, the **Hempnall, Topcroft Street, Morningthorpe, Fritton, Shelton and Hardwick** cluster includes three small sites which intersect with Flood Zone 3a, all of which are also affected by surface water flood risk.
- 5.4.11 In broad terms, few sites are significantly affected by fluvial flood risk and these are relatively isolated in terms of their spatial distribution. Surface water flood risk is much more widespread within the District, and correspondingly affects a greater number of sites and village clusters. However, only a small proportion of sites are affected by surface water flood risk across more than 25% of their area (63 sites, or around 14% of the total number of sites). The widespread nature of surface water flood risk means that clear spatial patterns in relation to surface water flood risk do not emerge.

Heritage

- 5.4.12 Taking conservation areas as proxies for 'hotpots' of historic environment sensitivity and historic character, it is apparent that a large number of village cluster sites appear relatively unconstrained by proximity to clusters of historic assets. Only 58 village cluster sites, around 13% of the total, are within or adjacent to a conservation area. Of these, the most affected village appears to be **Brooke**, with seven sites either within or adjacent to the conservation area. This is followed by **Dickleburgh** with five sites, and **Pulham St Mary, Scole, Seething, Shotesham and Tacolneston** with four sites.
- 5.4.13 Also of note is the **Mulbarton** Conservation area, where several large sites, including the largest site in the appraisal at 130ha (SN0315 Land to East of Mulbarton) are within 100m of the conservation area. Should this site, or a combination of the other large sites in the cluster, come forward, then the Mulbarton, Bracon Ash, Swardeston and East Carleton cluster stands out as having potential for significant effects.
- 5.4.14 In relation to specific historic assets, there are 19 sites are within 100m of a Grade 1 (i.e. highest tier) listed building, although it is important to note that the setting of such listed buildings can sometimes extend beyond this distance. In all but three of these cases the listed building in question is a parish church. The only *non-church* Grade 1 listed building potentially at risk is the Scole Inn, in the **Scole** cluster in the far south of the District, where the nearest site option is circa 50m distant.
- 5.4.15 It is also of note that only two sites are within very close proximity of a scheduled monument and both of these are in the same village cluster, namely **Tasburgh** in the centre of the District. Sites SN0413 and SN4079 are within 50m of the 'camp in village' scheduled monument and are collectively around 4.7ha in size, giving rise to the potential for development of a scale which could alter the way in which the scheduled monument is perceived within the landscape and the wider historic environment.
- 5.4.16 No village clusters stand out as being of notable sensitivity in relation to a Registered Park and Garden.

Landscape

- 5.4.17 The designated strategic gaps separating Norwich, Hethersett and Wymondham are intended to preserve the landscape and townscape character of each of the settlements by preventing coalescence between them. Only one of the village cluster sites intersects with the strategic gaps Site SN3031 (Cantley Lane, **Ketteringham**) which falls entirely within the strategic gap between Herthersett and Norwich.
- 5.4.18 The designated River Valleys are a key local landscape designation intended to protect and enhance the distinctive landscape character of South Norfolk's river valley corridors and their surrounding areas. In this context it is of note that several village clusters include sites which are partially or wholly within the River Valley boundaries, including a number of clusters at which almost every single site is within or adjacent to the designation. The most notable of these include:
 - Bawburgh all six sites totalling 20.3ha are wholly or partially within the Yare River Valley;
 - **Ditchingham, Broome, Hedenham and Thwaite** 11 of its total 13 sites are at least 85% within the Waveney River Valley, with the remaining two adjacent to it.
 - Kirby Cane and Ellingham 11 of its total 12 sites are at least 90% within the Waveney River Valley;

• Needham, Brockdish, Starston and Wortwell - 13 of its total 16 sites are at least 93% within the Waveney River Valley.

Soils

- 5.4.19 The plan area has no areas of the highest quality Grade 1 agricultural land, and only limited and isolated areas of Grade 2. Sites in **Burgh St Peter** in the east of the plan area, **Rockland St Mary and Bergh Apton** in the north, **Barnham Broom** in the far west and stand out as the only clusters to include multiple sites entirely underlain by Grade 2 agricultural land, though a small number of individual sites within other clusters are also affected by Grade 2.
- 5.4.20 However, a significant number of sites spread right across the full extent of the District are underlain by Grade 3 land. Grade 3 may or may not be 'best and most versatile' (BMV) land, depending on whether it is Grade 3a (BMV) or 3b (poorer quality). The national dataset does disaggregate Grade 3 land into Grade 3a and 3b and so it must be assumed that a large number of village clusters have potential to be underlain by BMV land.

Index of multiple deprivation

- 5.4.21 The development process can offer opportunities to address issues of rural deprivation ('left behind communities') by improving access to community services, education and employment. Therefore, areas which the Index of Multiple Deprivation (IMD) data indicates are relatively more deprived could potentially be targeted through the development process.
- 5.4.22 In this sense, the **Tasburgh** cluster stands out as performing relatively poorly in terms of multiple deprivation. Also of note is the wide range of IMD rankings within the **Mulbarton**, **Bracon Ash**, **Swardeston and East Carleton** cluster, i.e. there is clear variation in deprivation within the cluster.
- 5.4.23 Conversely, it is notable that the entire village cluster of Burston, Shimpling and Gissing ranks at the top of the IMD data, indicating that the whole cluster records low instances of deprivation across all domains.

Services and facilities

- 5.4.24 Town and village retail centres will anchor the village clusters with a range of services, facilities and employment and proximity to these centres will be a key determinant of the sustainability of the sites within the village clusters. It is therefore notable that sites within several village clusters do not offer easy access to identified town and village centres. There are nearly 200 sites across 32 village clusters which are over 5km from the nearest identified centre, suggesting a likelihood of car dependency and access challenges, particularly for those without easy access to a private car. However, many of these sites and clusters do benefit from much more proximate access to local services, such as a village shop.
- 5.4.25 Broadly, the District has good coverage of primary schools in spatial terms (though individual school capacity will also be a factor as to the degree of growth each school can support). However, several village clusters are relatively remote from primary schools within the District (or Norwich). Sites in the villages of **Brockdish** in the far south of the plan area, **Burgh St Peter** in the far east of the plan area, **Topcroft** in the centre of the plan area and **Tibenham** in centre-west of the plan area are all beyond 3km of a primary school.
- 5.4.26 At the other end of the scale, there are a significant number of village clusters which include sites within 1km of a primary school and are likely to support easy access, including by walking and cycling. A total of **270 sites fall within 1km of a primary school**, with a further 113 sites under 2km. This means around 85% of sites are within 2km straight line distance of a primary school, suggesting a high proportion of village clusters are likely to deliver sites within the 3.2km (i.e. two miles) statutory walking distance of primary schools as per Department of Education (DoE) guidance.⁶

⁶

- 5.4.27 The **Burgh St Peter** sites again stand out as remote from secondary schools, with all sites here being over 10km from the nearest facility at Cliff Park High Ormiston Academy in Great Yarmouth. However, overall there is a good distribution of secondary schools serving the District and the overwhelming majority of sites are within the DoE's statutory distance of 9.3km (six miles) for 11-16 year olds.
- 5.4.28 Some village clusters are notable for including sites which support notable good access to secondary schools, particularly the Morely and Deopham cluster, which includes five sites within 1km of the Wymondham College.

Settlement boundaries

- 5.4.29 A large number of sites are either within or adjacent to existing Settlement Limits, suggesting that in principle they are more likely to support development which has good regard for an existing settlement and more likely to have strong functional and visual connectivity with existing development. A total of 250 sites are either within or directly adjacent to a Settlement Limit, with a further 65 sites falling within 20m.
- 5.4.30 The remaining sites are further from existing development, with several sites standing out as notably isolated in character or likely to present as separate or distant from an existing settlement. 30 sites are over 1km from an existing Settlement Limit. The village cluster of **Mulbarton**, **Bracon Ash**, **Swardeston and East Carleton** proposes the greatest number of sites over 1km from a Settlement Limit, with six in total. The strategic scale 23.7ha site SN0476 (North of BB Golf Club) in the north west of the plan area stands out as being the largest site entirely remote and disconnected from a settlement.

6 Early appraisal work

6.1 Introduction

- 6.1.1 This is the second of two sections explaining key inputs to the process of arriving at broad distribution alternatives. Specifically, this section introduces the early appraisal work undertaken by AECOM between late 2020 and early 2021, as set out within a series of five SA Notes submitted to the Council.
- 6.1.2 The five SA Notes are included as **Appendix III** of this report, albeit appraisal findings presented within each of the notes is now somewhat out-of-date. The aim of this section is to present summary findings.

Overview of the early appraisal work

6.1.3 Because of the large number of site options, and the large number of village clusters in contention for one or more allocations, a staged approach to site selection was pursued, led by the Council. A key aspect involved a series of five informal non-public meetings between Officers and Councillors in late 2020 and early 2021, with each meeting dealing with a tranche of circa ten village clusters, such that all 48 village clusters were covered across the series of meetings. At each meeting Councillors were presented with a list of the Officers' preferred allocations and a shortlist of omission sites based upon the findings of the detailed site assessment process, with a view to confirming a list of the most preferable allocations moving forwards through the process. At each meeting Councillors were also presented with an SA 'Note' prepared by AECOM, which sought to present a commentary on the favoured allocations under each of the 12 SA framework headings, as well as a short commentary on the shortlisted omission sites.

6.2 Summary appraisal findings

- 6.2.1 Each of the five SA Notes ended with a conclusions section, highlighting key issues, opportunities and likely impacts associated with the preferred allocations (and shortlisted omission sites). Key conclusions of these SA Notes included:
 - Limited potential for significant effects a conclusion of all five Notes was that "the majority of preferred
 sites have no notable sensitivity in relation to the majority of SA themes and development would be
 unlikely to result in significant effects." This is a clear conclusion; however, it is also subject to change,
 as an understanding of issues and opportunities improves.
 - Accessibility the majority of preferred 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 preferred allocations the appraisal raised notable concerns with: preferred sites at
 Ditchingham (biodiversity, historic environment, landscape); the preferred site at Tasburgh (historic
 environment, landscape and transport); preferred site SN4048SL at Hapton (biodiversity, accessibility
 and transport); preferred site SN1015 at Hempnall (historic environment and flood risk); preferred sites
 SN4015 and SN4017 at Burgh St Peter (accessibility, economy and transport); preferred site SN0414
 at Haddiscoe (setting of the Broads National Park and loss of agricultural land; although it is recognised
 that in practice development would be supported on only a proportion of the site) and the preferred
 site at Geldeston (proximity to, and upstream of, the Broads).
 - Gillingham the fifth SA Note reached a notable conclusion in respect of the three preferred sites at
 Gillingham, which is a village located a short distance to the northwest of Beccles, on the A146: "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..."
 - Strong performing shortlisted omission sites each of the five SA Notes reached a conclusion that: "In general... the preferred sites perform well in relation to the omission sites." However, the appraisal commentaries did highlight a number of instances of shortlisted omission sites performing better than preferred sites within the same village cluster in respect of at least one SA topic.

7 Broad distribution alternatives

7.1 Introduction

7.1.1 The aim here is to *introduce* the broad distribution alternatives that are a focus of appraisal within Part 2 of this report. The alternatives were arrived at in early 2021 in light of the SA inputs discussed above (Sections 5 and 6) and other workstreams led by the Council, notably the site assessment process.

7.2 Introducing the broad distribution alternatives

- 7.2.1 A preferred approach to allocation emerged over a period of several months in late 2020 / early 2021. This was primarily on the basis of a site assessment process led by the Council. Another key input was a Technical Consultation with both internal and external consultees, e.g. on highways matters. Furthermore, early SA work as discussed above in Sections 5 and 6 fed into site selection.
- 7.2.2 One of the key issues to emerge was something of a tension between, on the one hand, the stated objective of the Village Clusters plan to distribute growth widely across a rural area with, on the other hand, a need to direct growth to locations that are accessible to higher order services, facilities and employment areas, in particular by 'sustainable' modes of transport'. As explained at paragraph 103 of the NPPF: "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas..."
- 7.2.3 Transport concerns associated with a dispersal strategy are set to reduce year-on-year over the next decade, as the car fleet switches from petrol, diesel and hybrid to electric vehicles, noting: the commitment made by the Government in 2020 to end the sale of new petrol and diesel cars and vans by 2030; £1.3 billion committed by the Government in its Ten Point Plan for a Green Industrial Revolution(2020) "to accelerate the roll out of charging infrastructure"; and a forthcoming national Transport Decarbonisation Plan and related Green Paper. However, there remain arguments for supporting growth in more accessible / better linked locations, both in the short to medium term i.e. whilst the switch-over to electric vehicles is ongoing and in the longer term, i.e. even once the switch-over has occurred.
- 7.2.4 As such, the Council and AECOM recognised the need to explore issues and opportunities through an appraisal of the following broad distribution alternatives:
 - Option 1: Striking a balance (broadly consistent with the emerging preferred approach) recognises
 that some village clusters perform less well in respect of 'sustainable' accessibility to services/facilities

 whether that be lower order (e.g. a primary school) or higher order (e.g. a secondary school) and
 gives weight to this issue.
 - Option 2: Accessibility led gives particular weight to the issue of accessibility / connectivity by sustainable modes of transport, such that growth would be concentrated at a selection of the village clusters, somewhat contrary to the stated objective of the Village Clusters Plan.
 - Option 3: Dispersal led assumes that growth would be dispersed across the 48 village clusters as far as reasonably possible, mindful of paragraph 188 of the GNLP (2021), which commends the village clusters approach as 'innovative', and paragraph 381, which states: "Locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services... this approach also 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."
- 7.2.5 The three alternatives are a focus of appraisal in Part 2, below.

⁷ The current consultation document introduces the site assessment process as follows: "Whilst the HELAA provides a starting point, the full site assessment is a more detailed process which includes looking at the planning history of the site, undertaking a site visit and applying some more detailed criteria. Most noticeably the site assessment added criteria relating to the local Landscape Character Assessment, Better Broadband for Norfolk and revised the distance to services criteria to better reflect the rural nature of the Village Clusters Plan. Specifically regarding the latter, the Village Clusters assessment has widened the number of services to which distances to/from the site have been assessed, to include some which are characteristic of rural villages, a village/community hall and pub, as well as pre-school provision and formal sports facilities. The maximum distance to services was also increased... However the choice of sites has still been informed by the need for safe and convenient access..."

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

8 Introduction to Part 2

8.1.1 The aim of this part of the report is to present an appraisal of the broad distribution alternatives introduced above, within Part 1. To recap, the three alternatives are as follows:

Option	Name	Description
1	Striking a balance	Broadly consistent with the emerging preferred approach, the aim is to strike a balance between the objective of supporting growth in more accessible locations on the one hand, and dispersing growth widely across the District on the other.
2	Accessibility led	Assumes allocations / growth only at the more accessible village clusters.
3	Dispersal led	Assumes a dispersal of growth across all village clusters.

Level of detail

8.1.2 The current consultation document sets out a list of sites to deliver Option 1, whilst Options 2 and 3 are not defined in site-specific terms. The aim of the appraisal is to strike a balance between: A) taking account of specific sites identified to deliver Option 1, and making cautious assumptions about specific sites that could deliver Options 2 and 3; whilst B) avoiding an undue focus on site-specifics, in the knowledge that the list of sites is subject to change.

Appraisal methodology

- 8.1.3 The appraisal aims to explore the 'likely significant effects' of the broad distribution alternatives on the sustainability baseline, drawing on a list of sustainability topics and objectives, as identified through SA 'scoping', as a methodological framework.
- 8.1.4 For each sustainability topic, in addition to reaching conclusions on likely significant effects, the appraisal additionally aims to differentiate between the alternatives in more general terms, leading to an order of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of significant effects.
- 8.1.5 The appraisal draws upon a broad range of technical evidence, including:
 - evidence base work undertaken by or on behalf of the Council;
 - the GIS analysis and early SA work discussed above, in Sections 5 and 6; and
 - an understanding of spatial constraint and opportunity features mapped digitally and available to view and interrogate via nationally available platforms (e.g. <u>magic.gov.uk</u>) or using GIS software.
- 8.1.6 Effects are also predicted taking account of the criteria presented within Regulations (Schedules 1 and 2 of the SEA Regulations, 2004). For example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered, i.e. the effect of any given broad distribution option in combination with other planned or on-going activity, including sub-regionally.
- 8.1.7 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the alternatives (see discussion on 'level of detail', above). The ability to predict effects accurately is also limited by understanding of the baseline, both now and in the future under a no plan / business as usual scenario. In light of this, there is a need to make considerable assumptions as part of the appraisal, which are set out in the appraisal text.

Structure of the appraisal

- 8.1.8 As discussed, the focus of the appraisal is the list of three broad distribution alternatives introduced above, mindful of the list of sites identified to deliver the Option 1, and with cautious assumptions made regarding specific sites that could potentially deliver the two other options.
- 8.1.9 Each appraisal section also ends with a short **commentary on emerging policies**, which aims to explore the site specific 'reasoned justification' text set out within the current consultation document.

Part 2

9 Appraisal findings

9.1.1 Appraisal findings are presented across 12 sections below, with each section dealing with a specific sustainability topic. Each section begins with a summary table, which both ranks the broad distribution alternatives in order of preference and categorises each option in terms of 'likely significant effects' on a five point scale (red / amber / no colour / light green / dark green).8

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.

Option 1	Option 2	Option 3
Striking a balance	Accessibility led	Dispersal led
2		3

- 9.2.1 There is a need to consider the relative merits of the options in respect of two strands of accessibility, namely local accessibility to services within a village cluster and external accessibility to services at higher tier settlements, either within the District itself or just beyond.
- 9.2.2 Beginning with Option 1, and focusing firstly on external accessibility, account is clearly taken of proximity to higher tier settlements and therefore potential for access to services at these settlements by public transport. A small number of village clusters additionally offer some potential to support walking and cycling to higher tier settlements. The District's seven defined town and village centres provide the broadest range of goods and services within South Norfolk itself, whilst a number of village clusters are conveniently served by higher tier settlements just beyond the District boundary, particularly Beccles and Bungay to the east and Norwich and its suburbs to the north.
- 9.2.3 Specifically, the pattern of growth under Option 1 would take some advantage of proximity to these higher tier settlements both within and outside the District:
 - In the south, Option 1 would deliver growth at the village clusters of Bressingham, Dickleburgh and Scole, from which convenient and sustainable access is available to services at Diss.
 - In the south east, growth at Needham, Pulham St Mary and Wortwell offers convenient and sustainable access to services at Harleston.
 - In the east and north east, growth at Broome, Ditchingham, Earsham, Ellingham, Gillingham and Kirby Kane offer convenient, sustainable access to services at Bungay and/or Beccles.
 - In the north, growth at Hales would support access to services at Loddon, whilst in the west growth at Spooner Row would support sustainable access to services at both Wymondham and at Attleborough.
 - On the Norwich fringe, Option 1 would bring forward growth at settlements such as Bawburgh and Little Melton, from which travel distance to services within the Norwich urban area is short.
- 9.2.4 However, Option 1 would also direct some growth to village clusters which are less well connected to higher tier settlements. In these instances it becomes important to understand the potential for local accessibility to *internal* accessibility, i.e. access to services within the village clusters. Where such local accessibility is strong, this contributes to a stronger overall performance for the option, whilst where they are weaker, this reduces the option's overall performance.
- 9.2.5 In this regard, Option 1 continues to perform reasonably well, directing growth to a number of village clusters with a good range of local services to which walking and cycling access is possible. Village clusters which benefit from the widest range of local services (i.e. at least a primary school, GP surgery, village shop and a pub) include Hemphall, Mulbarton, Pulham Market and Rockland St Mary.

⁸ Red indicates a significant negative effect; amber a negative effect that is of note but with limited or uncertain significance; no colour indicates a situation whereby it is not possible to confidently reach a conclusion regarding significant effects; light green indicates a positive that is of note but with limited or uncertain significance; and dark green indicates a significant positive effect.

- 9.2.6 It is noted that the pattern of growth under Option 1 would also see development come forward at a number of village clusters at which a more limited range of services is available, though the majority of these include at least a primary school and village shop. This includes a wide dispersal of settlements, notably Barnham Broom, Kirby Cane/Ellingham, Seething and Woodton.
- 9.2.7 However, Option 1 would also direct some growth to village clusters with poor sustainable accessibility to higher tier services and local services. The option would mean some development is distributed to remote or poorly connected settlements with few local services, including Ashwellthorpe, Burgh St Peter and Haddiscoe. Development at these settlements would likely embed car dependency as a means of accessing all key services, including education, healthcare, retail, and employment.
- 9.2.8 Table 9.1 serves to highlight that the preferred sites, on average, perform broadly on a par with omission sites in terms of proximity to community services and facilities. The only significant finding is in respect of proximity to a primary school, where the analysis serves to suggest that this was a key consideration when selecting sites for shortlisting and allocation.

Table 9.1: A	Average	distance	to	communit	v facilities

	Average distance of preferred sites (m)	Average distance of shortlisted sites (m)	Average distance of rejected sites (m)
GP surgery	3300	2955	3040
Primary school	712	585	1135
Secondary school	5050	5126	4530

- 9.2.9 The following bullet points consider select preferred sites:
 - Bergh Apton SN0412 (Former concrete works, Church Road; 25+ homes) is circa 400m from the
 Bergh Apton settlement boundary, and 2km from the Alpington, where the primary school is located.
 The site is preferred on the basis that it is a brownfield site, with the reasoned justification text
 explaining: "Whilst the site is not ideal in terms of highways access, the traffic generated by former
 uses (and potential lawful uses of the site) can be offset against the traffic from any redevelopment."
 - Brooke the two preferred sites are near adjacent and together will deliver around 50 homes at a location at the edge of the village, where development will serve to extend an existing linear built form. The sites would have good walking access to the village primary school; however, there is a need to question whether allocation would risk problematic piecemeal expansion in the long term, noting that both preferred sites form small parts of much larger fields that together wrap around the northern extent of the village. Whilst a larger, comprehensive northern village expansion would be outside the scope of the Village Clusters Plan, there is a need to consider its merit from a built form and communities perspective.
 - Kirby Cane, Little Melton, Rockland St Mary and Winfarthing preferred sites at these four villages
 are also somewhat extend an existing linear built form. Whilst it is recognised that linear frontage built
 form is to some extent characteristic of rural South Norfolk (also, in the case of Kirby Cane and
 Winfarthing, the preferred sites would serve to enhance 'gateways' to the village), there is a need to
 recognise the merits of a nucleated village form, including in terms of supporting walking and cycling.
 - Woodton the three preferred sites (two allocations and a Settlement Limit expansion) are adjacent
 and notably separated from the main village core; however, they are in close proximity to the village
 primary school and recreation ground, hence there is clear merit to supporting a concentration of
 growth in this location, from a communities perspective.
 - Mulbarton, Bracon Ash, Swardeston and East Carleton there are two preferred sites at this village cluster one at Mulbarton and one at Swardeston; however, there is a need to question whether the focus of growth should be more firmly at Mulbarton, as this is a large village with a relatively good offer of local services and facilities. The preferred site at Mulbarton (SN2038, South of Rectory Lane) comprises a small part of a much larger field, which suggests that there could feasibly be the option of a larger, more comprehensive scheme (albeit not through the Village Clusters Plan), although the plan document does explain that highways considerations support a modest sized scheme.

- Similarly, there is a need to question the balance of growth between Pulham Market (20 homes) and Pulham St. Mary (50 homes), given that the local primary school is located at Pulham Market, albeit the two villages are similar in scale and the primary school at Pulham Market is, in practice, accessible from the preferred site at Pulham St. Mary via a footway (at a distance of circa 1km).
- 9.2.10 Under Option 2, growth would be concentrated at village clusters from which the widest range of services and facilities can be accessed by convenient and sustainable modes of travel, particularly walking, cycling and public transport. This would mean growth would be distributed across fewer village clusters than under Option 1, with a greater quantum of housing being delivered at each of those settlements found to support best accessibility. In practice, this is likely to mean that the greatest proportion of growth would be delivered at locations with the very best level of both internal and external accessibility. This would include settlements such as Ditchingham in the south-east, Scole in the south and Little Melton in the north (particularly once new services at the existing 'Land North of Hethersett' allocation are complete), with the balance of growth coming forward at a relatively small number of village clusters with the greatest range of local services, i.e. those with at least a primary school, GP surgery, village shop and pub.
- 9.2.11 Therefore, the overall pattern of growth under Option 2 would be much less expansive than under Option 1, with spatial distribution of development more limited and the number of settlements at which allocations are proposed being considerably fewer. The focus would be on intensifying growth at a smaller pool of settlements, either by increasing density at proposed allocations or by allocating additional sites (or both). It is important to note that no new village clusters would be added under Option 2, in comparison to Option 1, as none of Option 1's omitted village clusters appear to support good/sustainable access to services.
- 9.2.12 On this basis, Option 2 is considered to perform very strongly in relation to accessibility. The option would ensure the greatest possible proportion of growth allocated to the village clusters by the GNLP would come forward at locations which support convenient and sustainable access to all key local services, and many higher tier services as well. Whilst it is recognised that services and facilities at villages that do not see growth under Option 2 could struggle to remain viable in the longer term, there can be little certainty.
- 9.2.13 Under Option 3, growth would be dispersed much more widely across the District to ensure the broadest possible range of village clusters receive some development. Whilst Option 1 proposes growth across 35 of the total 48 village clusters, Option 3 could conceivably seek to disperse growth across all clusters.
- 9.2.14 This would mean that all of the settlements with strong accessibility credentials would continue to receive some growth, but the proportion of growth delivered at these settlements *overall* would be much lower as weaker sites would also receive growth. This would fail to take full advantage of the opportunities at the most accessible settlements, whilst also directing growth to some of the most remote and least well-connected settlements in the District. There is clear potential for Option 3 to embed car dependency into new development at a large number of settlements, bringing forward the lowest proportion of growth under any of the options at well-connected settlements.
- 9.2.15 One notable example of village cluster that is not proposed any growth under Option 1, but which could well be allocated growth under Option 3 is Morley and Deopham, which is a notably rural location, distant from a main road corridor. Whilst there are no shortlisted site, one site does stand-out as being in close proximity to the primary school (site SN4027); however, the plan document explains: "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."
- 9.2.16 In **conclusion**, the Option 1 seeks to strike a balance between, on the one hand ensuring accessibility to higher order services/facilities and, on the other hand, dispersing growth so as to support the long term viability of village services and facilities. This approach has clear merit; however, on balance, it is considered that a preferable approach, in respect of Accessibility, might involve greater concentration of growth at select more accessible village clusters (Option 2), albeit the downside of Option 2 is that less accessible village clusters could see little or no growth, leading to pressure on the viability of village services/facilities and village vitality more generally. As for Option 3, this approach is not supported, and potentially gives rise to a risk of significant negative effects.

- 9.2.17 An important consideration is the matter of supporting developments at a scale that delivers 'planning gain' in the form of **new or upgraded community infrastructure**, either via direct funding or by making land available. For example, developments might support expansion of the village primary school, a new community centre, sports and play facilities, strategic green infrastructure or transport infrastructure upgrades over-and-above what is necessary to make the development acceptable in transport terms.
- 9.2.18 Few such opportunities have been identified to date; however, there will be a need to revisit this matter subsequent to the current consultation, drawing particularly upon comments received from Parish Councils. There are several preferred allocations and shortlisted omission sites that are potentially large enough to support notable planning gain, in respect of new or upgraded community infrastructure; however, on the other hand, it is a strategic objective of the Village Clusters Plan to support small sites, and small sites can tend to be supported by Parish Councils and local residents within villages.
- 9.2.19 By way of an example, a 1.4 ha site at Hales is preferred for allocation on the basis that: "The site as promoted it too large, but a more restricted site (approx. 1/3 of the land promoted) would be less intrusive in the landscape and on the setting of the listed former Hales Hospital, as well as allowing for any necessary mitigation of the 1:1000 year surface water flood risk. The site would need to be accessed via the current HAL1 allocation, which has outline consent for 20 dwellings." There is a need to question whether either A) a larger site should be allocated to include greenspace / landscaping; or B) consideration should be given to a larger housing scheme with a view to achieving planning gain, also noting that, as explained within the plan document: "The site is well located to access the limited local facilities; Hales also benefits from a continuous footway to employment and higher order services in Loddon, as well as being on the main Lowestoft/Beccles/Norwich bus route."

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

Option 1 Striking a balance	Option 2 Accessibility led	Option 3 Dispersal led
	2	2

- 9.3.1 South Norfolk's key strategic biodiversity sensitivity is in relation to the internationally designated sites associated with the Broads, which are located to the north and east of the District. This includes the Broadland Special Protection Area (SPA) and the Broads Special Area of Conservation (SAC) and Ramsar site. However, it will also be important to consider the potential for effects on three other SACs, namely the Waveney & Little Ouse Valley Fens SAC, just beyond the south western boundary of the District, the River Wensum SAC in the far north of the District and the Norfolk Valley Fens SAC, two units of which fall within the centre and west of the District. Additional sensitivity is derived from proximity to the large number of Sites of Special Scientific Interest (SSSIs) dispersed throughout the District, as well as to a network of locally designated County Wildlife Sites (CWS) plus areas of designated ancient woodland.
- 9.3.2 Option 1 generally performs strongly in relation to biodiversity. Growth would be directed to settlements which are distant from any internationally designated sites, with the notable exception of Hapton in the centre of the District. The village is in close proximity of the Flordon Common unit of the Norfolk Valley Fens SAC. Development at Hapton could therefore have some potential to adversely affect the SAC via factors such as increased recreational pressure, though the magnitude of any effects is considered likely to be low given the small size of the preferred allocation (12 homes).
- 9.3.3 Turning to national designations, the District's SSSIs are dispersed widely whilst the spatial pattern of growth under Option 1 is also relatively broad. This reduces the potential for new development to be clustered near any single SSSI. Consequently, Option 1 is considered unlikely to have potential for adverse effects on the vast majority of South Norfolk's SSSIs, with the notable potential exceptions of development at Hapton (which is near to the 'Flordon Common' SSSI, as discussed above) along with development at Ashwellthorpe and at Aslacton, which are in close proximity to the 'Lower Wood, Ashwellthorpe' SSSI and the 'Aslacton Parish Land' SSSI respectively.

- 9.3.4 It is also necessary to consider areas of designated ancient woodland, though there appears to be limited potential for harm to ancient woodland under Option 1.
- 9.3.5 In terms of local designations, the network of CWSs across the District is extensive, and development under all three options could have potential for some sensitivity to CWSs. Although none of the proposed site allocations under Option 1 are adjacent to a CWS, several are within 500m, i.e. a convenient walking distance. This could lead to increased recreational pressure, particularly at the settlements of Rockland St Mary and Ashwellthorpe, where Option 1 would deliver two sites within 500m of a CWS.
- 9.3.6 Table 9.2 serves to highlight that the preferred sites, on average, perform broadly on a par with omission sites in terms of proximity to biodiversity assets.

Table 9.2. Av	erage distanc	e to hindive	reity accete

	Average distance of preferred sites (m)	Average distance of shortlisted sites (m)	Average distance of rejected sites (m)
SAC	5600	6400	5800
SSSI	2500	3000	2500
CWS	835	890	820

- 9.3.7 Under Option 2, the overall number of CWS near which development would be delivered is lower, though the scale of development near each affected CWS would likely be higher as growth would be intensified at a smaller number of settlements under Option 2. Conversely, under Option 3 the dispersed pattern of growth would likely minimise the extent to which any single receptor is affected, though could bring a greater overall number of receptors into close proximity with new development.
- 9.3.8 There is also a need to consider the extent to which the options could contribute to achieving **biodiversity enhancements** through the development process, including a net gain in biodiversity. At a strategic scale, the emerging Greater Norwich Local Plan (GNLP) seeks to promote net gain through development, and it will be important that the Village Clusters Plan is consistent with this strategic policy context. Policy 7.4 (Village Clusters) of the GNLP requires that new development in the village clusters including development allocated by the VCHAP should deliver "enhancements to the multi-functional green infrastructure network" in order to "contribute to the strategic network". It is considered that, in order to be consistent with this requirement, development under any of the options would have theoretical potential to deliver a local biodiversity net gain whilst also contributing to wider habitat enhancement.
- 9.3.9 In conclusion, Option 1 is found to perform most strongly on the basis that it strikes a proportionate balance between dispersing potential adverse effects on designated sites across the District, thereby minimising the potential for harm at any specific receptor, whilst also avoiding harm altogether at receptors at the more remote and poorly connected settlements. Options 2 and 3 are found to perform less strongly than Option 1, though broadly on a par with one another. Under Options 2 and 3 there could potentially be a risk of growth in proximity to a sensitive receptor such that there is a risk of a significant negative effect; however, there is little reason to suggest this would be the case in practice, given the potential for careful site selection, plus site specific mitigation.

- 9.3.10 There are several instances of site boundaries being reduced in extent (from those submitted through the call for sites, which will tend to reflect land-ownership boundaries), or developable areas identified within site boundaries, to reflect landscape and flood risk concerns; however, it is not clear that biodiversity has been a significant factor. It is also notable that, in several instances, the loss of hedgerows and/or mature trees is identified as necessary to facilitate safe vehicular access.
- 9.3.11 Moving forward, it will be important to ensure that site boundaries and developable areas are set mindful of the need to facilitate achievement of **biodiversity net gain**. Whilst it is typically possible to demonstrate a biodiversity net gain at the planning application stage in cases where a site does not contain priority habitat (also mindful of boundary habitats and the role of the site in respect of ecological connectivity between nearby habitat patches), there is an important role for Local Plans in respect of maximising the biodiversity net gain opportunity, and avoiding any unforeseen issues. For example, whilst the proposal is that site specific policy for Site SN0400 at Alpington should seek to enhance the 'setting' of the veteran tree within the site boundary, a more stringent approach, from a biodiversity perspective, could potentially involve supporting onsite green infrastructure that maintains or enhances the biodiversity value of the tree.

9.4 Climate change adaptation

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

Option 1	Option 2	Option 3
Striking a balance	Accessibility led	Dispersal led
=	=	=

- 9.4.1 The key consideration in respect of climate change adaptation is the need to support the resilience of the District to the potential effects of climate change, including flooding. This means directing residential growth away from areas of greatest flood risk where possible. There is also a need to consider adaptation to other potential effects of climate change, including higher temperatures.
- 9.4.2 Looking first at fluvial flood risk, **Option 1** performs strongly in general. All proposed site allocations are mostly or entirely outside Flood Zone 3 (i.e. high risk) with the notable exception of site SN0444 in Spooner Row (15.5% in FZ3). Additionally, two proposed allocations give rise to concerns in relation to Flood Zone 2 (i.e. medium risk). Firstly, SN0390 at Earsham is around 25% within FZ2, although the proposal is not to allocate that part of the site affected by flood risk (N.B. there can be arguments for including the area at flood risk within the allocation, to ensure that it is well managed as blue/green infrastructure, and with a view to minimising downstream flood risk). Secondly, SN2036 in Wortwell is around 60% within FZ2, although the proposal is densification on an existing allocated site, outside the area of flood risk. Although these sites represent a small proportion of the total allocations proposed under Option 1 overall, their poor performance in relation to fluvial flood risk must be recognised.
- 9.4.3 Surface water flood risk is more widespread in the District, though again very few of the proposed site allocations are notably affected. It is noted that site SN3019SL at Bressingham is affected by 'low' surface water flood risk across around 65% of its area, though only 3% of the total site area is affected by 'high' risk. The proposed site allocation SN2183 at Wreningham is around 47% affected by 'low' surface water flood risk, though around 22% of the site is also affected by 'high' risk. However, at these sites it may be possible to mitigate areas of risk through measures such as Sustainable Drainage Systems (SuDS), and by incorporating areas of highest risk into open space.
- 9.4.4 Table 9.3 serves to highlight that preferred sites perform well on average relative to rejected sites, in terms of flood risk. With regards to the high average percentage intersect of shortlisted sites with fluvial flood risk zone 2, this reflects the fact that one site at Gillingham is highly constrained.

Table 9.3: Average intersect with flood risk zones

	Average intersect of preferred sites (%)	Average intersect of shortlisted sites (%)	Average intersect of rejected sites (%)
Fluvial flood zone 2	1.8	5.8	3.1
High surface water flood risk	0.9	0.5	2.8

- 9.4.5 Under **Option 2**, the narrower distribution of growth means that in general, growth will be concentrated at fewer village clusters, theoretically presenting an opportunity to avoid settlements most affected by flood risk. However, some of the settlements with best accessibility (which are the focus for growth under Option 2) are also those at which flood risk is most widespread. This reflects the fact that transport corridors tend to follow river corridors.
- 9.4.6 Of particular note, sites SN0274REVA and SN0274REVB at Gillingham are both significantly constrained by fluvial flood risk, with a majority of both sites falling within Flood Zone 3. Although excluded from Option 1, the sites would likely come into play under Option 2, given that Gillingham is very well linked to Beccles. Adverse effects under Option 2 could therefore be greater than under Option 1.
- 9.4.7 Under Option 3 the wide dispersal of housing growth could give rise to some theoretical potential for development at settlements more affected by flood risk. However, in practice it considered that where such potential exists, the low quantum of growth that would come forward at each village cluster under Option 3 could help ensure that only the least flood risk-affected sites are selected. Additionally, dispersing growth would mean that the adverse effects of concentrating growth at higher risk settlements under Option 2 would be avoided, helping Option 3 to outperform Option 2.

- 9.4.8 Turning to another key aspect to climate change adaptation, namely adapting to higher temperatures, there is little to meaningfully differentiate between the options. Development under any of the options could have potential to incorporate planting, open space and other cooling features.
- 9.4.9 In **conclusion**, Option 1 gives rise to limited concerns from a flood risk perspective, and it is also fair to assume that it would be possible to avoid problematic flood risk under Options 2 and 3. It is noted that there is tendency for the District's more accessible villages to be located along river valleys (and, in turn, transport corridors); however, in practice there would still be good potential to avoid flood risk.

9.4.10 There are several instances of **site boundaries** being reduced in extent (from those submitted through the call for sites, which will tend to reflect land-ownership boundaries), or **developable areas** identified within site boundaries, to reflect flood risk concerns. This is supported and, moving forward, there will be a need to ensure that opportunities to proactively manage flood risk are realised, potentially aligned with biodiversity net gain / local nature recovery / nature recovery network objectives. This recommendation is made mindful of the proposed revision to paragraph 157 of the NPPF, as set out within the NPPF consultation document of January 2021. The revised paragraph supports "using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management."

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.

Option 1 Striking a balance	Option 2 Accessibility led	Option 3 Dispersal led
2	\Rightarrow	3

- 9.5.1 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').
- 9.5.2 Minimising per capita emission from the **built environment** is also a national priority, for example, the Government's Ten Point Plan for a Green Industrial Revolution (2020) identifies that far-and-away the greatest opportunity for carbon savings comes from "Greener Buildings", which primarily means supporting a switchover to heating by electricity (heat pumps, potentially linked as heat networks) and/or hydrogen, and a national strategy on 'heat and buildings' is forthcoming. However, it is difficult to foresee any particular issues or opportunities to be addressed through the Village Clusters Plan:
 - In particular, it is difficult to suggest that a decision to support larger sites (e.g. up to 100 homes or more) might lead to economies of scale and densities / use mixes supportive of heat networks.
 - Another consideration is an approach to site selection (e.g. support for larger sites) supportive of strategic renewable power generation, e.g. a solar farm, wind turbine(s) or hydropower; however, again, this is unlikely to be a significant consideration in the context of the Village Clusters Plan.
 - In respect of supporting achievement of high standards energy efficiency and onsite renewable power generation (typically rooftop solar PV) that exceed the requirements of buildings regulations and meet or exceed emerging policy requirements, there is a need to support sites with strong development viability, which can tend to mean larger sites, although this matter is not clear cut.
 - One further important consideration is distributing growth and allocating sites mindful of electricity grid constraints and opportunity (including opportunities around delivering new battery storage), 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 (in particular wind), and that strains may be particularly acute in rural areas.

- 9.5.3 In **conclusion**, as per the conclusions reached above (under 'Accessibility') and below (under 'Transport'), Option 1 performs fairly well, but Option 2 potentially performs better, whilst Option 3 performs poorly. This conclusion reflects an understanding that the primary climate change mitigation consideration, in the context of the Village Clusters Plan, is per capita emissions from transport. It is also the case that greater concentration of growth under Option 2 could feasibly lead to a degree of opportunity in respect of minimising per capita emissions from the built environment, although this is highly uncertain, recalling that large-scale schemes are outside the scope of the Village Clusters Plan.
- 9.5.4 With regards to the significance of effects, it is appropriate to identify the likelihood of significant negative effects under all of the options considered. Whilst, on the one hand, climate change mitigation is a global issue, such that local actions can only have a limited effect, on the other hand, there is 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) and, 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]

9.5.5 There is limited potential to comment on emerging policies, over-and-above comments made above (under 'Accessibility') and below (under 'Transport'). The Council should be alive to the possibility of supporting one or more **larger sites** so as to support transport infrastructure upgrades and/or measures supportive of minimising per capita built environment CO₂ emissions; however, in practice, allocation of sites of a scale whereby opportunities arise is likely to be outside of the scope of the Village Clusters Plan.

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.

Option 1 Striking a balance	Option 2 Accessibility led	Option 3 Dispersal led
		2

- 9.6.1 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.
- 9.6.2 As has been discussed, there are few instances of preferred sites (**Option 1**) having been identified on the basis that they will deliver planning gain, e.g. in the form of new or upgraded community infrastructure. A notable exception is the emerging preferred approach to growth at Barnham Broom, where a larger site is supported (45 homes), despite being associated with landscape and other sensitivities, because development will serve to "realign Bell Road to create a better junction arrangement with Mill Road/Norwich Road, and also to create a focal point for the settlement, close to the post office stores and pub". Also of note is the preferred site at Bressingham (SN4036; Land to the east of School Road), where a 2.09 ha site is allocated to deliver 40 homes. The site justification text explains: "A larger site area is proposed to be retained as the site includes proposed parking for the school, and also needs to protect the setting of the adjoining listed building, which is expected to require the provision of a large area of open space." It is anticipated that further opportunities for planning gain will be suggested through the current consultation; however, there will be a need to balance the desire to realise such opportunities with the objective of allocating smaller sites through the Village Clusters Plan.
- 9.6.3 One other important Communities related consideration is vehicular, cyclist and pedestrian safety. There are numerous instances of sites being rejected on the basis of there being no footway along the road leading to the site; however, there are also several instances of sites being preferred for allocation despite there being not footway. Notably:

- Seething site SN2148 (Land to the west of Mill Lane; 12 homes) the plan document explains: "Although at the edge of the village, the site is less than 1km from the local services and facilities; Mill Lane has no footways, but wide verges, and there are footways on the main Brooke Road (although some upgrades may be required)." The site is also notable for containing a small waste-water treatment plant, which could potentially give rise to an issue in respect of odour.
- Little Melton site SN4052 (Land south of School Lane and east of Manor Farm Barns; 25 homes) the plan document explains: "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."
- Aslacton site SN0459 (Land off Church Road; 25 homes) does not benefit from footway access; however, there is an expectation is that development will serve to deliver a footpath extension (and the site is notable for being in very close proximity to the local primary school).
- 9.6.4 Under **Option 2** it is difficult to suggest that there would be notably greater potential to deliver planning gain, as the emphasis would still be on allocating smaller sites, as opposed to larger sites (which are outside the scope of the Village Clusters Plan). Whilst there could be the possibility of two or more nearby allocations pooling funds to deliver targeted new infrastructure, this can prove challenging in practice.
- 9.6.5 Under Option 3, there is again little potential to add to the discussion presented above, under Accessibility. On the subject of safe access and safe walking/cycling, it is fair to say that there could be additional pressure to allocate one or more sites that are sub-optimal, or associated with a degree of risk. For example, whilst there are no preferred sites at the Thurton and Ashby St Mary cluster under Option 1, there could be pressure to allocate growth under Option 2, which could give rise to a tension in respect of safe vehicular access onto the A146, which is designated as a Principle Route.
- 9.6.6 In **conclusion**, it is appropriate to flag a slight concern with Option 3 on the basis that there could be a need to consider allocation of one or more sites that are problematic in terms of safe access. There are also certain question-marks regarding safe pedestrian access under Option 1; however, on balance significant concerns are not raised, noting that this matter has been examined in detail, and given that it will no doubt be given further detailed consideration during and subsequent to the current consultation.

9.6.7 As discussed, a key issue will be to ensure that safe vehicular and pedestrian/cyclist access can be achieved at all allocations. There will be a need to engage closely with site owners/developers, given potential viability implications.

9.7 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	Option 2	Option 3
Striking a balance	Accessibility led	Dispersal led
=	=	=

- 9.7.1 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.

- 9.7.2 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.
- 9.7.3 The strongest argument is potentially for dispersing growth (Option 3) 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.
- 9.7.4 In **conclusion**, it is not possible to differentiate between the alternatives with any confidence.

9.7.5 There would appear to be little potential to address Economy issues/opportunities through policy in the Village Clusters Plan.

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.

Option 1 Striking a balance	Option 2 Accessibility led	Option 3 Dispersal led
\nearrow		2

9.8.1 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. Table 9.4 serves to highlight that preferred sites may tend to be slightly closer to a conservation area and/or a Grade I listed building than rejected sites; however, this is unsurprising given support for preferred sites in more accessible locations.

Table 9.4: Average intersect with flood risk zones

	Average distance of preferred sites (m)	Average distance of shortlisted sites (m)	Average distance of rejected sites (m)
Conservation area	1440	1216	1560
Grade I listed building	975	870	1280
Grade II* listed building	1230	1150	1180
Grade II listed building	175	1380	180

- 9.8.2 A number of preferred sites are in close proximity to heritage assets; for example, at each of the following villages one preferred site either intersects or is located within 50m of a conservation area: Bawburgh, Brockdish, Brooke, Geldeston, Hempnall, Mulbarton, Pulham Market, Winfarthing. Also, Seething is notable in that three preferred sites intersect the conservation area (albeit two are very small sites proposed as Settlement Limit extensions). However, where there is a heritage constraint this is invariably recognised within the 'reasoned justification' text, with a view to ensuring that the matter is suitably addressed through site specific policy. By way of example:
 - Geldeston the reasoned justification text for the preferred site (SN0437; Land off Kells Way; 20 homes) explains: "The site has a good relationship with the existing built form of the settlement and would benefit from good connectivity... Whilst the site adjoins the Conservation Area, any impacts could be mitigated against through careful design and layout. It has been acknowledged that this site has a better relationship with the Valley setting due to existing boundaries."

- Hempnall the reasons justification for the preferred site (SN1015, Land adjacent to the primary school, The Street; 20 homes) explains: "The site benefits from good connectivity and relates well to the existing built form of the settlement. The site is relatively open to the north with a PRoW to the north east site boundary, where development should be lower density to maintain some through views and to reduce the impact on the character of the Conservation Area and setting of the Listed Buildings. Off-site highway works have been identified however these are considered to be achievable. Development would also need to address change in levels across the site." Hempnall is notable for having seen two significant modern schemes extend the village beyond the conservation area; also, the northern extent of the preferred site is notable for breaking a field boundary, hence there could potentially be an argument for exploring a more modest allocation, from a heritage perspective.
- Bressingham the reasoned justification text for the preferred site (SN4036; Land to the east of School Road; 40 homes) explains: "A larger site area is proposed to be retained as the site includes proposed parking for the school, and also needs to protect the setting of the adjoining listed building, which is expected to require the provision of a large area of open space."
- 9.8.3 Other notable case-study locations for growth under Option 1 are:
 - Barnham Broom site options are clustered in a part of the village where there is a low density of
 designated heritage assets, but both the allocation (SN4051; 45 homes) and the two preferred
 Settlement Limit Extensions are described as being in close proximity to non-designated heritage
 assets. Also, two of the three shortlisted sites (SN0174 and SN0196) are notable for encroaching on
 the Yare Valley and an associated listed mill building.
 - Bawburgh is notable as a historic village on the River Yare in close proximity to Norwich (although this stretch of the river is not accessible), with a high concentration of listed buildings and large conservation area spanning the river. The preferred site (SN4053, 45 homes) abuts the conservation area, but there appears to be something of a buffer between the site and the main historic core, and development would infill a gap between the main village and an outlier cluster of homes. It is also notable that the preferred site greatly reduced in extent in comparison to the submitted site, which wrapped around the entirety of the southern village edge. As such, from a heritage perspective, there is a need to question whether there could be merit to a more comprehensive, masterplanned approach to growth, which could feasibly deliver additional landscaping or greenspace to protect the setting of the conservation area and/or river valley. It is noted that the plan document sets out that: "A landscape assessment would be required to determine the landscape impact of development in this location."
- 9.8.4 Under **Option 2** there is little reason to suggest that additional growth at better connected / more accessible villages could lead to increased pressure on the historic environment, although there may be something of a correlation between conservation areas / historic assets and river valley and, in turn, transport corridors. Under **Option 3**, however, it is fair to highlight a concern that added pressure to allocate at each and every village cluster could lead to a situation whereby sites currently not preferred (i.e. either shortlisted or rejected) on heritage grounds need to come into contention for allocation. For example, there could be pressure to support growth at one or more of the following village clusters where there is no growth proposed under Option 1:
 - Carelton Rode whilst there are no shortlisted omission sites, one site that could conceivably come into contention for allocation under Option 3 is SN2086, in respect of which the reasoned justification text within the plan document explains: "The site is well contained and relates well to existing development however it is situated within key views of designated heritage assets, including the Grade I listed Church to the north, and development would have a detrimental impact on the setting of these buildings. Surface water flooding within part of the site and highways concerns have also been identified."
 - Kettingham two of the four rejected sites are constrained by heritage assets. The reasoned
 justification text for site SN0528: "There is a Grade II listed war memorial located to the site's frontage
 where a Planning Inspector has considered that the development of the site would fail to preserve or
 enhance the setting, and thereby the significance of, the designated heritage asset."

9.8.5 In conclusion, Option 1 performs reasonably well. Historic environment constraint has clearly been a major focus of the site selection process; however, there remains risk of historic environment impacts, given a desire to support new housing in accessible locations well located to exiting built form. There will be very good potential to avoid and mitigate impacts through site specific policy, taking account of consultation responses received (including from Historic England). Option 2 would not necessarily give rise to additional concerns. Under Option 3 there would be a risk of pressure to allocate sites that are subject to historic environment constraint, although there is little reason to suggest the likelihood of significant negative effects, recalling the modest scale of sites.

Commentary on emerging policies

9.8.6 As discussed, a key issue will be to ensure that policy is in place to avoid or sufficiently mitigate historic environment impacts, where it is the case that a preferred site is in close proximity to a historic environment asset, located within a conservation area or otherwise known to be located in an area of historic environment sensitivity. This could necessitate open space and/or landscaping within site boundaries, and could have implications for design and access arrangements. There will be a need to engage closely with site owners/developers, given potential viability implications.

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.

Option 1 Striking a balance	Option 2 Accessibility led	Option 3 Dispersal led
2	3	\Rightarrow

- 9.9.1 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". The target of 1,200 new homes is therefore pre-determined and it is assumed that each of the three options will deliver this as a minimum.
- 9.9.2 On this basis, there is no opportunity to differentiate between the options on the basis of overall quantum of growth. However, there is also a need to consider the extent to which the options support timely delivery of a good housing mix, including affordable housing, and the extent to which the benefits of new homes will be distributed across the District.
- 9.9.3 Looking first at housing mix, the emerging GNLP requires all development proposals for ten or more dwellings to provide at least 33% on-site affordable housing and a mixture of housing sizes, types and tenures. Under **Option 1**, all allocations would be expected to deliver the set quota of affordable housing, plus there is support for numerous Settlement Limit expansions, suited to smaller schemes that, whilst no likely to deliver affordable housing, would be well suited to self-build schemes.
- 9.9.4 However, having said this, there is also a need to question whether larger schemes are more likely to benefit from economies of scale, leading to strong viability and, in turn, greater potential to deliver the full quota of affordable housing. Village clusters where preferred sites have a capacity at or below 15 homes are: Kirby Cane and Ellingham; Needham, Brockdish, Starston and Wortwell; Tharston, Hapton and Flordon; and Tivetshall St Mary and Tivetshall St Margaret. Small sites of this scale are likely to be suited to delivery by a wide range of SME housebuilders, and hence are unlikely to face delivery delays, but there could be risks around ensuring a good mix of housing onsite, including affordable housing.
- 9.9.5 In terms of the distribution of new housing, Option 1 performs well as it would deliver growth at 35 village clusters spread widely across the District. This would help ensure that the benefits associated with new housing are not concentrated narrowly by being clustered at a small number of locations. Such benefits can include helping to sustain the vitality of rural settlements and enabling people with a local connection to remain living locally at settlements with few available housing options.

- 9.9.6 Turning to **Option 2**, it is apparent that by concentrating growth at fewer settlements the pattern of effects in relation to housing is likely to be quite different. Focussing new development at a smaller number of settlements inevitably means that either larger or more densely developed schemes will be required, or that additional allocations will be required. In instances where adding an additional site could enable the delivery of a larger, coherent scheme then this could theoretically facilitate greater opportunities for delivery of the broadest range of housing types and tenures. However, it is challenging to predict this with any certainty, and in many settlements there may not be opportunities to select omission sites which offer this kind of potential for combining delivery with another site.
- 9.9.7 Under Option 2, if additional delivery at the most accessible settlements were achieved via several additional individual sites being allocated, then there would be no strategic benefit to concentrating growth at fewer settlements, and there may not necessarily be a greater delivery of affordable housing at a district-wide scale. Simultaneously, the benefits of housing growth would be focussed narrowly, with the majority of village clusters missing out on any benefits from plan-led growth.
- 9.9.8 Conversely, under **Option 3** the benefits of growth would be spread as widely as possible across the District, with housing delivery being achieved in most or all of the 48 village clusters. Assuming a focus on delivering (and not unduly exceeding) the 1,200 home GNLP target, and assuming a roughly equal distribution of homes between the 48 village clusters, Option 3 could potentially involve one or more allocations for around 25 homes at each village cluster. This level of growth would still have a good chance of achieving a range of housing types and tenures, although there would be increased prevalence of smaller sites at some risk of not delivering the full quota of affordable housing.
- 9.9.9 In **conclusion**, Option 1 performs well on the basis that it would achieve an appropriate mix of housing types and tenures, dispersed widely across the District. In the context of the Village Clusters Plan, which is premised on the basis of delivering the benefits of sustainable growth at smaller settlements, this is a sound basis for strong performance. The wider dispersal proposed under Option 3 is found to perform even more strongly, as the benefits of new housing would be felt by the broadest possible range of communities in the District, albeit there would be increased prevalence of smaller sites at some risk of not delivering the full quota of affordable housing. Conversely, Option 2 is found to perform most poorly in relation to housing by limiting the dispersal of growth to the fewest village clusters.
- 9.9.10 It is fair to conclude that the differential effects are significant, given that meeting rural housing needs is an identified key issue for South Norfolk. 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. Furthermore, 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.

- 9.9.11 First and foremost, there is a need to consider emerging Policy SNVC3 Housing Mix. The key point to note is that the policy will be finalised in light of a new Strategic Housing Market Assessment (SHMA), which is currently in preparation. Also, it is anticipated that the policy will be supportive of Neighbourhood Plans setting specific local requirements in respect of housing mix. In addition to affordable housing, a key matter for consideration is support for bungalows suited to older occupants, thereby enabling older people to downsize locally (thereby freeing-up larger properties for families).
- 9.9.12 Another consideration is the possibility of supporting **larger sites**, with a view to securing a proportion of onsite 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, such as development falling under planning use class C2 (residential institutions).

9.10 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	Option 2	Option 3
Striking a balance	Accessibility led	Dispersal led
=	=	=

- 9.10.1 The key considerations in relation to land and soils are the need to make the best use of available land by directing growth away from areas of 'best and most versatile' agricultural land (where poorer quality land is available) and the need to avoid sterilising or obstructing winnable minerals deposits.
- 9.10.2 It is therefore notable that the national 'provisional' agricultural land classification (ALC) database suggests that much of South Norfolk is underlain by Grade 3 land. Land classified as Grade 3 is only considered to be best and most versatile (BMV) if it is found to be 3a, with land found to be 3b considered of poorer quality. This detailed sub-division has not been undertaken at a national scale, and it is therefore to be assumed that where there is an absence of detailed survey data, Grade 3 land should be considered to have potential to be BMV.
- 9.10.3 With very few exceptions, all three of the alternatives would primarily involve loss of Grade 3 land, hence there is limited potential to meaningfully differentiate between the alternatives. However, it is possible to identify some specific points of difference in relation to **Grade 2 agricultural land**:
 - Option 1 growth is proposed at several settlements underlain by Grade 2 land, namely Barnham Broom, Burgh St Peter, Gillingham and Rockland St Mary. Growth under Option 1 would take around 5ha of Grade 2 land out of productive agricultural use.
 - Option 2 the most notable consideration is the potential for an increased focus of growth at Rockland St Mary, as a relatively well-connected settlement underlain by Grade 2 agricultural land.
 - Option 3 the wider dispersal of growth would see development come forward at a greater number of village clusters underlain by high grade BMV land not featured under the first two options. Overall, this is likely to mean that Option 3 would have potential to lead to loss of Grade 2 land.
- 9.10.4 In light of the above, there is some reason to suggest that Option 2 performs most strongly in relation to agricultural land, because it would minimise the overall extent of the highest quality land which is taken out of productive use; however, this is highly uncertain.
- 9.10.5 Making best use of available land can also mean directing growth to previously developed land (where available) to minimise land take at greenfield land. Generally, previously developed land is associated with larger settlements where changes to land use over time can see brownfield opportunities become available within existing built areas at locations such as former industrial land which has become redundant or via estate regeneration. However, the rural nature of many of the village clusters reduces the potential for widespread brownfield opportunities as the land use profile in many rural settlements tends neither to include large former-industrial opportunity sites nor estate regeneration opportunities.
- 9.10.6 The performance of the options in relation to previously developed land should be seen in this context. Under Option 1, it is notable that growth would come forward at Bergh Apton which includes one of the few significant available brownfield sites in the village clusters, namely the former concrete works on Church Road (site SN0412REV). This is a clear positive, on the basis that not only would development of the site make a positive contribution to the village street scene, it would also help avoid unnecessary allocation of a greenfield site at the settlement edge. Elsewhere, all other growth under Option 1 would come forward at greenfield sites.
- 9.10.7 Whilst this generally reflects the absence of available brownfield land, it is notable that Option 1 would include growth at the Aslacton, Great Moulton and Tibenham village clusters which does not make best of use of a large brownfield site. Specifically, the allocation of site SN0459 at Aslacton is proposed under Option 1, whilst the former meat processing plant (SN2003) at Great Moulton is omitted. This undermines the performance of Option 1 in relation to land and soils to an extent.

- 9.10.8 Under Option 2, growth would be focussed at a smaller number of village clusters, suggesting that whilst the overall number of settlements which receive greenfield allocations would be lower, the extent of greenfield land take at those settlements which do receive growth could be greater. However, there could be some limited potential for additional housing delivery under Option 2 to come forward at brownfield sites. For example, under Option 2, Bressingham would likely see a greater quantum of development, where there is a large brownfield omission site (SN3010; Wyevale Garden Centre).
- 9.10.9 Under Option 3, growth would be dispersed much more widely and to a larger number of village clusters which do not have any available brownfield site options. Although the scale of growth at each village cluster is assumed to be relatively low under Option 3 and the size of sites required to deliver this growth would be correspondingly limited, Option 3 is considered to perform poorly by virtue of its potential to develop the greatest number and widest dispersal of greenfield sites.
- 9.10.10 Turning to the issue of minerals, there does not appear to be potential for significant effects on any identified minerals deposits or extraction sites under any of the options. In South Norfolk, the emerging Norfolk Minerals and Waste Local Plan Review identifies new or expanded minerals extraction sites at (or near) Earsham, Haddiscoe, Heckingham, Mundham and Swardeston. None of these identified extraction sites appear to give rise to potential conflicts with growth proposed under any of the options.
- 9.10.11 In **conclusion**, whilst it is challenging to differentiate with confidence. There is some reason to suggest that Option 2 could serve to minimise loss of best and most versatile agricultural land, the differences could be fairly marginal. There is also a concern in respect of making fullest use of brownfield land under Option 1; however, this is a site-specific consideration, subject to change. With regards to the significance of effects, taking a precautionary approach it is appropriate to 'flag' a risk of significant loss of best and most versatile agricultural land under all alternatives, although there is uncertainty in the absence of detailed survey work.⁹

Commentary on emerging policies

- 9.10.12 There is often limited potential to mitigate loss of agricultural land through site-specific policy, as undeveloped land within site boundaries will tend to be taken out of agricultural use and instead given over to green infrastructure. Also, where site boundaries are reduced in extent, to exclude an area of agricultural land, there is a need to consider whether the land excluded from the site boundary will continue to be productively used for agricultural, where there is a hope value of future development.
- 9.10.13 Another consideration is site specific policy aimed at making best use of **brownfield** land. One site of note is SN0412 at Bergh Apton, which is the site of a former concrete works. Here it is recognised that there will be significant site remediation and clean-up costs, which will impact on site viability, and hence could necessitate a (modestly) higher density scheme.

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.

Option 1 Striking a balance	Option 2 Accessibility led	Option 3 Dispersal led
	2	2

9.11.1 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, though 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.

⁹ Natural England guidance (gov.uk/government/publications/agricultural-land-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.

- 9.11.2 Turning first to impacts on the National Park, the areas of potential sensitivity within the District are concentrated in the north east, where the Park's boundaries partially extend into South Norfolk. In this respect, **Option 1** performs strongly, directing only a small proportion of growth to settlements with potential sensitivity in relation to the Park and its setting. Of these, sites at Rockland St Mary (SN0531), Gillingham (SN0478) and Kirby Cane (SN0305 and SN3018) stand out as being in close proximity to the Park or located the National Park side of their respective settlement, i.e. without the screening effect that the existing built area provides. All other proposed allocations under Option 1 appear to have little or no sensitivity to the National Park on the basis that their location is well screened by existing built form.
- 9.11.3 Examining these four highlighted proposed allocations more closely, it is apparent that sites at Rockland St Mary and Kirby Cane appear to relate well to the existing settlement form and would be unlikely to impart an urbanising or otherwise harmful influence over the setting of the Park. However, site SN0478 at Gillingham appears to have potential for some adverse effects in relation to the Park, as it is large in scale, departs notably from the existing settlement pattern and has clear sightlines through to the National Park, around 200m to the south. Having said this, there is a need to consider that the site would be seen in the context of the current Local Plan allocation, immediately to the north, which is under construction.
- 9.11.4 Moving on to South Norfolk's local landscape designations, Option 1 generally performs strongly. None of the proposed allocations have any sensitivity in relation to the designated Strategic Gaps between Norwich, Hethersett and Wymondham, and the majority of proposed allocations having no sensitivity in relation to the Norwich Southern Bypass Landscape Protection Zone (NSBLPZ) or the long range viewing cones to Norwich. However, there are two notable exceptions with regard to the NSBLPZ, as Option 1 proposes allocation of SN4053 at Bawburgh and SN4052 at Little Melton, both of which are entirely within the designated area. 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".
- 9.11.5 The other key local landscape designations are the three designated River Valleys of the Yare/Tud in the far north of the District, the Yare/Tas at the Norwich southern fringe/along the A140 corridor to Long Stratton, and the Waveney along the District's southern and eastern boundary. Whilst the River Valleys are not necessarily a constraint to development, Policy DM4.5 of the DM Policies Document explains that development proposals must demonstrate how they protect "the distinctive characteristics, special qualities and geographical extents" of the River Valleys to avoid harm to their landscape character. Option 1 proposes allocation of ten sites which are 95%-100% within the River Valleys, and as such there could be some theoretical potential for localised erosion of distinctive characteristics or special qualities. In practice, the majority of these proposed allocations relate well to the existing settlement and are unlikely to protrude harmfully beyond the existing built area; however, SN0348 at Kirby Cane appears to be an exception to this as it extends the built form of the settlement into the open countryside.
- 9.11.6 In terms of protecting the existing gaps within and between village clusters, and thereby preserving the individual character of the District's rural settlements, Option 1 performs strongly as it does not give rise to concerns in respect of settlement coalescence. In respect of local landscape sensitivities, one site of note is the preferred site at Wicklewood (SN0577REVA and REVB; Land to the south of Wicklewood Primary School; 30 homes), for which the reasoned justification text explains: "The site is in a prominent location within the local landscape however with careful design it could enhance the gateway to the village. A Design Brief may be required for this site ensure appropriate design."
- 9.11.7 Under **Option 2**, whereby development is directed to a smaller number of the best-connected village clusters, it is notable that several settlements with the greatest landscape sensitivity are among those likely to be a focus for growth. Notably, this includes Ditchingham, where at a settlement-wide scale there is sensitivity in relation to both the Broads National Park and the Waveney designated River Valley. Under Option 2, Rockland St Mary would also have potential to receive additional growth, potentially increasing the magnitude of effects in relation to the setting of the Park. Additional growth at Scole would also be very likely under Option 2 and it is therefore of note that the majority of the settlement also falls within the Waveney River Valley. Intensified growth at Scole could potentially urbanise the setting and character of the River Valley.

- 9.11.8 Additionally, it is considered Option 2 could potentially include focussing higher growth at Little Melton on the basis that the settlement could support sustainable access to current and planned services at Hethersett. On this basis, the cumulative effect of higher growth at Little Melton along with the planned northern expansion of Hethersett via existing allocations could have potential to erode the settlement gap between the two settlements. This could undermine the individual character of each, leading to localised adverse landscape effects.
- 9.11.9 Effects under **Option 3** would be more widespread, but generally of lower magnitude. This is because Option 3's dispersed pattern of growth would bring forward development at a much broader range of settlements, many of which have local and/or strategic landscape sensitivity. However, by its nature the dispersal option is unlikely to concentrate substantial growth at any one site or settlement, and therefore the magnitude of effects is judged likely to be less-than-significant.
- 9.11.10 By way of an example, Keswick and Intwood is one notable village cluster that is not assigned any growth under Option 1, but which could potentially see growth under Option 3. There are no shortlisted omission sites; however, it seems likely that the two rejected sites feasibly in contention for allocation at Keswick both give rise to a degree of landscape concern, given the location of Keswick between the River Yare and the A46. The reasoned justification text for rejected site SN4081 explains: "The site is located within the Strategic gap and the Norwich Southern Bypass Landscape Protection Zone which seeks to retain the openness of the zone and where possible enhance the landscape setting of the southern bypass. In addition, the site is located adjacent to a County Wildlife site 'Carr Wood' where development would have a detrimental impact on landscape which may not be reasonably mitigated."
- 9.11.11 One further village cluster that is not assigned any growth under Option 1, but which could potentially see growth under Option 3, is Barford, Marlingford, Colton and Wramplingham. Here there is only one shortlisted site (SN0552), which is a very large site, although the current plan document identifies the potential to deliver a scheme of up to 50 homes on part of the site, in conjunction with provision of significant public open space. The reasoned justification text explains: "A site of reduced size would be more appropriate however it would continue to have an adverse landscape impact and due to the identified flood risk constraints on those parts of the site closest to the existing settlement new development would have a poor relationship with the main village."
- 9.11.12 In conclusion, Option 1 is found to perform most strongly in relation to landscape. This is on the basis that it would deliver a pattern of growth such that effects are minimised in relation to the Broads National Park, whilst growth would also be largely directed to locations with limited or no potential for harm to local designations. Whilst there are a very small number of individual exceptions to this general finding, it is considered that growth under Options 2 and 3 would have greater potential for adverse effects overall. For Option 2, this is on the basis that a higher concentration of growth would come forward at settlements with strategic or local landscape sensitivity. Under Option 3, greater potential for adverse effects is anticipated via the dispersal of development to a greater number of village clusters with heightened landscape sensitivity. On balance, it is considered that Options 2 and 3 perform broadly on a par with one another, though more poorly than Option 1.
- 9.11.13 Significant effects are not anticipated under any of the options, given seemingly limited potential for impacts to a designated landscape, or a landscape unit that is otherwise known to be of particular importance locally (i.e. at the district-scale). Furthermore, the plan's focus on small sites should mean that there is often good potential for mitigation of landscape impacts through screening and landscaping.

Commentary on emerging policies

9.11.14 There are several instances of **site boundaries** being reduced in extent (from those submitted through the call for sites, which will tend to reflect land-ownership boundaries), or **developable areas** identified within site boundaries, to reflect landscape concerns. This is often to be supported, from a landscape perspective. For example, at Wreningham, the reasoned justification text for site SN2183 (Land south of Wymondham Road; 25 homes) explains: "The size of the site is out of scale and character with the village as promoted, 2.1ha (52 dwellings) however, a reduced site area would relate to the existing settlement and read as part of the existing built form. It could be frontage development possibly with a small cul-desac to mirror the development on the opposite side of the road. It could be contained by substantial planting to the west so that it would not encroach significantly into the countryside to the south..."

- 9.11.15 However, there is a need to consider the possibility of land excluded from the site/developable area coming under pressure for development in the longer term, e.g. through a future review of the Village Clusters Plan. This being the case, there can be arguments for comprehensive planning from the outset, with a view to securing environmental and infrastructure benefits that might be missed through a more piecemeal approach over time.
- 9.11.16 For example, the preferred site at Earsham (SN0218, Land north of The Street; 35 homes) comprises roughly half of a single field, which has been promoted for development in its entirety. As such, there is a need to question whether the preferable approach, from a landscape perspective, could be to allocate the site in its entirety (either through the Village Clusters Plan or a future Local Plan), so as to ensure delivery of open space and landscaping, as opposed to leaving open the possibility of the non-allocated half of the field coming under pressure for development in the future; also noting Earsham's position in the Waveney Valley, in close proximity to the Broads.

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.

Option 1	Option 2	Option 3
Striking a balance	Accessibility led	Dispersal led
2		3

- 9.12.1 The transport SA theme seeks to recognise and prioritise the use of sustainable modes of transport where possible, particularly in relation to connecting new housing with existing services and facilities. Therefore, there are strong synergies between the transport SA theme and the accessibility SA theme, suggesting the pattern of likely effects in relation to both themes is likely to similar.
- 9.12.2 First, it is important to recognise that the nature of many of the village clusters means that many do not support a wide range of local services, meaning residents will need to travel to meet many needs. Option 1 performs reasonably well in this regard, as growth would largely be directed to settlements at which it is possible to access some local services by sustainable modes of transport.
- 9.12.3 In terms of public transport connections, there are relatively few village clusters well served by fast, frequent and convenient bus services to the higher tier settlements which serve the District. The key larger settlements serving South Norfolk are: Diss in the south of the district; Harleston, Bungay and Beccles in the east (the latter two of which are in the neighbouring authority area); Long Stratton in the centre; Wymondham and Hethersett in the north west; and Loddon and Poringland in the north east. At the Norwich fringe, transport links to services in the Norwich built area are important.
- 9.12.4 This focusses attention at village clusters in the District which benefit from the strongest public transport linkages with the above service centres, summarised below:
 - · Best links with Diss: Bressingham, Dickleburgh and Scole
 - Best links with Harleston: Needham
 - Best links with Bungay: Ditchingham and Earsham
 - Best links with Beccles: Gillingham
 - · Best links with Loddon: Hales
 - Best links with Wymondham: Spooner Row
- 9.12.5 It is recognised that more limited bus routes do serve many of the other village clusters. However, the above list represents settlements where timetable information indicates there are the most frequent and therefore most convenient services. In instances where bus routes exist but the number of services is limited, it is considered that public transport is unlikely to represent a convenient alternative to a private vehicle. Option 1 therefore performs generally well, allocating growth at all of the above settlements with strong public transport connections.

- 9.12.6 Recognising that it will not be possible to deliver the full housing target exclusively at settlements which support convenient public transport connectivity, there is also a need to consider which village clusters could support growth from which local services can be accessed via walking and cycling.
- 9.12.7 In this regard, Option 1 continues to perform reasonably well, directing growth to a number of village clusters with a good range of local services to which walking and cycling access is possible. Village clusters which benefit from the widest range of local services (i.e. at least a primary school, GP surgery, village shop and a pub) include Hemphall, Mulbarton, Pulham Market and Rockland St Mary. As noted under the accessibility theme, Option 1 collectively proposes a significant focus of growth across these village clusters, suggesting strong performance in transport terms.
- 9.12.8 Under **Option 2**, growth would be concentrated at village clusters from which the widest range of services and facilities can be accessed by convenient and sustainable modes of travel, particularly walking, cycling and public transport. A greater quantum of housing would be delivered at settlements found to support best accessibility. In practice, this is likely to mean that the greatest proportion of development would be delivered at locations with the very best public transport connectivity. However, as fast and frequent public transport is only available at a small number of the village clusters, Option 2 is likely to also focus growth at village clusters where schools, healthcare shops and pubs can be accessed by walking and cycling. On this basis, Option 2 is considered to perform very strongly in relation to accessibility. The option would ensure the greatest possible proportion of growth would come forward at locations which support walking, cycling and public transport access to all key local services, and many higher tier services as well.
- 9.12.9 Under **Option 3**, growth would be dispersed much more widely across the District. The remote, rural nature of some of the village clusters omitted from Options 1 and 2 would mean that Option 3 directs the greatest proportion of development to locations which embed car dependency for access to most or all services. On this basis, Option 3 is found to perform most poorly overall.
- 9.12.10 In conclusion, Option 1 performs well as it gives a degree of weight to supporting those locations with greatest potential for trips to be made by walking, cycling and public transport; however, an alternative approach that performs better can be envisaged, namely Option 2. Under Option 2 there would be fewer trips by car, thereby giving rise to lower risk of problematic traffic congestion, as well as fewer emissions from transport, both greenhouse gasses that contribute to climate change, and air pollutants that impact directly on human health. In this light, Option 3 performs relatively poorly, although it is important to recognise that increased growth at rural village clusters that are poorly connected in transport terms could serve to support local services/facilities (e.g. the local primary school), thereby avoiding a situation whereby local services/facilities are lost and existing residents need to travel further by car to access equivalent services/facilities elsewhere.
- 9.12.11 With regards to effect significance, it is not clear that there is a reason to predict a likelihood of significant negative effects under Option 3; however, there will be a need to revisit this conclusion in light of consultation responses and further work, e.g. in respect of capacity of junctions and rural lanes.

Commentary on emerging policies

9.12.12 There are several instances of **site boundaries** being reduced in extent (from those submitted through the call for sites, which will tend to reflect land-ownership boundaries), or **developable areas** identified within site boundaries, to ensure good access. Equally, there are instances of sites and/or developable areas being selected with a view to supporting road infrastructure upgrades; notably, a larger site (SN4051; 45 homes) is supported at Barnham Broom in order to deliver a necessary junction improvement in the centre of the village. Walking and cycling links are also a consideration, but there is the potential for further work to ensure that opportunities are fully realised, e.g. supporting larger sites suited to delivering new **walking/cycling infrastructure** upgrades.

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.

Option 1	Option 2 Accessibility led	Option 3 Dispersal led
Striking a balance	=	=

- 9.13.1 The key considerations in relation to water are the need to minimise pressure on the District's water resources, whilst also maintaining and enhancing the quality of the District's waterbodies.
- 9.13.2 Looking first at water quality, the Greater Norwich Water Cycle Study (WCS, 2020) finds that four of the water recycling centres (WRCs) serving the District have "no available permitted headroom" once projected growth across the GNLP area is accounted for. This finding is based on a number of assumptions, not least the scale of growth to be delivered through the Village Clusters Plan; however, the fact that the WRCs at Ditchingham, Long Stratton, Whitlingham Trowse and Wymondham have no identified capacity is potentially significant, as many village clusters fall within the catchments of these WRCs. Therefore, whilst the overall scale of growth to be delivered through the Village Clusters Plan is included in the assumptions of the WCS, it may be that the precise nature of effects could change depending on how that growth is distributed within the District.
- 9.13.3 It is particularly noteworthy that among the WRCs where headroom capacity is most constrained is Ditchingham, as the settlement would likely be a focus of growth under both Option 1 and, in particular, under Option 2. Similarly, the settlement of Rockland St Mary would likely be a focus for growth under both Option 1 and potentially Option 2. It is therefore notable that the settlement falls within the catchment of the constrained Whitlingham Trowse WRC, though the strategic scale of Whitlingham Trowse (i.e. it serves the majority of the Norwich urban area) suggests that additional growth at Rockland St Mary in isolation would have limited impact on overall headroom capacity. Of the remaining two constrained WRCs, Wymondham appears unlikely to receive additional wastewater flows from growth under Options 1 and Option 2, whilst Long Stratton WRC could see some additional flows from growth under Option 1.
- 9.13.4 By contrast, the wide dispersal of growth under Option 3 would deliver growth at settlements which drain to all of the constrained WRCs. However, it is important to view this in its full context, as the absolute quantum of new development draining to the constrained WRCs would likely be very low, potentially in the tens of units. Given that headroom capacity at the district-wide scale appears relatively robust and it is just individual WRCs at which there are capacity concerns, the measurable effect of low levels of growth at individual sites is likely to be negligible overall.
- 9.13.5 In respect of potable water resources, South Norfolk's potable water supplies are provided by Anglian Water, whose supply area falls within an area classed by the Environment Agency as being in 'serious water stress'. Despite this, Anglian Water's 2019 Water Resources Management Plan (WRMP) notes that measures have been implemented which will ensure that "adequate water supplies will be available up to 2045" and will be sufficient for the proposed level of growth across the supply area, including South Norfolk. Therefore, it is considered that there is no opportunity to meaningfully differentiate between the options in relation to potable water.
- 9.13.6 A final consideration is the need to ensure that water which flows through the plan area, particularly to the highly sensitive wetlands associated with **the Broads**, is not adversely affected by growth proposed through the VCHAP. The vast majority of the District falls within the Broadland Rivers management catchment within the wider Anglian river basin District. Growth under all three of the options would therefore come forward within the same catchment area, suggesting that the potential downstream effects under each of the options would be broadly on a par. Separately, it is noted that the majority of the District falls within a Nitrate Vulnerable Zone (NVZ), indicating that there is a risk to water bodies from nitrate pollution. However as the NVZ affects nearly all of the District, there is no opportunity to differentiate between the performance of the options in relation to nitrates pollution.
- 9.13.7 In conclusion, Option 1 does not give rise to significant concerns, and the two alternatives (Options 2 and 3) are judged to perform broadly on a par.

Commentary on emerging policies

9.13.8 Wastewater and surface water drainage considerations have fed into the process of determining site boundaries, developable areas and densities; for example, in respect of SN0149 at Thurlton, the plan document explains: "Drainage requirements and retention of trees to the south will determine density."

There will be the potential for further work subsequent to the current consultation, taking account of consultation responses received, including from Anglian Water and the Environment Agency.

10 Summary and conclusions

10.1.1 This Interim SA Report is focused on the appraisal of the following three broad distribution alternatives:

Option	Name	Description
1	Striking a balance	Broadly consistent with the emerging preferred approach, the aim is to strike a balance between the objective of supporting growth in more accessible locations on the one hand, and dispersing growth widely across the District on the other.
2	Accessibility led	Assumes allocations / growth only at the more accessible village clusters.
3	Dispersal led	Assumes a dispersal of growth across all village clusters.

- 10.1.2 The specific sites that would deliver Option 1 are known, as this is the emerging preferred approach, whilst the specific sites that would deliver Options 2 and 3 are not known. The appraisal has sought to make cautious assumptions about the specific sites that would deliver Options 1 and 3; however, at the same time, the appraisal has not sought to focus overly on site-specifics. As discussed in Section 8, an aim of the appraisal at this stage is to focus on matters of broad distribution as much if not more so than matters relating to detailed site selection, in the knowledge that detailed site selection is subject to change.
- 10.1.3 Having made these introductory remarks, appraisal conclusions are presented in the table below.

Table 10.1: Broad distribution alternatives - summary appraisal findings

Topic	Option 1 Striking a balance	Option 2 Accessibility led	Option 3 Dispersal led
Accessibility	2	1	3
Biodiversity	***	2	À
Climate change adaptation	=	=	=
Climate change mitigation	2	\bigstar	3
Communities	***		2
Economy	=	=	=
Historic environment	7		2
Housing	2	3	\bigstar
Land and soils	=	=	=
Landscape	\uparrow	2	2
Transport	2		3
Water	=	=	=

Part 2

- 10.1.4 From the table 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 to reflect the strategic objective 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.
- 10.1.5 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 because they "are often built-out relatively quickly") and the emerging GNLP (paragraph 381; including because smaller sites are suited to delivery by 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 linked topics.
- 10.1.6 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, and which may tend to be associated with a degree of relative environmental sensitivity.
- 10.1.7 Finally, beyond examining the merits of three alternative approaches to distribution / allocation (one being the emerging preferred option), the appraisal examines the emerging preferred approach to **site-specific policy**. As part of this, there has been a particular focus on the emerging preferred approach to amending site boundaries and identifying developable areas within site boundaries, with it often being the case that smaller developments are supported, when there is land available to potentially support a larger scheme. There are often good arguments for supporting smaller schemes, for example in terms of landscape and access, and it is a stated objective of the Village Clusters Plan to support smaller schemes; however, there is a need to avoid the risk of piecemeal growth in the long term, which can lead to opportunities missed in respect of comprehensive planning and the realisation of infrastructure and environmental benefits. It is recommended that there should be a focus on allocating well contained sites as far as possible, which typically means allocating whole fields contained by existing boundaries.
- 10.1.8 These appraisal findings are published for consultation at the current time, in order to inform the consultation, and will be taken into account by the Council alongside consultation responses received when finalising the plan for publication and submission. SNDC officers have also taken the opportunity to present a response to the appraisal findings at the current time see **Box 10.1**.

Box 10.1: SNDC officers' initial response to the appraisal

The appraisal summary above is noted, in particular the headline conclusion in respect of arguments for a more 'accessibility led' approach to dispersing growth. The preferred allocations have been selected aiming to strike a balance between directing growth to more accessible locations whilst also dispersing growth widely between village clusters in order to meet locally arising housing needs and wider objectives; however, this is a difficult balance to strike, and there will be a need to re-examine matters subsequent to the current consultation, taking account of consultation responses received and any other new evidence that may arise.

The appraisal finding in respect of comprehensive planning for sites is also noted, and the Council will be receptive to views on the potential benefits that might accrue through support for larger schemes. However, allocation of larger schemes will often be outside the scope of the Village Clusters Plan. There must necessarily be a focus on smaller sites, given the total number of homes to be delivered through the plan (at least 1,200) and the stated objectives of the Plan in respect of supporting small sites and dispersing growth widely. These 'top down' considerations, combined with the fact that there are relatively few small site options that are self-contained parcels of land (e.g. given the typical size of agricultural fields in the District), means that there is often a need to explore allocation of parts of agricultural fields, often with new hedgerow boundaries created.

Part 3: What are the next steps?

Part 3 42

11 Plan finalisation

11.1 Proposed Submission Plan

- 1.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. The proposed submission plan will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim IIA Report, responses to the current consultation and further appraisal work.
- 1.1.2 The SA Report will be published alongside the Proposed Submission Plan. It will provide all of the information required by the SEA Regulations 2004.

11.2 Submission, examination and adoption

- 1.1.3 Once the period for representations on the Proposed Submission Plan / SA Report 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 statement setting out the main issues raised during the consultation. The SA Report will also be submitted.
- 1.1.4 At Examination the Inspector will consider representations (alongside the SA Report) before then either reporting back on the Plan's soundness or identifying the need for modifications. If there is a need for modifications these will be prepared and then subjected to consultation, alongside SA if necessary.
- 1.1.5 Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of adoption a 'Statement' must published that explains the 'story' of plan-making / SA and sets out 'the measures decided concerning monitoring'.

12 Monitoring

- 1.1.6 The SA Report must present 'measures envisaged concerning monitoring'.
- 1.1.7 At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on matters relating to delivering planning gain, including biodiversity net gain; however, there will be a need to revisit monitoring measures at the next stage, once more detail is known in respect of site-specific proposals.

Part 3 43

Appendix I: The SA scope

Introduction

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

The aim of this appendix is to introduce the SA scope by setting out key issues under the SA framework.

Accessibility

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

Key issues:

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

Biodiversity

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

Key issues:

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

Climate change adaptation

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

Key issues:

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

Climate change mitigation

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

Key issues:

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

Communities

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

Key issues:

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

Economy

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

Key issues:

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

Historic environment

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

Key issues:

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

Housing

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

Key issues:

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

Land and soils

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

Key issues:

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

Landscape

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

Key issues:

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

Transport

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

Key issues:

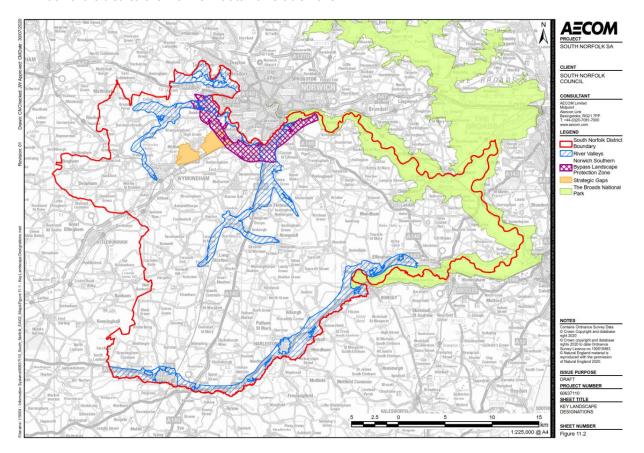
- The plan area is reasonably well connected to mainline railway network and the strategic road network, though there are no motorways in the district.
- Car dependency is high in relation to the regional and national averages, reflecting South Norfolk's rural context and dispersed settlement pattern.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

Water

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

Key issues:

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



An example map from the Scoping Report, showing landscape designations

Appendix II: Site options GIS analysis

Introduction

The aim of this appendix is to present GIS analysis of all site options. As discussed in Section 5, this was one element of work that fed into the establishment of reasonable alternatives for appraisal.

Methodology

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

Given available data it has been possible to meaningfully differentiate the site options in respect of 19 measures. Each measure is discussed in turn below, and then each is assigned a column in Table A, which aims to communicate the performance of each site option in respect of each measure.

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

Approach to RAG shading

The general approach taken is to assign a RAG shading on the basis of relative performance, i.e. a RAG shading is applied to any given site on the basis of how it *ranks relative to other sites*. This is easily done using the "conditional formatting" function in Excel. However, established distance thresholds are also applied where appropriate, i.e. where the distance threshold is: A) suitably robust / agreed; and B) helpful, in that the effect is to helpfully differentiate sites. The approach to RAG shading is discussed further below.

Limitations

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

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

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

Potential for further work

There is potential for further work to: explore the merits of sites in respect of additional measures; and analyse the spread of data in respect of any given measure in further detail, e.g. using maps and histograms, and by comparing and contrasting the performance of sub-sets of site options, e.g. sites at Settlement A versus sites at Settlement B. There is also the potential to prepare site specific proformas, to expand on the analysis presented in each row within Table A (e.g. reporting precise performance against each of the measures). The approach taken below is a light touch analysis, with the aim of relative brevity, but comments are welcome on proportionate additional work.

Findings of the analysis

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

Agricultural land

Of the 452 site options, 49 intersect grade 2 agricultural land and are assigned red in Table A.

379 sites intersect grade 3 land area assigned amber, whilst the remaining 24 sites are assigned green.

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

Special Protection Area (SPA)

400m is an established distance threshold, as an easy walking distance; however, only 7 of the 452 site options are within this distance. Furthermore, there are other distance thresholds that can and often are used, as broad rules of thumb when giving consideration to the potential for recreational pressure. As such, it is considered appropriate to assign **red** shading to the 17 site options within 1,000m, as a round number and a distance that is quite easily walkable for many people, for example dog walkers.

305 site options are beyond 10km from an SPA, at which distance it is fair to assume that proximity to an SPA is a non-issue. These sites are assigned **green**.

The remaining 130 site options are shaded on a red-amber-green scale on the basis of relative distance.

Special Area of Conservation (SAC)

400m is an established distance threshold, as an easy walking distance; however, only 8 of the 452 site options are within this distance. Furthermore, there are other distance thresholds that can and often are used, as broad rules of thumb when giving consideration to the potential for recreational pressure. As such, it is considered appropriate to assign **red** shading to the 20 site options within 1,000m, as a round number and a distance that is quite easily walkable for many people, for example dog walkers.

64 site options are beyond 10km from an SAC, at which distance it is fair to assume that proximity to an SAC is a non-issue. These sites are assigned **green**.

The remaining 368 site options are shaded on a red-amber-green scale on the basis of relative distance.

Site of Special Scientific Interest (SSSI)

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

26 site options are beyond 5km from a SSSI, at which distance it is fair to assume that proximity to an SSSI is a non-issue. These sites are assigned **green**.

The remaining 382 site options are shaded on a red-amber-green scale on the basis of relative distance.

County Wildlife Site (CWS)

20 site options are within 50m, at which distance it is fair to highlight proximity to a CWS as a potentially significant constraint, taking a precautionary approach. These sites are shaded **red** in Table A.

135 site options are beyond 1km from a CWS, at which distance it is fair to assume that proximity to an CWS is a non-issue. These sites are assigned **green**.

The remaining 297 site options are shaded on a red-amber-green scale on the basis of relative distance.

GP Surgery

Whilst it is difficult to identify a distance threshold that represents poor performance, in the context of a large rural area, on balance it is considered fair to highlight the 25 site options that are beyond 5km as performing poorly. These sites are shaded **red** in Table A.

Equally, it is difficult to judge a distance threshold below which sites can be judged as performing well, but on balance it is considered fair to highlight the 63 site options that are less than 1km distant as performing well. These sites are assigned green.

The remaining 322 site options are shaded on a red-amber-green scale on the basis of relative distance.

Primary school

Whilst it is difficult to identify a distance threshold that represents poor performance, in the context of a large rural area, on balance it is considered fair to highlight the 69 site options that are beyond 2km as performing poorly. These sites are shaded **red** in Table A.

130 site options are within 400m, which is a relatively easy walking distance for many people. These sites are shaded **green** in Table A.

The remaining 252 site options are shaded on a red-amber-green scale on the basis of relative distance.

Secondary school

Whilst it is difficult to identify a distance threshold that represents poor performance, in the context of a large rural area, on balance it is considered fair to highlight the 30 site options that are beyond 7.5km as performing poorly. These sites are shaded **red** in Table A.

Equally, it is difficult to judge a distance threshold below which sites can be judged as performing well, but on balance it is considered fair to highlight the 41 site options that are less than 2km distant as performing well. These sites are assigned green.

The remaining 381 site options are shaded on a red-amber-green scale on the basis of relative distance.

Town or village centre

Whilst it is difficult to identify a distance threshold that represents poor performance, in the context of a large rural area, on balance it is considered fair to highlight the 39 site options that are beyond 7.5km as performing poorly. These sites are shaded **red** in Table A.

Equally, it is difficult to judge a distance threshold below which sites can be judged as performing well, but on balance it is considered fair to highlight the 24 site options that are less than 2km distant as performing well. These sites are assigned green.

The remaining 389 site options are shaded on a red-amber-green scale on the basis of relative distance.

Settlement Limit

Whilst there is an argument for highlighting all sites not directly abutting a Settlement Limit as performing poorly, there is a large number of such sites. As such, and on balance, it is considered appropriate to highlight the 73 site options beyond 400m (an easy walking distance) as performing poorly. These sites are shaded **red** in Table A.

What is more clear cut is that the 26 sites within or directly abutting a Settlement Limit perform well. These sites are assigned green.

The remaining 153 site options are shaded on a red-amber-green scale on the basis of relative distance.

Flood zone 2

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

405 site options do not intersect either flood zone 2, and are shaded green in Table A.

The remaining 24 sites are shaded on a red-amber-green scale on the basis of relative percentage intersect.

Surface water flood risk (low)

73 site options intersect the low surface water flood risk zone by more than 20%. These sites are shaded red.

199 site options do not intersect the low surface water flood risk zone and are shaded green.

The remaining 177 sites are shaded on a red-amber-green scale on the basis of relative percentage intersect.

Conservation area

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

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

The remaining 204 site options are shaded on a red-amber-green scale on the basis of relative distance.

Grade 1 listed building

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

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

The remaining 339 site options are shaded on a red-amber-green scale on the basis of relative distance.

Grade 2* listed building

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

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

The remaining 218 site options are shaded on a red-amber-green scale on the basis of relative distance.

Grade 2 listed building

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

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

The remaining 205 site options are shaded on a red-amber-green scale on the basis of relative distance.

Designated River Valley

81 site options are within or directly abut a designated River Valley, and are assigned red in Table A.

It is difficult to confidently highlight sites in close proximity as constrained; however, taking a precautionary approach, it is fair to highlight the 40 site options within 500m as potentially constrained. These sites are assigned amber in Table A, whilst the remaining 331 sites are assigned green.

Norwich Southern Bypass landscape Protection Zone

17 site options are within or directly abut the protection zone, and are assigned red in Table A.

It is difficult to confidently highlight sites in close proximity as constrained; however, taking a precautionary approach, it is fair to highlight the 12 site options within 500m as potentially constrained. These sites are assigned amber in Table A, whilst the remaining 423 sites are assigned green.

Designated view cone

25 site options are within or directly abut the protection zone, and are assigned **red** in Table A. The remaining 427 sites are assigned **green**.

Summary analysis

The table below presents an analysis of all site options, grouped by location.

Additionally, within the first column:

- Preferred sites are shaded dark green
- · Shortlisted sites are shaded light green
- Site options at villages where allocations will be made through a Neighbourhood Plan are shaded grey

A note on accessibility

Whilst it is recognised that the colour variations within the right hand columns of Table A are quite subtle, use of a colour scale is considered preferable to the alternative approach of using just three colours (red, amber and green). Furthermore, a colour scale is considered appropriate recalling that the aim is not to enable differentiation of the 'overall sustainability' of sites (e.g. to answer the question: *How sustainable is site SN0433REV at Alpington in comparison to site SN0400?*). Rather, the aim is to inform more targeted comparison, e.g. to answer the questions: "How do sites at Alpington compare to one another, and to other site options district-wide, in respect of proximity to a GP surgery?". The approach taken, which involves use of a colour scale in place of simply using amber, is well suited to answering these questions.

Table A: Summary GIS analysis of site options

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN4011	South & West Church Road	Alburgh	1.0																			
SN4031SL	Site Adj 1 Station Road	Alburgh	0.2																			
SN4003	East Of Common Road	Aldeby	0.7																			
SN0014SL	Land At Rushleys	Aldeby	0.1																			
SN0433REV	Land In Wheel Road (south Site)	Alpington	3.2																			
SN0400	Land At Church Meadow	Alpington	1.9																			
SN0434	Land On Wheel Road (north Site)	Alpington	1.2																			
SN1012	Mill Field, Mill Road	Alpington	0.9																			
SN0435	Land In Burgate Road	Alpington	0.7																			
SN0529SL	Land Off Nicholson Road	Alpington	0.4																			
SN0585SL	Land Opp Hall Farm Barn & Hilltop B	Ashby St Mary	0.4																			
SN4038	Land South Mill Road	Ashby St Mary	3.9																			
SN4040	Land West Mill Common	Ashby St Mary	1.9																			
SN4039	Land Off Mill Road	Ashby St Mary	1.0																			
SN0598REV	Land East Of New Road	Ashwellthorpe	1.2																			
SN0239	Land At New Road	Ashwellthorpe	0.7																			
SN0242	Land To West Of New Rd	Ashwellthorpe	0.7																			
SN0233	Rose Farm, The Street	Ashwellthorpe	0.5																			
SN0234REV	Land Adj Rose Farm, The Street	Ashwellthorpe	0.5																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN0236SL	Land Rear Of 47 The Street	Ashwellthorpe	0.5																			
SN0213SL	Timber Yard, The Street	Ashwellthorpe	0.3																			
SN0013SLREV	Land West Of New Rd	Ashwellthorpe	0.2																			
SN0597SL	Land West Of New Road	Ashwellthorpe	0.2																			
SN0017SL	Land On West Side Of New Rd	Ashwellthorpe	0.2																			
SN1042	Land At Church Road	Aslacton	3.9																			
SN2005	West Of Woodrow Lane	Aslacton	2.5																			
SN0459	Land Off Church Road	Aslacton	1.6																			
SN1041	Adj Pottergate Street	Aslacton	1.5																			
SN2118	South Of Sneath Road	Aslacton	0.5																			
SN3001SL	North Of Sneath Road	Aslacton	0.2																			
SN0552	Land Off Watton Road	Barford	37.4																			
SN0416	Land Off Barnham Broom Road	Barford	1.5																			
SN1013REV	Church Lane	Barford	0.6																			
SN0196	Land West Of Mill View	Barnham Broom	2.1																			
SN0174	Land Off Bell Road	Barnham Broom	2.0																			
SN4051	Land Corner Bell & Norwich Rds	Barnham Broom	1.4																			
SN0055	Land East Spur Rd & South Norwich R	Barnham Broom	1.0																			
SN0324	Land South West Of Norwich Road	Barnham Broom	0.9																			
SN2110SLREV	South Of Norwich Road	Barnham Broom	0.4																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN0018SL	Land North Norwich Road	Barnham Broom	0.2																			
SN4087SL	Land South Bell Road	Barnham Broome	0.4																			
SN0484REV	Land East Stocks Hill	Bawburgh	13.6																			
SN3032	West Of Harts Lane	Bawburgh	3.0																			
SN4071	Land East Of Harts Lane	Bawburgh	2.0																			
SN4053	Land East Stocks Hill	Bawburgh	1.1																			
SN0015SL	New Road	Bawburgh	0.4																			
SN0002SL	Land At The Brambles, Stocks Hill	Bawburgh	0.2																			
SN0210	Church Wood, Welbeck Road	Bergh Apton	2.4																			
SN2117	Adj To Village Hall	Bergh Apton	1.8																			
SN0412REV	Former Concrete Works , Church Rd	Bergh Apton	1.7																			
SN0203	Land South Of Church Road	Bergh Apton	0.9																			
SN4030	Land Rear Mill Farm Mill Road	Bergh Apton	0.6																			
SN0533	East Of The Street	Bergh Apton	0.6																			
SN2023SL	Bergh Apton House, Loddon Road	Bergh Apton	0.4																			
SN2022SL	The Dell, Sunnyside	Bergh Apton	0.3																			
SN2015SL	Town Farm	Bergh Apton	0.3																			
SN0122SL	Site At Cookes Road	Bergh Apton	0.2																			
SN0007SL	Town Farm	Bergh Apton	0.2																			
SN0299	Land West Of Long Lane	Bracon Ash	2.2																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN0549	Barracks Meadow	Bracon Ash	1.8																			
SN2087	South Of Cuckoofield Le/east Of The St	Bracon Ash	1.7																			
SN4032	Land East Norwich Road	Bracon Ash	1.6																			
SN0195	Land Off B1113 Norwich Road	Bracon Ash	0.5																			
SN0026SL	Jasmine Cottage, The Street	Bracon Ash	0.3																			
SN0366REV	The Street	Bramerton	8.0																			
SN3037	North Of Low Road	Bressingham	6.2																			
SN2054	East Of School Road	Bressingham	3.5																			
SN3038	South Of High Road	Bressingham	2.3																			
SN3010	Wyevale Garden Centre	Bressingham	2.2																			
SN4036	Land East School Road	Bressingham	2.1																			
SN3036	South Of Low Road	Bressingham	1.9																			
SN4037	Land South Fersfield Road	Bressingham	1.3																			
SN2057	North Of A1066	Bressingham	1.2																			
SN2079	Fersfield Road/Folly Lane	Bressingham	0.9																			
SN4026	Land East Of Common Road	Bressingham	0.8																			
SN3020	West Of School Road	Bressingham	0.7																			
SN4033	Land Rear 34 Common Road	Bressingham	0.5																			
SN3019SL	West Of School Road	Bressingham	0.5																			
SN3023	South Of Darrow Lane	Bressingham	0.3																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN0385	Church Road	Brockdish	1.7																			
SN0464	Land Off Mill Road, Thorpe Abbotts	Brockdish	0.6																			
SN4069SL	Land South Scole Road	Brockdish	0.2																			
SN0583	Land North Laurel Farm The Street	Brooke	6.7																			
SN0432REVA ¹⁰	East Of Norwich Road	Brooke	4.7																			
SN2122	East Of Wood Farm	Brooke	2.7																			
SN4047	Brooke Flock Farm The Street	Brooke	2.0																			
SN2119	North Of High Green	Brooke	1.9																			
SN0490	Land Off Mereside	Brooke	1.6																			
SN0432REVB ¹¹	Land At Norwich Road	Brooke	1.2																			
SN0584	Land West Of Burgess Way	Brooke	0.8																			
SN0077SL	The Field, Howe Lane	Brooke	0.4																			
SN4065SL	The Stables, Land Adj High Green/Honeypo	Brooke	0.4																			
SN0020SL	43 High Green	Brooke	0.2																			
SN0579SL	Waldor Cottage, High Green	Brooke	0.2																			
SN0346	Land North Of Old Yarmouth Road	Broome	1.8																			
SN0410REV	Old Yarmouth Road	Broome	1.1																			
SN4049	Land West Yarmouth Road	Broome	0.9																			

¹⁰ Excludes SN2018 ¹¹ Excludes SN0432REV

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN4020	West Of Yarmouth Rd (opp Bridge House)	Broome	0.9																			
SN4021	South East Of Loddon Road & Sun Road	Broome	0.8																			
SN4044SL	Land Rear 126 Yarmouth Road	Broome	0.1																			
SN3004SL	Rear Of 130 Yarmouth Road	Broome	0.1		ı																	
SN0009	Church Farm, Church Lane	Bunwell	6.1																			
SN0538REV	Land Opposite Lilac Farm, Bunwell St	Bunwell	1.1																			
SN0537	Land North Of Bunwell Street	Bunwell	1.0																			
SN0539	Lilac Farm	Bunwell	0.8																			
SN2126	Adjacent 114 Bunwell Street	Bunwell	0.5																			
SN2004SL	South Of Church Lane	Bunwell	0.2																			
SN0001SL	Land Between Coldstream & Burnlea	Bunwell	0.1																			
SN4010	South Of Beccles Road	Burgh St Peter	1.0																			
SN4016	Land East Of Mill Road	Burgh St Peter	1.0																			
SN4014	East Common Rd & South Beecles Rd	Burgh St Peter	0.9																			
SN4015 (SL)	Land West Of Mill Road	Burgh St Peter	0.9																			
SN4017	Land North Of Staithe Road	Burgh St Peter	0.6																			
SN0386	Land At Rectory Road	Burston	2.4																			
SN0349	Land West Of Gissing Road	Burston	1.5																			
SN0560	Land At Diss Road North Of Willow End	Burston	1.5																			
SN0561	Land At Diss Road West Of Willow End	Burston	0.9																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN0562	Land At Diss Road (east Of Hill Farmhouse	Burston	0.8																			
SN1028SL	Land Est Of Mill Road	Burston	0.3																			
SN0005SL	Holly House, Diss Road	Burston	0.1																			
SN0532	Land East Of Norwich Road	Caistor St Edmund	0.5																			
SN4068	Land South Flaxlands Road	Carleton Rode	1.3																			
SN0547	Carleton Barn, Rode Lane	Carleton Rode	1.2																			
SN4067	Land West Greenways Lane	Carleton Rode	1.1																			
SN2086	South Of Flaxlands Road	Carleton Rode	0.7																			
SN4080	Carleton Barn, Rode Lane	Carleton Rode	0.7																			
SN4009	West Of Rode Lane	Carleton Rode	0.7																			
SN0438	Land South Of Flaxlands Road	Carleton Rode	0.5																			
SN0439SL	Land West Of Rode Lane	Carleton Rode	0.2																			
SN0530	Land West Of Church Road	Claxton	1.8																			
SN0193	Land Surrounding Upland Farm	Denton	5.8																			
SN0168	North Of Upland Terrace, Norwich Rd	Denton	3.2																			
SN4035	Land North Wymondham Road	Deopham	0.6																			
SN2145	West Of Norwich Road	Dickleburgh	6.1																			
SN0516	Land Off Norwich Road	Dickleburgh	5.2																			
SN0257	Land North 87-149 Rectory Road	Dickleburgh	4.3																			
SN0217	Land Adj Bridge Farm	Dickleburgh	3.9																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN0389	Harvey Lane	Dickleburgh	3.3																			
SN0256	Land North 43-85 Rectory Road	Dickleburgh	2.8																			
SN0199	Land North Of Rectory Road	Dickleburgh	2.5																			
SN0258	Land South Of Rectory Road	Dickleburgh	1.9																			
SN3017	North Of Harvey Lane	Dickleburgh	1.5																			
SN0259	Land South Of Rectory Road	Dickleburgh	1.5																			
SN0063	Land South Harvey Lane/Langmere Rd	Dickleburgh	1.2																			
SN0498REV	Land East Ipswich Rd/north Commo	Dickleburgh	1.1																			
SN0350	Land West Ipswich Road	Dickleburgh	1.0																			
SN0230R	Land Opp Bridge Farm Norwich Rd	Dickleburgh	8.0																			
SN2083	West Of Norwich Road	Dickleburgh	8.0																			
SN4057	Land West Of Ipswich Road	Dickleburgh	0.7																			
SN4056SL	Land East Ipswich Road	Dickleburgh	0.6																			
SN0361	Off Ipswich Road	Dickleburgh	0.6																			
SN4043SL	Allotment Gardens Site, Brandreth C	Dickleburgh	0.4																			
SN4070SL	Land Side/rear Kings Head, The St	Dickleburgh	0.3																			
SN2084SL	West Of Norwich Road	Dickleburgh	0.2																			
SN0373	Thwaite Road/Tunneys Lane	Ditchingham	5.5																			
SN0345	Land North Of Loddon Road	Ditchingham	1.6																			
SN0078	Land Off Loddon Road	Ditchingham	0.7																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN0343	Land Adj Wildflower Way	Ditchingham	0.7																			
SN0205SL	Land North West Scudamore Place	Ditchingham	0.4																			
SN2011SL	Lamberts Way	Ditchingham	0.4																			
SN0218	Land West Of Earsham Village	Earsham	3.5																			
SN0390	East Of School Lane	Earsham	2.7																			
SN1037	The Old Nursery, The Drift	East Carleton	2.8																			
SN0247	Site Off Low Common	East Carleton	1.3																			
SN2167REV	East Of Hethersett Road	East Carleton	1.2																			
SN4086	Land South Rectory Road	East Carleton	1.2																			
SN2165REV	Land East Of Hethersett Road	East Carleton	1.1																			
SN0428	Land Off Rectory Road	East Carleton	0.6																			
SN1058	Wymondham Road	East Carleton	0.6																			
SN2152REVA	East Of Hethersett Road	East Carleton	0.5																			
SN1059SL	Swardeston Lane	East Carleton	0.3																			
SN4018	Land West Of Church Road	Ellingham	1.7						l													
SN0305	Land South Of Mill Road	Ellingham	1.2																			
SN4054	Land Adj 123 Yarmouth Road	Ellingham	0.8																			
SN0304	South East Corner Ellingham Island	Ellingham	0.5																			
SN3018	West Of Florence Way	Ellingham	0.5																			
SN0303	South West Corner Henrys Field Mill Lan	Ellingham	0.4																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN0306SL	Land Adj South Lodge Old Yarmouth Rd	Ellingham	0.3																			
SN4002SL	Ottos Wood, Lockhart Road	Ellingham	0.3																			
SN2053	Adjoining Pond Farm	Fersfield	2.1																			
SN2056	Fersfield Common	Fersfield	1.8																			
SN2052	West Of The Street	Fersfield	0.8																			
SN0566	Land At The Street	Flordon	1.1																			
SN2147SL	East Of Greenways	Flordon	0.4																			
SN1002	Forncett St Peter	Forncett	21.3																			
SN0089	Land South Of Common Road	Forncett	3.9																			
SN1040	Land At Mill Road/Overwood Ln/Gilderswoo	Forncett	0.5																			
SN1039SL	Kilamay Farm, Wash Lane	Forncett	0.4																			
SN0086	Land North Common Road	Forncett End	1.0																			
SN2013	Black Barn, Tabernacle Lane	Forncett End	1.0																			
SN0599R	Four Seasons Nursery, St Mary	Forncett St Mary	2.2																			
SN2028	Low Road	Forncett St Mary	1.5																			
SN0559	Land Nth Four Seasons Cheneys La	Forncett St Mary	0.9																			
SN0429SL	Land Off Spicers Lane	Forncett St Mary	0.3																			
SN0094	Land North Norwich Road (B1113)	Forncett St Peter	1.1																			
SN2058	Tawny Farm, Forncett St Peter	Forncett St Peter	1.0																			
SN0598REV	Land East New Road	Fundehall	1.2																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN0013SLREV	Land West New Road	Fundenhall	0.2																			
SN0437	Land Off Kells Way	Geldeston	8.0																			
SN0207S	Land At Old Yarmouth Rd/Geldeston Hill	Geldeston	0.4																			
SN1004SL	Allotment Gardens	Geldeston	0.3																			
SN0274REVA	Land South A143 & A146 Roundabout	Gillingham	1.2																			
SN0478	Land South Of GIL1 The Street	Gillingham	0.9																			
SN0274REVB	Land South A143 & A146 Roundabout	Gillingham	0.9																			
SN0021SL	South West Of Norwich Road	Gillingham	0.7																			
SN0208SL	Land At Common Road	Gissing	0.3																			
SN0014	Turnpike Field	Great Melton	1.8																			
SN0555	Land Off Old Road Adj Hallowing Ln	Great Moulton	1.6																			
SN2003	Former Meat Processing Plant	Great Moulton	0.6																			
SN0557SL	Site Betwn Ketts Fm & Orchard Fm	Great Moulton	0.4																			
SN0554	Land At Hallowing Lane	Great Moulton	0.4																			
SN2008SL	Overwood Lane	Great Moulton	0.3																			
SN2068	Cherry Tree Farm	Greatt Moulton	0.9																			
SN0414	Haddiscoe Manor Farm	Haddiscoe	7.1																			
SN0392	Land At Junc A143 & B1136	Haddiscoe	0.9																			
SN0308	Land Off Briar Lane, West Hales	Hales	3.1																			
SN4048SL	Land North The Street	Hapton	0.5																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN0147	Land Around Alburgh Rd & Silver Green	Hempnall	13.2																			
SN1018	Land South Of Millfields	Hempnall	2.8																			
SN2081	West Of Field Lane	Hempnall	2.4																			
SN1015	Land Adj Primary School, The Street	Hempnall	1.7																			
SN2046	Corner Alburgh Road & Lundy Green	Hempnall	1.5																			
SN1016	Busseys Loke	Hempnall	1.4																			
SN4083	Land Opp The Bungalow Bungay Road	Hempnall	1.1																			
SN1017	Broaden Lane	Hempnall	0.9																			
SN0580	Land At Home Farm, Alburgh Road	Hempnall	0.9																			
SN0220SL	Land At Millfields	Hempnall	0.5																			
SN0178SL	Land Adj Tween Oaks, Alburgh Road	Hempnall	0.4																			
SN4081	Land Off Intwood Road (Keswick)	Intwood	3.3																			
SN2014	Intwood Road	Keswick	1.1																			
SN0012SL	Land North Eaton Gate, Low Road	Keswick	0.2																			
SN0528	Ketteringham High Street	Ketteringham	1.9																			
SN0473	Land At Church Road	Ketteringham	0.9																			
SN0513	Land Noth Of High Street	Ketteringham	0.6																			
SN3031	Cantley Lane	Ketteringham/Keswick	2.9																			
SN0344	Land East Of Church Road	Kirby Cane	1.7																			
SN0396	South Of New Gate Lane	Kirby Cane	0.8																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN0348	Land Osuth Of Old Yarmouth Road	Kirby Cane	0.6																			
SN0019SL	Site Of Old Post Office Lane	Kirby Cane	0.2																			
SN2174	East Of Kirstead Green	Kirstead	0.8																			
SN4004	West Of Kirstead Green	Kirstead	0.8																			
SN0340	Land Between Watton Rd Green Ln & S	Little Melton	43.2																			
SN2044	Braymeadow Lane	Little Melton	16.2																			
SN0488	Land North School Lane	Little Melton	3.3																			
SN0182REVA	North Mill Rd, Sth Gt Melton Rd	Little Melton	3.2																			
SN0397	Mill Road	Little Melton	2.9																			
SN3001	South Of Gt Melton Road	Little Melton	2.1																			
SN0477R	East Burnthouse Rd, Sth School Ln	Little Melton	2.0																			
SN4052	Land South School Lane	Little Melton	1.3																			
SN0591	Land North Of School Lane	Little Melton	1.0																			
SN0454	Beckhithe Site, Little Melton Road	Little Melton	8.0																			
SN1046REV	Land North Of Great Melton	Little Melton	0.7																			
SN3007SL	7 School Lane	Little Melton	0.3																			
SN4058SL	Land West Burnthouse Lane	Little Melton	0.2																			
SN4072SL	Land West Burnthouse Lane	Little Melton	0.1																			
SN0474	Land West Of Colton Road	Marlingford	12.8																			
SN0475REVB	Ld East Highhouse Farm Ln Colton	Marlingford	1.0																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN0425	Land Off Mill Road	Marlingford	0.9																			
SN0475REVA	Ld Sth Colton & East Highhouse F	Marlingford	0.8																			
SN0424SL	Land Off Marlingford Close	Marlingford	0.4																			
SN0476R	North Of BB Golf Club	Marlingford & Colton	23.7																			
SN1033	Land Adj Attleborough Rd/Hill Rd	Morley	0.9																			
SN0356REV	Land East Golf Links Road	Morley	0.9																			
SN3012SLREV	Fir Grove, Deopham Road	Morley	0.5																			
SN0130SL	Land East Brecon Lodge, Golf Links Rd	Morley	0.3																			
SN4027	Stone Brigg/Deopham Road	Morley St Botolph	1.6																			
SN4041	Land East Hill Road	Morley St Peter	3.7																			
SN4042	Land North Norwich Rd & West Golf	Morley St Peter	3.5																			
SN4073SL	Paddock West Clearview Hookwood	Morley St Peter	0.2																			
SN0315	Land To East Of Mulbarton	Mulbarton	130.3																			
SN2038	North Of The Rosery	Mulbarton	14.7																			
SN4059	Corner Brick Kiln Ln & The Rosery	Mulbarton	8.2																			
SN0496REV	Land East & West Norwich Road	Mulbarton	7.1																			
SN2039	North Of Rectory Road	Mulbarton	4.7																			
SN2065REV	North High Rd & Harmans Ln	Needham	1.0																			
SN0156REVA	Site Opp Village Hall, High Road	Needham	0.9																			
SN0156	Site Opp Village Hall High Road	Needham	0.7																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN4025	Land Off Grove Way	Newton Flotman	1.5																			
SN0594	Lowlands, Ipswich Road	Newton Flotman	1.4																			
SN4024	South Of Alan Avenue	Newton Flotman	1.1																			
SN0309	Land South Loddon Road	Norton Subcourse	1.1																			
SN0418	Land At Cooks Field	Pulham Market	3.7																			
SN2096	West Of Mill Lane	Pulham Market	3.0																			
SN1024	Ladbrookes, Tattlepot Road	Pulham Market	1.4																			
SN0407	Colegate End	Pulham Market	0.9																			
SN2095	East Of Colegate End Road	Pulham Market	0.7																			
SN0166	Gosmore, Colegate End Road	Pulham Market	0.6																			
SN4085	Land Adj Orchard Court Station Road	Pulham Market	0.3																			
SN1052R	Norwich Road/Poppys Lane	Pulham St Mary	4.0																			
SN1027	Land East Of Goldsmith Way	Pulham St Mary	1.3																			
SN0430	Land Off Station Road	Pulham St Mary	0.9																			
SN0398	The Street	Pulham St Mary	0.8																			
SN1053	Land West Of Mill Lane	Pulham St Mary	0.8																			
SN0575	Flanders Meadow, Station Road	Pulham St Mary	0.6																			
SN0363SL	The Maltings, Station Road	Pulham St Mary	0.3																			
SN0008SL	The Sycamores	Pulham St Mary	0.2																			
SN0531	Land West Of Lower Road	Rockland St Mary	15.5																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN2063	North Of The Street	Rockland St Mary	2.0																			
SN2064REV	South Of The Street	Rockland St Mary	1.3																			
SN2061REV	North Of The Street	Rockland St Mary	1.0																			
SN2070	West Of The Oaks, Bramerton Lane	Rockland St Mary	1.0																			
SN0165	Land At Bramerton Ln & Rookery H	Rockland St Mary	8.0																			
SN2007	South Of New Inn Hill	Rockland St Mary	0.5																			
SN0526REV	Land Off High Road	Roydon	1.1																			
SN4005	North Of Norwich Road	Saxlingham Nethergate	1.0																			
SN4007SL	South Of Norwich Road	Saxlingham Nethergate	0.4																			
SN0198SL	6 Kensington Close	Saxlingham Nethergate	0.3																			
SN4034SL	Land West Sandpit Lane	Saxlingham Nethergate	0.1																			
SN4023	South Of Bungay Road	Scole	8.1																			
SN4022	East Of Norwich Road	Scole	4.8																			
SN0511	Land South Of Norwich Road	Scole	1.0																			
SN0527REV	Land South Of Bungay Road	Scole	1.0																			
SN0338REV	Rose Farm, Bungay Road	Scole	0.6																			
SN2066	1 Bridge Road	Scole	0.5																			
SN0399SL	Land At Street Farm	Scole	0.3																			
SN0405	Land At Brooke Road	Seething	1.3																			
SN1035	Land South Of Wheelers Lane	Seething	0.8																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN2148	West Of Mill Lane	Seething	0.5																			
SN0406SL	West Of Seething Street	Seething	0.5																			
SN0587SL	Land West Of Seething Street North	Seething	0.4																			
SN0588SL	Land West Of Seething St South Site	Seething	0.3																			
SN3011	Havencroft Poultry Site	Shelfanger	3.4																			
SN0399	Rectory Road	Shelfanger	8.0																			
SN0364	Land South Of Heywood Road	Shelfanger	0.6																			
SN4074	Land North Druids Lane	Shelfanger	0.5																			
SN4075	Land West Church Road	Shelfanger	0.4																			
SN4077SL	Land Off Church Road	Shelfanger	0.2																			
SN4076SL	Land Off Druids Lane	Shelfanger	0.2																			
SN0590	Land North Of The Street	Shotesham	3.0																			
SN4013	Shotesham Common	Shotesham	0.7																			
SN0534	Land North Of The Street	Shotesham	0.7																			
SN4028	Adj High View The Common	Shotesham	0.3																			
SN2101	Spooner Row	Spooner Row	76.8																			
SN0445	Land At Spooner Row	Spooner Row	52.3																			
SN2157	North West Of London Road	Spooner Row	9.1																			
SN0447	Land At Spooner Row	Spooner Row	6.9																			
SN0488	Land At Spooner Row	Spooner Row	4.0																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN0444	Land At Spooner Row	Spooner Row	3.6																			
SN2082	South Of Station Road	Spooner Row	3.2																			
SN4060	Land South Bunwell Road	Spooner Row	1.1																			
SN0446	Land At Spooner Row	Spooner Row	0.9																			
SN0567	Land At Spooner Row	Spooner Row	8.0																			
SN0568	Corner Station Rd & Top Common	Spooner Row	8.0																			
SN3022	South Of Station Road	Spooner Row	0.7						ı													
SN0404	Land South East Of Chapel Road	Spooner Row	0.7																			
SN0569	Corner Bunwell Rd & Queens St	Spooner Row	0.7																			
SN2181	School Lane	Spooner Row	0.6																			
SN2001SL	West Of Cross Road	Starston	0.2																			
SN0091	Church Farm, Church Road	Stockton	0.5																			
SN0524	Land South Long Lane	Stoke Holy Cross	6.6																			
SN0197	Land North Long Lane	Stoke Holy Cross	3.7																			
SN0202	Land To North Of Long Lane	Stoke Holy Cross	1.3																			
SN2091	Off Norwich Road	Stoke Holy Cross	1.2																			
SN0030	The Street	Surlingham	1.8																			
SN0030REVA&B		Surlingham	1.8																			
SN2016SL	The Covey	Surlingham	1.0																			
SN2010REV	Mill Road East	Surlingham	1.0																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN0374SL	Builders Yard And Light Industrial	Surlingham	0.3																			
SN2045SL	West Of Mill Road	Surlingham	0.3			ı													ı			
SN2009SL	The Covey	Surlingham	0.2																			
SN0030REVB	Land West The Street	Surlingham	0.2																			
SN0227	Land At Eleven Mile Lane, Suton	Suton	0.7																			
SN3002	11 Briar Lane	Swainsthorpe	1.3																			
SN0603REVA	Off Church View	Swainsthorpe	1.1																			
SN0191R-REVA	South Of Church Farm	Swainsthorpe	1.0																			
SN0542SL	East Of The Vale	Swainsthorpe	0.2																			
SN0426	Land South Of Swardeston House	Swardeston	6.9																			
SN4082	Intwood Lane	Swardeston	6.4																			
SN0204	Site Off Bobbins Way	Swardeston	3.3																			
SN0551	Intwood Lane	Swardeston	1.1																			
SN0517	Land Off The Common	Swardeston	0.6																			
SN0367SL	Land Off Chestnut Drive	Swardeston	0.4																			
SN0084	Horse Meadow	Tacolneston	7.1																			
SN1057	Land West Of Norwich Road	Tacolneston	4.6																			
SN2031	Norwich Road	Tacolneston	1.3																			
SN4019	South Of Hall Road	Tacolneston	1.0																			
SN0602	Land Off The Fields	Tacolneston	0.5																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN4062SL	The Pelican 136 Norwich Road	Tacolneston	0.4																			
SN4061SL	The Pelican, Norwich Road	Tacolneston	0.3																			
SN0016SLREV	122 Norwich Road	Tacolneston	0.2																			
SN0005	Hill Farm, Ipswich Road	Tasburgh	19.5																			
SN0413	Land At Grove Lane	Tasburgh	3.5																			
SN4079	Land North Church Rd & West School	Tasburgh	1.2																			
SN0267REV	Cedar Holdings, Ipswich Road	Tasburgh	1.1																			
SN1051	Land At The Street	Tharston	0.5																			
SN0255	The Laurels, The Street	Tharston & Hapton	1.2																			
SN0149	Land Adj Holly Cottage, Beccles Lane	Thurlton	0.5																			
SN0029	Field 445 South Of Vale Road	Thurton	1.6																			
SN4008	South East Of The Street	Thurton	1.1																			
SN0470	Land Off Vale Road	Thurton	1.0																			
SN0472	Land South Of Vale Road	Thurton	0.7																			
SN2048	South Of Norwich Road	Thurton	0.6																			
SN2112	Between Black Barn Road & Mill Road	Tibenham	1.5																			
SN3008REV	East Of Pristow Green Lane	Tibenham	0.9																			
SN0365SL	Cherry Tree Road	Tibenham	0.3																			
SN2102SL	Long Row	Tibenham	0.3																			
SN4006	West Of Hales Street	Tivetshall	1.0																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN2041	Land East Of Tivetshall	Tivetshalls	19.9																			
SN0319	Site 2 Pear Tree Farm	Tivetshalls	1.1																			
SN2042REVA	South Of Rectory Road	Tivetshalls	1.0																			
SN3006	North Of Croft Lea	Tivetshalls	0.9																			
SN2103	North Of School Road	Tivetshalls	0.8																			
SN0318SL	Site 3 Pear Tree Farm	Tivetshalls	0.6																			
SN2042REVB	Land South Rectory Road	Tivetshalls	0.5																			
SN3002SL	South Of Green Pastures	Tivetshalls	0.2																			
SN0317SL	Site 1 Pear Tree Farm	Tivetshalls	0.2																			
SN0518	Land At Post Office & Beccles Road	Toft Monks	5.3																			
SN1031	Land South Side Of Bulls Green	Toft Monks	0.9																			
SN2005SL	West Of Woodrow Lane	Toft Monks	0.2																			
SN4012	West Of Low Road	Topcroft	0.6																			
SN2146SL	Land West Of The Street	Topcroft	0.4																			
SN2029SL	Topcroft Street	Topcroft	0.3																			
SN4029SL	Land South Stratton Road	Wacton	0.4																			
SN2179	High Street	Wicklewood	3.3																			
SN0535	Land South Of Church Lane	Wicklewood	2.1																			
SN0577REVB	Land South Primary School Opt 2	Wicklewood	1.8																			
SN0577REVA	Land South Primary School Opt 1	Wicklewood	0.9																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	CWS	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN4001	Milestone Lane	Wicklewood	0.9																			
SN4064	Land At Wicklewood Nurseries, High Str	Wicklewood	0.7																			
SN2179REVA	High Street	Wicklewood	0.6																			
SN0232REV	Land South Of Low Street	Wicklewood	0.6																			
SN4045SL	Land Off Hackford Road	Wicklewood	0.5																			
SN0249SL	Land Adj Former Workhouse hospital	Wicklewood	0.5																			
SN1036	Windfalls, Milstone Lane	Wicklewood	0.3																			
SN4050	Land West Hall Road	Winfarthing	3.6																			
SN0556	Land Off Chapel Close	Winfarthing	1.6																			
SN4055	Land West Mill Road	Winfarthing	1.0																			
SN2049SL	South Of Stocks Hill	Winfarthing	0.4																			
SN0452	Land Off The Street	Woodton	6.9																			
SN0150	Land Off Chapel Hill Rd & Hempnall Rd	Woodton	3.7																			
SN0278	Land South Of Church Road	Woodton	3.3																			
SN2130	South Of The Street	Woodton	1.9																			
SN0262	Land North Of Church Road	Woodton	1.0																			
SN0231REV	Land At Suckling Place	Woodton	1.0																			
SN2100	North Of Hempnall Road	Woodton	0.7																			
SN1009SL	Land Junc Chapel Rd & Sunnyside	Woodton	0.6																			
SN0268SL	Land At Church Road	Woodton	0.5																			

Ref.	Name	Village	Area (Ha)	Agricultural land	SPA	SAC-	SSSI	cws	GP	Primary school	Secondary school	Town or village centre	Settlement Limit	Flood zone 2	Surface water flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	River Valley	NSB Landscape Protection Zone	Viewing Cone
SN2121REVC	Land West Low Road	Wortwell	1.3																			
SN2036	East Of Low Road	Wortwell	1.3																			
SN4084	Land South East Low Road	Wortwell	1.0																			
SN2121REVA	High Road	Wortwell	0.9																			
SN2121REVB	Land South High Road	Wortwell	0.9																			
SN0057	Land At Sancroft Way	Wortwell	0.6																			
SN4066SL	Land Adj 29 Low Road	Wortwell	0.4																			
SN4063	Mill Hill, High Road	Wortwell	0.3																			
SN2006SL	High Road	Wortwell	0.3													l						
SN2183	South Of Wymondham Road	Wreningham	2.7																			
SN0431REV	Land At Hethel Road	Wreningham	2.7																			
SN0187	Land Adj Rosko, Wymondham Road	Wreningham	2.0																			
SN0093	Field 2484, West Of All Saints Church	Wreningham	0.5																			
SN0009SL	Land South Of High Road	Wreningham	0.2																			
SN2006	South Of Loddon Road	Yelverton	1.8																			

Appendix II: Early SA work

Introduction

As discussed within Section 5, as an early step in the SA process, AECOM prepared five SA Notes in late 2020 and early 2021, which were used to inform selection of preferred sites (for further testing).

The analysis presented within the five SA Notes is now somewhat superseded, because adjustments were subsequently made to the preferred sites. However, the five SA Notes are included below with a view to demonstrating an iterative site selection process. For those parishes where Neighbourhood Plans are currently being prepared which propose to make their own allocations (Dickleburgh, Burston, Roydon and Scole), this early work on the SA considered potential preferred/shortlisted sites in these locations, whilst confirmation was sought that the relevant Neighbourhood Plans would be in a position to make the allocations. Preferred and shortlisted sites are not included in the Regulation 18 Document for these parishes.

VHCAP preferred sites appraisal

First tranche of village clusters

November 2020

Introduction

The aim of this discrete piece of work is to present an appraisal of the sites within the first tranche of village clusters in relation to the SA framework.

For the avoidance of doubt, this first tranche comprises the following village clusters:

- Aslacton, Great Moulton and Tibenham
- Bressingham
- Bunwell
- Carleton Rode
- · Ditchingham, Broome, Hedenham and Thwaite
- Rockland St Mary, Hellington and Holverston
- Surlingham, Bramerton and Kirby Bedon
- · Thurton and Ashby St Mary

Methodology

The appraisal takes the form of a narrative discussion under each of the SA topic headings. The discussion focusses on 'stand-out' sites in relation to each theme, i.e. those sites which are notably strongly or weakly performing and warrant more detailed attention. Where the potential for a preferred site to perform weakly is identified, the omission sites are reviewed for potential stronger performing alternatives elsewhere in the respective village cluster (where appropriate).

The appraisal is based on a detailed review of AECOM's quantitative GIS distance analysis and WebGIS tool, with more qualitative judgements added in relation to specific 'stand-out' sites which warrant more detailed analysis.

Each SA theme is discussed in a silo, i.e. with no consideration of a site's performance in relation to the other themes (except where there are clear overlaps/synergies between themes). No weight is ascribed to each of the themes – it will be for the decision maker to determine the degree of weight when balancing constraints and opportunities at each site.

It is important to note that the appraisal is therefore a decision-making *tool*, rather than a decision-making document. It is intended that these findings, along with other evidence base documents, help to inform the decision-making process.

Appraisal findings

Accessibility

Preferred sites

In terms of access to local facilities *within* a village cluster, a number of preferred sites stand out as very strongly performing. All three preferred sites in Bressingham (**SN4036**, **SN3019SL** and **SN4037**) are within 100m of the village primary school and all within around 400m of the village shop and playing field, suggesting that development at these locations will robustly support walking and cycling to key day-to-day services. Similarly, preferred sites at Ditchingham (**SN0345**, **SN0373** and **SN2011SL**) stand out as being within easy walking and cycling distance of the village primary school, shop and playing fields (though the remaining site in this cluster - **SN4020** at Broome - is considerably further from all of these features and does not perform strongly).

Elsewhere, preferred sites at Rockland St Mary (SN2007 and SN2064REV) stand out as having the additional benefit of good proximity to primary healthcare, with SN2064REV attracting particular attention by virtue of being located adjacent to the village surgery. Whilst SN2007 is peripheral to the village centre and distant from other services, SN2064REV is notable for being within around 200m of the village shop and primary school and appears exceptionally well located for sustainable access to local services within the village.

Other specific preferred sites which warrant attention are sites **SN0418**, **SN1024** and **SN1052REV** within the Pulham Market and Pulham St Mary cluster, each of which is within reasonable walking and cycling distance of the key services of the primary school, shop, pubs and post office within the cluster. Additionally, **SN0459** at Aslacton

and **SN0470** at Thurton each present very good potential for walking and cycling access to their respective village primary schools, though both are more distant from other local services.

Conversely, a number of preferred sites stand out as relatively poorly performing in relation to access to local services. In particular, site **SN2118** at Sneath Common (within the Aslacton, Great Moulton and Tibenham cluster) is notable for its location nearly 2km from Aslacton primary school and in a cluster with no village shop or GP. Similarly, and as noted above, site **SN2007** in Rockland St Mary is at the village periphery, with the school and village shop each located several hundred metres beyond the 800m threshold generally accepted as a reasonable 10 minute walking distance.

Other preferred sites beyond the 800m walking distance threshold of local services are **SN4009** at Carleton Rode, **SN1027** at Pulham St Mary and three of the four sites in the Bunwell cluster, namely **SN2126**, **SN0538REV** and **SN0539**.

In terms of access to higher-tier services and facilities at larger villages and towns, the majority of the preferred sites are not within reasonable walking or cycling distance, and many do not appear to directly support access via fast and frequent public transport. Of particular note in this regard is Site **SN4009** at Carleton Rode, which is over 8km from the nearest town centre services at Wymondham, whilst also being poorly served by public transport. Other preferred sites of particular note in relation to higher-tier services include all four sites at Bunwell, which are over 7km from Long Stratton town centre and are poorly served by public transport.

Notable exceptions to this general finding are sites at Ditchingham, all of which are within reasonable cycling distance of town centre services at Bungay and which benefit from fast and frequent bus services direct to Bungay town centre.

Omission sites

The strongly performing omission sites in relation to accessibility to local services within a village cluster are generally in the same clusters as the strongly performing preferred sites. For example, several omission sites in the Pulham Market and Pulham St Mary village cluster are within a 10 minute walk of a GP. However, the preferred sites in the same cluster all benefit from the same degree of accessibility and are therefore not out-performed by the omission sites.

However, a notable exception to this principle is Site **SN2118** at Aslacton. The site is nearly twice the 800m walking distance threshold from the village primary school, whilst there are three omission sites located within 800m of the school, namely **SN1041**, **SN1042** and **SN2008SL**.

In terms of external access to higher tier services at larger settlements, none of the omissions sites appear to perform more strongly than the preferred sites as all are located several kilometres from the nearest identified town or village centre.

Biodiversity

Preferred sites

The key strategic biodiversity constraints are in relation to the district's proximity to internationally designated Special Protection Areas (SPAs) Special Areas of Conservation (SACs) and Ramsar sites associated with the Broads. Much of the extent of these designations overlap in South Norfolk.

Three preferred sites stand out for their close proximity to one or more of these sensitive internationally designated sites. Sites SN2010REV and SN2045SL, both in Surlingham, as well as SN2007 in Rockland St Mary are all within or around 800m from the extent of the Broadland SPA and Ramsar site, and the Broads SAC. This could be close enough to give rise to adverse effects through habitat disturbance, water runoff and potentially recreational pressure. A further two sites – SN2064REV at Rockland St Mary and SN0470 at Thurton – are within 1700m of the Broadland SPA and there could be some degree of impact pathway to sensitive receptors at the designated sites. All other preferred sites are over 4km from the international designated sites and are considered unlikely to have potential for adverse effects.

In terms of national scale designations, sites at Ditchingham draw attention for their close proximity to the Broome Heath Pit Site of Special Scientific Interest (SSSI). The Heath is at the centre of Ditchingham village, meaning all three Ditchingham sites are within 430m of the SSSI. Of these, site **SN0345** particularly stands out on the basis that it is just 31m from the SSSI. This makes it the third-closest site to a SSSI across the entire longlist of site options in the district, and by far the closest of the preferred sites in Tranche 1. However, more detailed examination reveals that the SSSI is very small and the 'Impact Risk Zone' (IRZ) around it – essentially the area within which proposed development would trigger a need to consult Natural England – is correspondingly small. Consequently,

SN0345 lies outside the IRZ for residential development and none of the Ditchingham sites are considered notably likely to give rise to significant effects on the SSSI as a result, though there could be potential for less-than-significant adverse effects from factors such as increased trampling underfoot.

Similarly, site **SN0459** at Aslacton is within around 5-10 minutes walking distance of the Aslacton Parish Land SSSI suggesting development could give rise to increased risk of less-than-significant effects via increased recreational pressure, again including from activities such as trampling. Elsewhere, it is noted that three sites (**SN2010REV** and **SN2045SL** at Surlingham and **SN2007** at Rockland St Mary) are within 10 minutes walk of the Yare Broads and Marshes SSSI and there could be some potential for adverse effects from shoreline activities such as dog walking and fishing, as well as from waterborne recreation.

In terms of lower tier designations, sites at Ditchingham again stand out for their very close proximity to Broome Heath. Unlike the small, tightly defined SSSI at Broome Heath, the entire expanse of heathland is designated as a Local Nature Reserve (LNR) and County Wildlife Site (CWS), and there would be significant potential for new development to generate additional recreational pressure on the Heath.

A number of preferred sites perform strongly in relation to biodiversity. All preferred sites in the clusters of Bunwell, Carleton Rode, Pulham Market and Pulham St Mary appear to have no notable sensitivity in relation to biodiversity designations at any tier, whilst preferred sites at Bressingham have no notable sensitivity in relation to any designation other than the Horse Fen Carr CWS which could have some sensitivity to recreational pressure.

Conversely, some or all preferred sites at Ditchingham, Rockland St Mary and Surlingham appear to have potential sensitivity in relation to designated sites based on their proximity.

Omission sites

In terms of the higher-tier biodiversity designations, the preferred sites with the greatest sensitivity are at the village clusters of Rockland St Mary, Hellington and Holverston and of Surlingham, Bramerton and Kirby Bedon. It is therefore notable that in both of these village clusters there are available omission sites located a considerably greater distance from the affected SPA, SAC and Ramsar sites. These are listed below:

- Rockland St Mary, Hellington and Holverston: SN0165; SN2061REV; SN2063; SN2070
- Surlingham: SN0366REV

The broad distribution of lower-tier biodiversity designations means that the preferred sites with some degree of sensitivity, such as those in Ditchingham, are not materially more sensitive than omission sites within the same village cluster. It is considered that there is no meaningful opportunity to differentiate between preferred sites and omission sites in relation to lower tier biodiversity designations.

Climate change adaptation

Preferred sites

All of the preferred sites appear to perform strongly in relation to the flood risk element of climate change adaptation. No sites fall within fluvial flood zone 3 (FZ3), and all but one site is unaffected by flood zone 2 (FZ2). The one exception to this is site **SN0373** at Ditchingham, although less than 9% of the site intersects with FZ2 and it is likely that this small area of risk could be incorporated into open space within any future scheme on site.

Most sites are also unaffected by the risk of surface water flooding. All but three sites have no intersect at all with areas of high surface water flood risk (i.e. above 3.3% chance of flooding per annum), and those which do intersect are affected across no more than 3.5% of their area. Seven sites intersect with medium surface water flood risk (i.e. between 1% and 3.3% chance of flooding per annum), though all but one of these are affected across no more than 4% of their area. Three sites stand out as being affected by low surface water flood risk across a substantial proportion of their overall area, i.e. between 0.1% and 1% chance of flooding per annum. These are **SN4036** in Bressingham (65% affected), **SN4009** in Carleton Rode (43% affected) and **SN2118** in Aslacton (42% affected). It may be possible to mitigate areas of low surface water flood risk through design features such as sustainable drainage systems (SuDS).

In terms of the other key dimension to climate change adaptation, namely adapting to a warming climate through incorporating cooling features in new development, there is little to meaningfully differentiate between the preferred sites at this stage.

Omission sites

The strong overall performance of the preferred sites in relation to the climate change adaptation SA theme means there is no need to review the omission sites for more strongly performing potential alternatives.

Climate change mitigation

Preferred sites

There is limited opportunity to appraise or differentiate between the preferred sites in relation to climate change mitigation at this stage. In terms of reducing emissions from the built environment, it is generally the case that large sites – particularly those of a strategic scale of several hundred dwellings or more – offer potential to incorporate innovative low-emissions energy generation processes such as ground source heat pumps and district heat networks. However, such features are generally not possible to deliver at a non-strategic scale and allocations through the VCHAP are unlikely to present opportunities to do so. At the scale of individual buildings it is possible to achieve high standards of energy efficiency in new development through design and construction methods. However, these considerations are detailed in nature and do not have a spatial dimension to them, meaning they do not offer a way to meaningfully differentiate between the preferred sites – all sites have the same theoretical potential to incorporate energy efficiency measures.

In terms of emissions from transport sources, there are natural synergies with the SA themes of Accessibility and of Transport, as the aim of delivering development with low car dependency where possible will support the objective of reducing CO_2 emissions from all sources. On this basis, the findings in relation to Accessibility are considered to also apply in relation to reducing emissions from transport sources.

Omission sites

On the basis that it is not possible to meaningfully appraise or differentiate between the preferred sites in relation to climate change mitigation it is not possible to review the omission sites for more strongly performing potential alternatives.

Communities

Preferred sites

In order to protect and enhance the provision of local services and narrow the deprivation gap, and gap between stronger and weaker health and wellbeing outcomes within the district, it could be beneficial to secure additional social infrastructure through the development process.

However, it may be possible to distribute the planning gain captured through mechanisms such as CIL within a settlement or even a village cluster as a whole. This would mean that the specific site at which development comes forward will be less important than the settlement or cluster in which that site is located.

On this basis it is considered that there is limited opportunity to appraise site-specific performance of the preferred sites in relation to the communities SA theme.

Omission sites

However, data from the Index of Multiple Deprivation reveals that some omission sites are much lower on the rankings of multiple deprivation (i.e. are more deprived overall) than some preferred sites in the same village cluster, suggesting that there could be potential to target development at locations where planning gain may have the greatest positive impact.

The most notable example of this is at Bressingham. All preferred sites in the Bressingham cluster are ranked 17th out of all the village clusters across South Norfolk where 1 = least deprived. However, the omission site **SN3038** at Bressingham is ranked 65th, and suggesting it is notably more deprived in relative terms. In theory, there could be some potential for development at site **SN3038** to deliver targeted planning gains via S106 which could potentially help reduce the area's relative deprivation. However, on balance it is considered that this is unlikely to be a significant differentiator in practice. Overall it is considered that there is little potential to meaningfully differentiate between the preferred and omission sites in relation to the communities SA theme.

Economy

Preferred sites

In general, the preferred sites appear to perform broadly on a par in relation to the economy SA theme. As noted under the accessibility theme, some sites could have better potential to access nearby town centre employment

opportunities via sustainable modes of travel, though many residents will be employed at locations other than their nearest town or local centre. None of the preferred sites are close to an allocated employment site.

Nevertheless, there is still value in identifying sites closest to large settlements on the basis that these will have the best access to the widest range of local employment opportunities. As such, preferred sites at Bressingham are notable for being located within a short commute of Diss, one of the district's largest settlements and the largest in the south of the district. Diss provides a wide range of employment opportunities and its transport links, including the railway station, provide onward connectivity to other regional employment hubs.

More broadly, there could be potential for larger sites to deliver an element of local employment, such as via a rural office hub or co-working space. Larger sites could be more likely to support this on the basis that smaller sites would likely focus on an entirely housing-led development to meet local need. However, there is no evidence to identify where there might be specific demand for such employment space and in practice the distribution of rural office hubs will likely be driven by demand factors rather than simply land supply.

Overall, it is considered that preferred sites in Bressingham perform marginally most strongly, but that there is little to differentiate between the remaining preferred sites in relation to the economy SA theme.

Omission sites

On the basis that it is not possible to meaningfully appraise or differentiate between the preferred sites in relation to the economy SA theme it is not possible to review the omission sites for more strongly performing potential alternatives.

Historic environment

Preferred sites

All four preferred sites within the Pulham Market and Pulham St Mary village cluster stand out as having potential for significant effects in relation to both the historic character of the settlements in general *and* in relation to specific historic assets. First, all four sites in the cluster (SN1024 and SN0418 in Pulham Market; SN1027 and SN1052R in Pulham St Mary) are within around 100m of a conservation area suggesting development could have potential for effects on the setting and character of the conservation areas. This is particularly the case at SN1024 which is immediately adjacent to the Pulham Market conservation area. All four sites are also potentially within the setting of adjacent Grade II listed buildings.

Sites at Ditchingham are also relatively close to the village's conservation area, though it is considered that the presence of more contemporary development between the sites and the conservation area is likely to contain the historic character of the sensitive part of the village and limit the potential for harm from new development. All other preferred sites are located well away from conservation areas at locations where new development is unlikely to have an effect on the historic character of any settlement.

However, several sites are located within 50m of at least one Grade II listed building, suggesting they could have some historic environment sensitivity by falling within the buildings' setting. Site **SN0539** at Bunwell includes the Grade II listed Lilac Farmhouse, whilst a further two sites – **SN0538REV** and **SN2126** – are also within close proximity of the same heritage asset. There could be potential for significant adverse effects if all three sites were to come forward together.

Also of note are sites **SN3019SL** and **SN4036** at Bressingham, both of which are within 25m of the Grade II listed Pine Tree Cottage. Development of one or both of these sites may have potential for adverse effects on the listed building, though it may be possible to mitigate this through sensitive design and layout of a future scheme.

Turning attention to other designated historic assets, it is notable that none of the preferred sites are in close proximity to a registered park and garden, and all but three preferred sites have no apparent sensitivity in relation to scheduled monuments. The three sites which are in relatively close proximity to a scheduled monument are all at Ditchingham, with **SN0345** and **SN0373** within 280m of the Broome Heath long barrow, and **SN2011SL** within 240m of earthworks on Broom Heath.

Omission sites

Overall, it is unlikely that notably more strongly performing omission sites are available within the village clusters of greatest historic sensitivity. For example, omission sites at Pulham Market and Pulham St Mary are almost all either within or adjacent to the conservation area and are not materially less sensitive than the preferred sites. Similarly, omission sites at Bunwell are all within close or reasonably close proximity to a range of Grade II listed buildings and do not outperform the preferred sites in this regard.

Omissions sites of low or no sensitivity in relation to the historic environment appear to generally be at settlements at which the preferred sites are also of low sensitivity.

Therefore it is considered that there are no stand-out omission sites which merit inclusion among the preferred sites in relation to their historic environment performance.

Housing

Preferred sites

Housing delivery is a strategic issue in the sense that:

- the minimum overall quantum of growth to be delivered through the VCHAP (i.e. 1,200 homes) is set by the emerging Greater Norwich Local Plan (GNLP); and,
- the preferred spatial strategy underpinning distribution of this growth via the VCHAP will be determined at a
 district-wide scale based on all the available evidence, some of which is still emerging.

In this context, it is assumed that at a district-wide scale there will be sufficient sites to deliver the VCHAP's overall target of 1,200 dwellings and that meeting this target will not rest on the performance of any one specific site. Therefore, for the purposes of this appraisal, attention at a site-specific scale is focussed on the degree to which the preferred sites could support a range of different types and tenures of housing to achieve a broad housing mix.

The key determinant of this is likely to be site capacity, as the larger the scheme the greater the potential to deliver a range of housing types and tenures, including affordable housing. The supporting text of Policy DM 3.1 (Meeting housing requirements and needs) of the 2015 DM Policies Document says that the Council will seek affordable housing on all developments of 5 or more dwellings or at sites of 0.2ha or more. However, this was superseded by the 2019 NPPF, which states that affordable housing will only be sought on 'major' sites (i.e. 10 or more dwellings, or over 0.5ha). As such, the VCHAP is seeking to allocate sites of at least 0.5ha, to accommodate 12+ dwellings. Sites smaller than this will be treated as extensions to the settlement limit, rather than allocations towards the 1,200-dwelling requirement. It will therefore be important that the larger sites maximise their potential to deliver a range of affordable tenures where possible.

A total of nine of the preferred sites are smaller than 1ha and will therefore be considered as settlement limit extensions, unless there are exceptional circumstances which suggest the site could still come forward for 12+ dwellings. These sites are in Surlingham, Ditchingham, Bressingham, Bunwell, Aslacton, Rockland St Mary, Carleton Rode, Bunwell and Broome. This wide distribution of small preferred sites suggests that no single village cluster is likely to be particularly vulnerable to under-delivery of affordable housing and housing mix more broadly, other than Carleton Rode, where no larger site has currently been shortlisted.

On this basis, the preferred sites are considered to perform strongly in relation to the housing SA theme.

Omission sites

The overall performance of the preferred sites in relation to the housing SA theme and the strategic nature of many strands of housing delivery suggests there is no value in reviewing the omission sites for better performing site-specific alternatives.

Land and soils

Preferred sites

There is a need to avoid directing development to areas of the highest quality, or 'best and most versatile' (BMV) agricultural land where land of poorer quality is available. In the context of rural settlements, where opportunities to redevelop brownfield sites can be scarce, it is inevitable that a degree of development will be directed to greenfield sites at the edge of the existing built area.

In light of the above, it is noted that only one of the preferred sites is partially within the existing development boundaries of any of the village clusters – site **SN2126** at Bunwell. The remaining sites are all on greenfield land at the periphery of the built area, the majority of which appears to be in productive agricultural use.

Just one preferred site – **SN2011SL** at Ditchingham – is *not* underlain by land with potential to be BMV land. All other preferred sites are underlain by land which is either Grade 3, and therefore has potential to be BMV, or Grade 2, which is definitively BMV. Therefore, both sites at Rockland St Mary and both sites at Surlingham stand out as being the only four sites underlain by Grade 2 land. It is not clear whether the remaining sites which are all Grade 3 are underlain by 3a, which is BMV, or 3b, which is poorer quality.

Omission sites

Based on the above, it appears as though sites at Rockland St Mary and at Surlingham are the most sensitive of the preferred tranche 1 sites in relation to agricultural land quality. The omission sites at these settlements could therefore have potential to provide less-sensitive alternatives to the preferred sites.

It is therefore notable that a total of four omission sites at Surlingham are underlain either wholly or substantially by poorer quality land or previously developed land. On this basis, omission sites **SN2009SL**, **SN2016SL**, **SN0030** and **SN0374SL** are all more strongly performing in relation to land and soils.

There are no omission sites at Rockland St Mary which are more strongly performing than the preferred sites in relation to land and soils.

Landscape

Preferred sites

South Norfolk has several local landscape designations and there is also a need to consider landscape impacts from new development in the north and east of the district on the setting and character of the Broads National Park.

First, all of the preferred sites perform strongly in relation to the local designations of the Norwich Southern Bypass Landscape Protection Zone (NSBLPZ), Strategic Gaps, Viewing Cones and Undeveloped Approaches to Norwich. This is on the basis that none of the preferred sites are within or near to the NSBLPZ and do not have any potential to affect its landscape setting or character. Similarly, none of the preferred sites intersect with the other designations listed above and do not give rise to the potential for effects.

Similarly, the majority of preferred sites are remote from the designated Rural River Valleys. However, in this instance there are notable exceptions, as all four preferred sites in the Ditchingham, Broome, Hedenham and Thwaite village cluster are entirely within the Waveney River Valley. Whilst this is not an absolute constraint to development, it does indicate heightened landscape sensitivity, as explained by Policy DM 4.5 (Landscape Character and River Valleys) of the 2015 DM Policies Document, which says that development proposals should demonstrate how they protect "the distinctive characteristics, special qualities and geographical extents" of the river valleys to avoid harm to their landscape character.

In relation to the Broads National Park, two sites stand out as having potential to fall within the immediate setting of the Park, suggesting development could have potential to affect the special character of the Park or how it is perceived within the landscape. First, site **SN2007** at Rockland St Mary is around 150m from the boundary of the Park, and located on a main road serving as access to the Park. This suggests it could be visible to a large number of people and could have an important role in the transition between the existing built area of Rockland St Mary and the Park itself.

Second, site **SN2011SL** at Ditchingham is also around 150m from the boundary of the Park. However, unlike the rural context of the Rockland St Mary site, the character of the Ditchingham site is strongly under the urbanising influence of the nearby A143 and B1332, which appear likely to abruptly sever the extent of the Park's setting in this area. In practice, the site is unlikely to have any significant sensitivity in relation to the National Park.

Omission sites

The broad extent of landscape designations means that the omission sites within each village cluster are generally affected to a similar degree as the preferred sites. This means that the preferred sites with heightened landscape sensitivity are not out-performed by omission sites within the same village cluster. For example, all omissions sites in the Ditchingham, Broome, Hedenham and Thwaite cluster are also entirely within the Waveney River Valley. Similarly, omission sites in the clusters which are in close proximity to the Broads National Park do not out-perform the preferred sites.

Transport

Preferred sites

There are strong synergies between the Accessibility SA theme and the Transport SA theme as both seek to recognise and prioritise the use of sustainable modes of transport where possible. On this basis, the findings in relation to the preferred sites' potential to support walking, cycling and public transport use are considered to apply here as well.

Separately, there is a need to recognise that the nature of service provision at small settlements will likely mean that some needs continue to be met via private vehicle where it is not practical or possible to do so via sustainable travel modes. This focusses attention on locations at which new development could lead to additional queuing traffic at pinch points or bottlenecks, with associated effects on both air quality and travel times.

First, it is apparent that none of the preferred sites are located near to an Air Quality Management Area meaning that development at any of them will not lead to adverse effects on any AQMA.

However, based on the available data it is challenging to systematically identify local pinchpoints at which queuing traffic could be made worse by additional traffic flows from new development. It is reasonable to assume that small-scale development is unlikely to lead to a significant increase in traffic flows above the existing baseline, so on this basis the small size of the majority of the preferred sites is considered to mean that they are unlikely to result in significant effects in relation to traffic and to emissions.

Four large sites stand out as having potential capacity for a more significant scale of development, namely **SN4036** at Bressingham (2.1ha in size), **SN0418** at Pulham Market (3.7ha in size), **SN1052R** at Pulham St Mary (4ha in size) and **SN0373** at Ditchingham (5.5ha in size). Of these four large preferred sites, **SN0418** at Pulham Market is particularly notable as it is only served by the narrow single track Dunning's Lane which appears to be of very low capacity and unsuitable for supporting more than very limited growth at the site. The scale of growth which could be supported at **SN0373** at Ditchingham also appears to be limited by the low capacity of adjacent roads. It is likely that achieving access from the single track Tunneys Lane to the north of the site would be very challenging, meaning the site will likely be best served by access from Twaite Road to the west, itself of limited capacity. However, it should be noted that the intention of the VCHAP is to allocated sites broadly in the range 0.5ha to 1.0ha, therefore only a part of these larger sites is likely to come forward. As such, this will minimise the impacts of these larger sites, and it should be possible to select that part of the sites with the least transport impact.

Omission sites

In transport terms, it appears as though there could be potential for some omission sites in the Pulham Market and Pulham St Mary cluster to perform more strongly than the preferred site **SN0418**. Specifically, omission sites **SN0398**, **SN0430** and **SN1053** all appear better suited in relation to transport as they each have direct access to higher capacity roads with existing site access in place.

In the Ditchingham, Broome, Hedenham and Thwaite cluster, site **SN0346** appears likely to perform more strongly in relation to transport, as it benefits from a long frontage onto a higher capacity road than the preferred site.

Water

Preferred sites

There is a need to ensure that new development helps minimise pressure on the district's water resources and maintains and enhances the quality of the district's rivers, lakes and other waterbodies. However, in spatial terms this is likely to be best addressed at a strategic scale, i.e. directing growth away from areas of particular sensitivity in relation to issues such as water stress. At a site specific scale this is likely to be managed via the design of a future scheme rather than via spatial choices about alternative sites within the same settlement or same village cluster.

As such, it is considered that it is not possible to meaningfully differentiate between or appraise the performance of the preferred sites in relation to the water SA theme.

Omission sites

In light of the above, it is not possible to review the omission sites for more strongly performing potential alternatives in relation to the water SA theme.

Conclusions

Overview of opportunities and sensitivity hotspots

The appraisal has found that the majority of preferred sites have no notable sensitivity in relation to the majority of SA themes and development would be unlikely to result in significant effects.

A number of the preferred sites were found to perform notably strongly in relation to access to local services and facilities within village clusters, and the majority of preferred sites appear to support walking access to at least a primary school. However, in general the majority of the preferred sites do not appear to support easy sustainable access to higher tier services at larger settlements.

However, some preferred sites were found to have particular sensitivity in relation to multiple SA themes. For example, one or more sites at Ditchingham appear to have sensitivity in relation to a range of environmental constraints including biodiversity, historic environment, landscape and transport. Such 'hotspots' of sensitivity are not necessarily absolute constraints to development, though they indicate heightened potential for significant cumulative environmental effects.

It is important to note that these findings should be seen in the context of the merits of sites at a district-wide scale, i.e. that strongly performing sites in Tranche 1 of the village clusters may not necessarily be the most strongly performing in relation to other sites across the district as a whole.

Preferred site performance in relation to omission sites

In general, it is concluded that the preferred sites perform well in relation to the omission sites. The appraisal finds that under the majority of SA themes the preferred sites demonstrate equal or stronger performance to the omission sites, or that it is not possible to meaningfully differentiate between the preferred and omission sites at such a granular level (e.g. in relation to climate change mitigation).

Key exceptions to this are under the accessibility theme, land and soil theme and transport theme. Here, the appraisal found that a small number of preferred sites performed notably less strongly than some omission sites within the same village cluster. These findings are discussed under the respective SA themes.

VHCAP preferred sites appraisal Second tranche of village clusters

January 2021

Introduction

The aim of this discrete piece of work is to present an appraisal of the sites within the **second** tranche of village clusters in relation to the SA framework. This follows an appraisal of the first tranche of village clusters prepared in November 2020.

For the avoidance of doubt, this second tranche comprises the following eight village clusters:

- Barford, Marlingford, Colton and Wramplingham
- · Burston, Shimpling and Gissing
- Dickleburgh and Rushall
- · Mulbarton, Bracon Ash, Swardeston and East Carleton
- · Newton Flotman and Swainsthorpe
- Tasburgh
- · Winfarthing and Shelfanger
- · Woodton and Bedingham

Of these eight village clusters, there were initially no identified shortlisted sites in the Barford, Marlingford, Colton and Wramplingham cluster, although one has been included at a latter stage, following further discussions with the Highway Authority; however, as a late addition it is not covered by this iteration of the SA work. At least one shortlisted site is identified at the remaining seven village clusters.

Methodology

As with the previous piece of work, the appraisal takes the form of a narrative discussion under each of the SA topic headings. The discussion focusses on 'stand-out' sites in relation to each theme, i.e. those sites which are notably strongly or weakly performing and warrant more detailed attention. Where the potential for a shortlisted site to perform weakly is identified, the omission sites are reviewed for potential stronger performing alternatives elsewhere in the respective village cluster (where appropriate).

The appraisal is based on a detailed review of AECOM's quantitative GIS distance analysis and WebGIS tool, with more qualitative judgements added in relation to specific 'stand-out' sites which warrant more detailed analysis.

Each SA theme is discussed in a silo, i.e. with no consideration of a site's performance in relation to the other themes (except where there are clear overlaps/synergies between themes). No weight is ascribed to each of the themes – it will be for the decision maker to determine the degree of weight when balancing constraints and opportunities at each site.

As with the appraisal of the first tranche of village clusters, it is important to note that this output is therefore a decision-making tool, rather than a which is making those decisions. It is intended that these findings, along with other evidence base documents, help to inform the decision-making process.

Appraisal findings

Accessibility

Preferred sites

Several preferred sites stand out as strongly performing for their potential to support access to key services within their respective village cluster. All three shortlisted sites within the Woodton and Bedringham cluster (SN0262; SN0268SL and SN0278) are notable as all are within 400m of the village school and would support convenient access by walking or cycling. Woodton's other services of the pub and village shop are also within walking distance, though it is not clear whether there is currently a car-free pavement or footpath by which to safely achieve access. Similarly, both preferred sites in the Burston, Shrimpling and Gissing cluster (SN0349 and SN0386) are exceptionally well placed for access to the village primary school, playing fields and pub at less than 200m to each. Also of note is site SN4079, the only preferred site in the Tasburgh cluster, which is also a very short 80m walk from the village school.

A number of preferred sites stand out as relatively poorly performing in relation to access to local services. In particular, sites **SN0204** at Swardeston (within the Mulbarton, Bracon Ash, Swardeston and East Carleton cluster) is notable for its location nearly 2km from Mulbarton primary school and similarly distant from Mulbarton's shops and healthcare. Similarly, **SN0399** in Shelfanger is around 1.6km from All Saints Primary School in Winfarthing, linked by the busy B1077 along which there are no pavements or footpaths.

In terms of access to higher-tier services and facilities at larger villages and towns, none of the preferred sites are within reasonable walking or cycling distance, and many do not appear to directly support access via fast and frequent public transport. Of particular note in this regard are sites **SN0262**; **SN0268SL** and **SN0278** at Woodton, which are all over 7km from the nearest town centre services at Poringland, though several bus services a day are available.

Omission sites

The strongly performing omission sites are generally in the same village clusters as the strongly performing preferred sites. For example, there are many omission sites in the Dickleburgh village cluster which are within a 5 to 10 minute walk of the village primary school. However, the preferred sites in this cluster all benefit from the same degree of accessibility and are therefore not out-performed by the omission sites in this circumstance.

However, there are exceptions to this, particularly in instances where some individual sites are relative outliers in relation to their respective cluster's services. For example, in the Mulbarton, Bracon Ash, Swardeston and East Carleton cluster, sites **SN0204** at Swardeston is beyond reasonable walking or cycling accessibility to the nearest primary school as it is in Mulbarton. This means that omission sites in Mulbarton, of which there are several, all outperform the preferred sites elsewhere in the cluster in terms of primary school access.

In terms of external accessibility to higher tier services at larger settlements, none of the omission sites appear to perform more strongly than the preferred sites in their respective clusters.

Biodiversity

Preferred sites

The key strategic biodiversity considerations are in relation to the district's proximity to internationally designated Special Protection Areas (SPAs) Special Areas of Conservation (SACs) and Ramsar sites associated with the Broads. Much of the extent of these designations overlap in South Norfolk.

In this regard, all 19 preferred sites perform strongly (20, with the additional site at Barford). No preferred site is closer than 9km to either the Broadland or Breckland SPAs, and no site is closer than around 6km to any Ramsar site. Proximity to SACs warrants brief closer attention on the basis that four sites are between 2km and 2.5km of the Norfolk Valley Fens SAC. The Norfolk Valley Fens SAC comprises several dispersed 'component units', and closer examination shows that all four of these sites relate to the same unit, namely Flordon Common. Flordon Common is dual-designated as a Site of Special Scientific Interest (SSSI), and it is therefore significant that the SSSI Impact Risk Zone (IRZ) for residential development does not extend as far as 2km, suggesting these four sites are unlikely to have significant potential for adverse effects.

Looking at SSSIs more broadly, site **SN0399** at Shelfanger is within relatively close proximity of the Redgrave and South Lopham Fens SSSI, at around 450m. This means each site is within the IRZ for residential development, but only in relation to development of 50 units or greater. As the site is not large enough to have capacity for growth of this scale (indeed it is likely to be fewer than 12 dwellings), it is considered that it is not notably sensitive in relation to the SSSI. The remainder of the preferred sites are sufficiently distant from any SSSI to have no potential for direct effects.

Turning to locally designated biodiversity sites, several sites are likely to be within a 5-10 minute walk of a County Wildlife Site (CWS), suggesting that development at these sites could directly increase the number of visitors. There could be an associated risk of less-than-significant effects via increased recreational pressure, including from activities such as trampling and dog walking. Sites **SN2038** at Mulbarton is within 250m of Mulbarton Common CWS which could give rise to similar effects as outlined above. It is recognised that Mulbarton Common is a large and easily accessible resource with a long established recreational role in the community. Development at the preferred site in Mulbarton may not be significant in isolation, though the village has grown substantially in recent years and there could be potential for in-combination effects on the CWS to be significant from the cumulative impact of the preferred site alongside recent growth.

In contrast to County Wildlife Sites, only one of the preferred sites appears to be within a reasonable ten minute walking distance of a Local Nature Reserve (LNR), namely **SN4024** at Newton Flotman which is around 650m from

the Smockhill LNR. However, on the ground there is no direct route via public rights of way from the site to the LNR (which is on the opposite side of the main A140) and it is likely that the nearby sports fields would provide a more convenient recreational opportunity than the LNR for many residents.

Overall, many preferred sites appear to have little or no notable sensitivity in relation to the district's many biodiversity sites. It is of particular note that all preferred sites are sufficiently distant from the highest-tier designations (i.e. SPAs, SACs and Ramsar sites) to have no substantial prospect of giving rise to harmful effects.

Omission sites

The majority of the preferred sites appear to have very low sensitivity in relation to designated biodiversity sites at international, national or local scale. The pattern of distribution of these biodiversity designations across the district means that preferred sites which are close enough to lower tier designations to have some sensitivity, such as sites in Shelfanger, are not materially more sensitive than omission sites within the same village cluster. It is therefore considered that there is no meaningful opportunity to differentiate between preferred sites and omission sites in relation to biodiversity designations.

Climate change adaptation

Preferred sites

All of the preferred sites perform strongly in respect of the fluvial flood risk element of climate change adaptation. This is on the basis that all but one of the preferred sites are entirely outside areas of flood zone 2 (FZ2) or flood zone 3 (FZ3). The only exception to this is site **SN0399** at Shelfanger, of which around 17% falls across FZ2 and FZ3. There could be potential to incorporate these areas of flood risk into open space within the site, though the site is relatively small at 0.8ha and reducing the developable area to incorporate areas of flood risk would reduce the site's capacity further.

There is greater sensitivity to surface water flood risk,. However, only three are affected across more than 10% of their area, and it is considered that sites affected to a lesser extent would likely have good potential to incorporate any areas of risk into open space through matters of site design and layout. The thee sites more substantively affected are:

- SN4055 (16% affected) and SN4050 (40% affected), both at Winfarthing; and
- SN0262 (32% affected) at Woodton.

In terms of the other key dimension to climate change adaptation, namely adapting to a warming climate through incorporating cooling features in new development, there is little to meaningfully differentiate between the preferred sites at this stage.

Omission sites

From the above, it is apparent that baseline sensitivity in relation to flood risk is generally low across the preferred sites. Therefore, the strong overall performance of the majority of preferred sites means there is no need to review the omission sites for more strongly performing alternatives where baseline performance is already strong.

However, it is notable that the settlements of Winfarthing and Woodton collectively include three shortlisted sites most affected by surface water flood risk. Therefore, there could be value in considering stronger alternatives in relation to surface water flood risk at these two settlements. A review of the omission sites reveals that no alternatives at Winfarthing out-perform the preferred sites. At Woodton, one omission site – **SN2100** – is entirely free of fluvial and surface water flood risk and stands out as a stronger alternative to the preferred sites in respect of flood risk.

Climate change mitigation

Preferred sites

There is limited opportunity to appraise or differentiate between the preferred sites in relation to climate change mitigation at this stage. In terms of reducing emissions from the built environment, it is generally the case that large sites – particularly those of a strategic scale of several hundred dwellings or more – offer potential to incorporate innovative low-emissions energy generation processes such as ground source heat pumps and district heat networks. However, such features are generally not possible to deliver at a non-strategic scale and allocations through the VCHAP are unlikely to present opportunities to do so. At the scale of individual buildings it is possible to achieve high standards of energy efficiency in new development through design and construction methods.

However, these considerations are detailed in nature and do not have a spatial dimension to them, meaning they do not offer a way to meaningfully differentiate between the preferred sites – all sites have the same theoretical potential to incorporate energy efficiency measures.

In terms of emissions from transport sources, there are natural synergies with the SA themes of Accessibility and of Transport, as the aim of delivering development with low car dependency where possible will support the objective of reducing CO₂ emissions from all sources. On this basis, the findings in relation to Accessibility are considered to also apply in relation to reducing emissions from transport sources.

Omission sites

On the basis that it is not possible to meaningfully appraise or differentiate between the preferred sites in relation to climate change mitigation it is not possible to review the omission sites for more strongly performing potential alternatives.

Communities

Preferred sites

In order to protect and enhance the provision of local services and narrow the deprivation gap and the gap between stronger and weaker health and wellbeing outcomes within the district it could be beneficial to secure additional social infrastructure through the development process.

However, it may be possible to distribute the planning gain captured through mechanisms such as CIL within a settlement or even a village cluster as a whole. This would mean that the specific site at which development comes forward will be less important than the settlement or cluster in which that site is located.

A review of relative deprivation within the tranche 2 village clusters reveals that there is no opportunity to differentiate between the preferred sites and the omission sites. Omission sites within each village cluster are found to be ranked at the same level as preferred sites on the Index of Multiple Deprivation (IMD), suggesting that there would be no clear opportunity to target growth at locations where planning gain may have a greater positive impact.

On this basis it is considered that there is limited opportunity to appraise site-specific performance of the preferred sites in relation to the communities SA theme.

Omission sites

On the basis that it is not possible to meaningfully appraise or differentiate between the preferred sites in relation to the communities SA theme it is not possible to review the omission sites for more strongly performing potential alternatives.

Economy

Preferred sites

In general, many of the shortlisted sites appear to perform broadly on a par in relation to the economy SA theme. None of the preferred sites are close enough to an allocated employment site to support walking or cycling access, though several are likely to support access by public transport. The sites best placed to access employment allocations via fast and frequent bus services are sites **SN0386** and **SN0349** at Burston, and **SN4079** at Tasburgh, from which regular public transport links connect to employment allocations at Diss Business Park and at Long Stratton respectively.

The majority of village clusters support only limited employment opportunities and it will be necessary for many working age residents to commute elsewhere for employment. Therefore, quick and convenient access to higher tier settlements will be important and there is merit in identifying sites closest to large settlements on the basis that these will have the best access to the widest range of local employment opportunities. As such, preferred sites at Burston, Dickleburgh, Shelfanger and at Winfarthing are notable for being located within a short commute of Diss, one of the district's largest settlements and the largest in the south of the district. Fast and frequent bus connections are available between all four of these settlements and central Diss. Diss provides a wide range of employment opportunities and its transport links, including railway station, provide onward connectivity to other regional employment hubs.

More broadly, there could be potential for larger sites to deliver an element of local employment, such as via a rural office hub or flexible co-working space. Larger sites could be more likely to support this on the basis that smaller

sites would likely focus on an entirely housing-led development to meet local need. Site **SN2038** at nearly 15ha stands out as having particular potential to deliver flexible employment space through a mixed use development. However, there is no evidence to identify where there might be specific demand for such employment space and in practice the distribution of rural office hubs or flexible office space will likely be driven by demand factors rather than simply land supply.

Overall, it is considered that the preferred sites perform broadly on a par with one another. Although there are disparities between different village clusters, for the purposes of this appraisal there is no meaningful potential to differentiate between sites within each respective village cluster.

Omission sites

On the basis that it is not possible to meaningfully appraise or differentiate between the preferred sites within each village cluster, it is not possible to review the omission sites in each cluster for more strongly performing potential alternatives in relation to the economy SA theme.

Historic environment

Preferred sites

Two preferred sites are located within a conservation area, namely **SN0199** at Dickleburgh and sites **SN2038** at Mulbarton. Development at these three sites could have heightened potential for adverse effects on the historic environment as their respective locations are of notable sensitivity. A further three are within 100m of a conservation area, suggesting they could fall within the conservation area setting. These are **SN4055** at Winfarthing, **SN0498REV** at Dickleburgh and **SN0349** at Burston.

There are no preferred sites within the immediate vicinity of Grade I or Grade II* listed buildings. However, several preferred sites are within very close proximity of a Grade II listed building. The following sites are all at particularly risk of effects on a listed building itself or its setting by virtue of their proximity within 50m:

- **SN0199** at Dickleburgh (17m distance)
- **SN0399** at Shelfanger (17m distance)
- SN0349 at Burston (19m distance)
- SN4079 at Tasburgh (21m distance)
- SN0262 at Woodton (39m distance)
- **SN0498REV** at Dickleburgh (44m distance)

Several more sites are within 50-100m of a Grade II listed building, but it is considered the additional distance reduces the potential for adverse effects, as existing development and planted screening limit the extent of the setting of more distant listed assets.

All preferred sites perform strongly in relation to potential for adverse effects on a registered park and garden (RPG). Most sites are a significant distance from an RPG, though three preferred sites are under 1km in distance and may have potential to alter the wider setting of the approach to an RPG. However, in practice, each of these three sites (**SN4024**; **SN4025**; and **SN4079**) are all at least 700m distant and none are of a size likely to support a harmful quantum of growth.

Just one preferred site stands out as sensitive in relation to a scheduled monument, namely **SN4079** at Tasburgh. The site is around 50m from the 'Camp in village' scheduled ancient monument, of which evidence is visible in the form of surface earthworks and ramparts. Although the site would not lead to direct harm to the monument itself, there could be potential for less than significant effects on the scheduled monuments significance via the urbanisation of its immediate setting.

Omission sites

Overall, it is unlikely that notably more strongly performing omission sites are available within the village clusters of greatest historic sensitivity. For example, omission sites at Dickleburgh and Mulbarton are almost all either within or adjacent to the conservation area and are not materially less sensitive than the preferred sites. Similarly, omission sites in settlements where preferred sites are in proximity to listed buildings are generally within close or reasonably close proximity to a range of Grade II listed buildings and do not outperform the preferred sites in this regard. One notable exception to this is at site **SN4079** at Tasburgh, where two omission sites are significantly more distant from the scheduled monument and are likely to have no potential for adverse effects. These are **SN0267REV** and **SN0005**, both over 500m from the monument.

Elsewhere, omission sites of low or no sensitivity in relation to the historic environment appear to generally be at settlements at which the preferred sites are also of low sensitivity.

On balance, it is therefore considered that there are no stand-out omission sites which merit inclusion among the preferred sites in relation to their historic environment performance.

Housing

Preferred sites

Housing delivery is a strategic issue in the sense that:

- the minimum overall quantum of growth to be delivered through the VCHAP (i.e. 1,200 homes) is set by the emerging Greater Norwich Local Plan (GNLP); and,
- the preferred spatial strategy underpinning distribution of this growth via the VCHAP will be determined at a
 district-wide scale based on all the available evidence, some of which is still emerging.

In this context, it is assumed that at a district-wide scale there will be sufficient sites to deliver the VCHAP's overall target of 1,200 dwellings and that meeting this target will not rest on the performance of any one specific site. Therefore, for the purposes of this appraisal, attention at a site-specific scale is focussed on the degree to which the preferred sites could support a range of different types and tenures of housing to achieve a broad housing mix.

The key determinant of this is likely to be site capacity, as the larger the scheme the greater the potential to deliver a range of housing types and tenures, including affordable housing. The supporting text of Policy DM 3.1 (Meeting housing requirements and needs) of the 2015 DM Policies Document says that the Council will seek affordable housing on all developments of 5 or more dwellings or at sites of 0.2ha or more; although this was subsequently superseded by the thresholds for 'major development' in the National Planning Policy Framework . The majority of the shortlisted sites are still above the major development thresholds, meaning that they should theoretically all have potential to deliver some degree of affordable housing on site. In practice, it is likely that it will not be viable to deliver full policy-compliance at the smaller sites; although this is being tested through the joint viability work being undertaken for the Greater Norwich Local Plan and the VCHAP. It will therefore be important that the larger sites maximise their potential to deliver a range of affordable tenures where possible.

All but three of the shortlisted sites are greater than 1ha suggesting they may have a lower risk of under-delivering affordable housing versus the policy requirement. The three sites below 1ha are **SN4056SL** at Dickleburgh (0.5ha), **SN0399** at Shelfanger (0.8ha) and **SN0268SL** (0.5ha) at Woodton. It is therefore of note that Shelfanger's only shortlisted site is one of the smallest in the second tranche of village clusters, suggesting that it may be more challenging to deliver a range of types and tenures of housing at Shelfanger.

Elsewhere, it is considered the wide range of site size across and within the remaining preferred sites is sufficient to help achieve policy compliant delivery of affordable housing where viable and a good housing mix more broadly.

On this basis, the majority of preferred sites are considered to perform strongly in relation to the housing SA theme, though Shelfanger stands out as the weakest of the tranche.

Omission sites

All but one of the omission sites at Shelfanger are also below 1ha in size and do not offer notable differentiation from the preferred sites. The one exception is **SN3011** which is 3.4ha in size and would therefore have capacity to deliver a much broader range of housing types. However, in practice it is considered that **SN3011** is not a materially stronger site option on the basis that Shelfanger itself is a small settlement and is unlikely to need a broad range of housing types, whilst it is also the case that larger sites are available elsewhere in the village cluster at Winfarthing.

Therefore, the overall performance of the preferred sites in relation to the housing SA theme - and the strategic nature of many strands of housing delivery - suggests there are no omission sites likely to represent better performing alternatives.

Land and soils

Preferred sites

The key consideration in relation to land and soils is the need to avoid unnecessary loss of high quality agricultural land by directing growth to areas of previously developed land, or to poorer quality undeveloped land where available.

All but one of the preferred sites are entirely within areas underlain by Grade 3 agricultural land, giving them theoretical potential to be underlain by 'best and most versatile land' (BMV). In practice, however, detailed surveys have not undertaken at any of the sites and it is therefore unclear whether the sites are Grade 3a – i.e. BMV land – or Grade 3b which is of poorer quality. In this context, it is appropriate to flag the potential for development to give rise to the loss of BMV agricultural land, though with the caveat that sufficiently detailed data is unavailable to know this with certainty.

However, it is evident that whilst all of the preferred sites are on greenfield land with no substantive previous development, in practice at least two are not in productive agricultural use and appear to have limited potential to be brought into productive use in future. These are considered to be **SN0204** on the former nurseries/farm shop at Swardeston and **SN4079** at Tasburgh. These sites appear isolated from the wider field network by built form or densely wooded/planted screening, suggesting that they have limited functional arable value in isolation.

Overall, it is considered that there is no meaningful potential to differentiate between the preferred sites in respect of agricultural land quality, though sites **SN4086** and **SN4079**may perform marginally more strongly by virtue of having little or no productive arable potential.

There is also a need to consider impacts on winnable minerals deposits in order to avoid the sterilisation of minerals. However, none of the preferred sites fall within a minerals safeguarding area or minerals consultation area and it is not possible to differentiate between them on this basis.

Omission sites

None of the omission sites are in areas which are identified by the Agricultural Land Classification (ALC) as being in 'urban' or 'non-agricultural' use. Therefore, notwithstanding the potential for some of the omission sites to include individual structures or buildings, none of the omission sites out-perform the preferred sites in terms of being previously developed as all would necessitate land take at greenfield sites.

The majority of omission sites are all broadly on a par with the preferred sites in terms of land quality. However, three notable exceptions to this are sites **SN0150**, **SN1009SL** and **SN2100**, all at Woodton in the Woodton and Bedingham village cluster. The ALC indicates that all three sites are entirely underlain by Grade 4 agricultural land which is of poorer quality than Grade 3. Therefore, in terms of land quality, all three of these Woodton omission sites outperform the four preferred sites at Woodton (**SN0262**; **SN0268SL** and **SN0278**).

Landscape

Preferred sites

South Norfolk has several local landscape designations and there is also a need to consider landscape impacts from new development in the north and east of the district on the setting and character of the Broads National Park.

It is apparent that none of the preferred sites have any sensitivity in relation to the Broads National Park on the basis that all village clusters in tranche 2 are a considerable distance away. The nearest of the shortlisted sites are the three sites at Woodton (**SN0262**; **SN02268SL**; **SN0278**), all off which are over 4km in distance from the national park and are beyond the extent of the landscape setting of the park.

Turning to local landscape designations, the preferred sites perform broadly well, though there are some limited exceptions which warrant closer attention. Although none of the preferred sites intersect with a designated River Valley, sites **SN4079** at Tasburgh and Sites **SN4024** and **SN4025** at Newton Flotman all have potential to fall within the setting of the designated Yare/Tas River Valley. The south western boundary of **SN4079** is adjacent to the Yare/Tas and the open character of the site suggest that development could have potential to harm the localised setting and character of the River Valley.

On closer examination of **SN4024** and **SN4025** both are considered unlikely to affect the landscape quality of the Yare/Tas as the existing built area of Newton Flotman is the is closer to the River Valley and imparts a stronger urbanising influence than the two preferred sites. All other preferred sites are distant from a designation River Valley.

Just one of the preferred sites is within close proximity of the Norwich Southern Bypass Landscape Protection Zone (LPZ), namely **SN0204** at Swardeston. However, at 500m from the southern extent of the LPZ, the visual influence of development on site is unlikely to extend to the LPZ, particularly given that the undulating landform obscures direct sightlines. Similarly, **SN0204** is also the only preferred site to fall within a designated Viewing Cone for long distance views of Norwich. Again, however, on the ground there is considered to be little direct sensitivity as views are obscured by landform as well as the existing built area of Swardeston.

All of the preferred sites perform strongly in relation to the locally designated Strategic Gaps as none are located within or adjacent to the designation.

Omission sites

As above, the preferred sites perform broadly well in relation to designated landscapes, and there is no need to review omission sites for more strongly performing alternatives in relation to nearly all preferred sites.

The only preferred site to stand out as having potential for adverse effects is **SN4079** at Tasburgh as it is adjacent to a designated River Valley and its current openness contributes to the setting of the River Valley. On this basis, omission site **SN0267REV** may represent a stronger alternative in respect of landscape as it is both further from the Yare/Tas designated River Valley at over 300m and less prominent within the landscape as it is screened by the existing built area of the settlement. It is also noted that Tasburgh omission sites **SN0005** and **SN0413** are also slightly further from the River Valley, but both are considered to have heightened sensitivity within the landscape due to their prominence.

Transport

Preferred sites

There are strong synergies between the Accessibility SA theme and the Transport SA theme as both seek to recognise and prioritise the use of sustainable modes of transport where possible. On this basis, the findings in relation to the preferred sites' potential to support walking, cycling and public transport use are considered to apply here as well.

Separately, there is a need to recognise that the nature of service provision at small settlements will likely mean that some needs continue to be met via private vehicle where it is not practical or possible to do so via sustainable travel modes. This focusses attention on locations at which new development could lead to additional queuing traffic at pinch points or bottlenecks, with associated effects on both air quality and travel times.

First, it is apparent that none of the preferred sites are located near to an Air Quality Management Area meaning that development at any of them will not lead to adverse effects on any AQMA.

However, based on the available data it is challenging to systematically identify local pinchpoints at which queuing traffic could be made worse by additional traffic flows from new development. It is reasonable to assume that small-scale development is unlikely to lead to a significant increase in traffic flows above the existing baseline, so on this basis the small size of the majority of the preferred sites is considered to mean that they are unlikely to result in significant effects in relation to traffic and to emissions.

Omission sites

There do not appear to be any stand out omission sites in each cluster which out perform the respective preferred sites. This reflects the fact that in the majority of village clusters sustainable transport connectivity is broadly consistent within each rural settlement, and no one site measurably out performs another in terms of minimising reliance of private vehicles.

Water

Preferred sites

There is a need to ensure that new development helps minimise pressure on the district's water resources and maintains and enhances the quality of the district's rivers, lakes and other waterbodies. However, in spatial terms this is likely to be best addressed at a strategic scale, i.e. directing growth away from areas of particular sensitivity in relation to issues such as water stress. At a site specific scale this is likely to be managed via the design of a future scheme rather than via spatial choices about alternative sites within the same settlement or same village cluster.

As such, it is considered that it is not possible to meaningfully differentiate between or appraise the performance of the preferred sites in relation to the water SA theme.

Omission sites

In light of the above, it is not possible to review the omission sites for more strongly performing potential alternatives in relation to the water SA theme.

Conclusions

Overview of opportunities and sensitivity hotspots

The appraisal has found that the majority of preferred sites have no notable sensitivity in relation to the majority of SA themes and development would be unlikely to result in significant effects.

A number of the preferred sites were found to perform notably strongly in relation to access to local services and facilities within village clusters, and the majority of preferred sites appear to support walking access to at least a primary school. However, none of the preferred sites in this tranche appear to support convenient sustainable access to higher-tier services at larger settlements.

Despite this general finding, some preferred sites were found to have particular sensitivity in relation to one or more SA themes. For example, the preferred site at Tasburgh appears to have sensitivity in relation to a range of environmental constraints including historic environment, landscape and transport. Such 'hotspots' of sensitivity are not necessarily absolute constraints to development, though they indicate heightened potential for significant cumulative environmental effects.

As with all of the village cluster appraisals, it is important to note that these findings should be seen in the context of the merits of sites at a district-wide scale, i.e. that strongly performing sites in this second tranche of village clusters may not necessarily be the most strongly performing in relation to other sites across the district as a whole.

Preferred site performance in relation to omission sites

In general, it is concluded that the preferred sites perform well in relation to the omission sites. The appraisal finds that under the majority of SA themes the preferred sites demonstrate equal or stronger performance to the omission sites, or that it is not possible to meaningfully differentiate between the preferred and omission sites at such a granular level (e.g. in relation to climate change mitigation).

There are a small number of exceptions to this under the 'accessibility', 'climate change adaptation' and 'land and soil' themes under which the appraisal found that some preferred sites performed less strongly than some omission sites within the same village cluster. These findings are discussed under the respective SA themes.

VHCAP preferred sites appraisal Third tranche of village clusters

January 2021

Introduction

This appraisal focuses on sites in the **third** tranche of village clusters. This follows an appraisal of the first tranche of village clusters in November 2020 and an appraisal of the second tranche in January 2021.

This third tranche comprises the following nine village clusters:

- Barnham Broom, Kimberley, Carleton Forehoe, Runhall and Brandon Parva;
- Hemphall, Topcroft Street, Morningthorpe, Fritton, Shelton and Hardwick;
- · Kirby Cane and Ellingham;
- Roydon
- Scole:
- · Seething and Mundham;
- Stoke Holy Cross, Shotesham and Caistor St Edmund;
- · Tharston, Hapton and Flordon;
- Wicklewood.

However, it is important to note that the Roydon village cluster comprises a single site and that this site has not been shortlisted. At least one shortlisted site is identified at the remaining eight village clusters.

Methodology

As with the previous two village cluster sites appraisals, this third appraisal takes the form of a narrative discussion under each of the SA topic headings. The discussion focusses on 'stand-out' sites in relation to each theme, i.e. those sites which are notably strongly or weakly performing and warrant more detailed attention. Where the potential for a shortlisted site to perform weakly is identified, the omission sites are reviewed for potential stronger performing alternatives elsewhere in the respective village cluster.

The appraisal is based on a detailed review of AECOM's quantitative GIS distance analysis and WebGIS tool, with more qualitative judgements added in relation to specific 'stand-out' sites which warrant more detailed analysis.

Each SA theme is discussed in a silo, i.e. with no consideration of a site's performance in relation to the other themes (except where there are clear overlaps/synergies between themes). No weight is ascribed to each of the themes – it will be for the decision maker to determine the degree of weight when balancing constraints and opportunities at each site.

As with the appraisal of the first and second tranches of village clusters, it is important to reiterate that this output is therefore a decision-making tool, rather than one which is making those decisions. It is intended that these findings, along with other evidence base documents, help to inform the decision-making process.

Appraisal findings

Accessibility

Shortlisted sites

Looking first at accessibility to primary schools, the majority of shortlisted sites perform strongly. 15 of the 23 shortlisted sites are under 400m of the nearest primary school, suggesting they have very good potential to supporting access by walking or cycling. Of these, the following five sites stand out as being exceptionally well placed for primary school access, at under 100m distance:

- SN0405 at Seething (30m distance);
- **SN0511** and **SN4022**, both at Scole (33m and 66m distance respectively);
- SN4045SL at Wicklewood (45m distance);
- SN1015 at Hempnall (72m distance).

Even the most distant shortlisted sites in the third tranche of village clusters are not without some merit. Only four shortlisted sites (SN0587SL; SN0196; SN0174 and SN0348) are greater than 800m distance from a primary school, and none of these is more than 950m. Of these four sites, both SN0174 amd SN0196 at Barnham Broom

are connected to the village school by car-free footpaths suggesting that although they are slightly beyond a reasonable walking distance, they could still have some potential to support sustainable access, particularly via cycling. Therefore, sites **SN0587SL** at Seething and **SN0348** at Kirby Cane are considered to perform weakest in relation to primary school access, as both are beyond 800m and neither support access by segregated car-free footpaths for the full extent of the journey between the sites and their respective village schools.

Turning to sustainable access to healthcare, the shortlisted sites have a much weaker performance overall. Only two sites of the total 23 – **SN0220SL** and **SN1015**, both at Hempnall – are within a convenient walking distance of primary healthcare facilities, at 40m and 390m respectively. All other shortlisted sites are at least 2km in distance, with an average distance of 4.2km across the remaining 21 shortlisted sites.

The shortlisted sites are mostly well served by a local village store and/or post office. The following 17 sites are considered to be within convenient walking distance of their respective settlement's village store (distances approximate):

- Barnham Broom: SN0174 (500m), SN0196 (500m), SN2110SLREV (300m) and SN4051 (immediately adjacent).
- Ellingham: SN0305 (550m) and SN3018 (450m).
- Hempnall: SN1015 (200m) and SN0220SL (700m).
- Kirby Cane: SN0348 (550m).
- Scole: SN0338REV (550m), SN4023 (550m), SN0511 (600m) and SN4022 (600m).
- Stoke Holy Cross: SN0202 (800m).
- Seething: **SN0405** (550m), **SN0587SL** (450m) and **SN0406SL** (350m).

The remaining six shortlisted sites are more distant from a local village shop and/or post office and are beyond convenient walking distance. For shortlisted sites at Hapton (SN4048SL) and Wicklewood (SN4045SL, SN4064 and SN0577REVA) this is on the basis that there is no village shop in the village cluster. For shortlisted sites SN0018SL and SN0055 at Barnham Broom it is because the two sites are at the far eastern extent of the linear settlement, likely beyond convenient walking distance of the village shop (though potentially within reasonable cycling distance).

In terms of access to higher-tier services and facilities at larger villages and towns, none of the shortlisted sites are within reasonable walking or cycling distance. However, several are reasonably well served by public transport. Shortlisted sites at Scole appear to perform best in terms of accessibility via public transport as Scole is served by fast, frequent and convenient buses to Diss town centre, from where a wide range of goods, services, employment and transport options are accessible.

Elsewhere, shortlisted sites at Wicklewood to appear to be served by fast and frequent buses (i.e. several services throughout the day) to the wide range of services at Wymondham, whilst sites at Ellingham and Kirby Cane are served by fast bus services to Beccles, though these services do not appear to run beyond mid-afternoon. Sites at Seething are served by fast but infrequent buses to services at Loddon. Pubic transport connectivity at the other shortlisted sites appears infrequent and indirect.

Overall, shortlisted sites at Scole (SN0338REV, SN4023, SN0511 and SN4022) stand out as performing very strongly in relation to accessibility as they benefit both from sustainable and convenient access to the range of local services available within Scole as well as good public transport connectivity with the higher tier services available at nearby Diss.

Shortlisted sites at Hempnall (**SN1015** and **SN0220SL**) perform notably well in terms of accessibility to local services, as all sites are within convenient walking or cycling distance of the village school, shop and doctors surgery. However, there appears to be poor public transport linkages with higher tier services from Hempnall.

Conversely, shortlisted sites at Wicklewood (**SN4045SL**, **SN4064** and **SN0577REVA**) are notable for their good public transport links with higher tier services, though there appear to be very limited services available within Wicklewood itself (aside from the village primary school).

Omission sites

In general, the shortlisted sites perform wwell in respect of accessibility to local services within their village cluster. Therefore, there is limited opportunity to seek stronger alternative options from the omission sites. This is partly because omission sites within most of the settlements tend to be served by the same range of services and facilities as the shortlisted sites. However, one exception to this is omission site **SN0324** at Barnham Broom, which has substantially more convenient access to the village's services, including the school and shop, than shortlisted sites **SN0018SL** and **SN0055**.

In terms of external access to higher tier services at larger settlements, none of the omission sites appear to perform more strongly than shortlisted sites in their respective village or village cluster as all are located several kilometres from the nearest identified town or village centre.

Biodiversity

Shortlisted sites

The shortlisted sites generally perform strongly in relation to internationally designated biodiversity sites as the majority of sites are a significant distance from any of the district's Ramsar sites, Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), or those in neighbouring districts. However, four shortlisted sites fall within 2km of the Norfolk Valley Fens SAC and warrant closer attention. This includes three sites at Barnham Broom (SN0174, SN0196 and SN4051) which are between 1.2 and 1.6km of the Coston Fen unit of the SAC at which sensitivity is derived from its wetland habitat associated with River Yare. However, this unit of the SAC unit has no public access and the three sites are also located downstream of it, suggesting limited potential for direct harm from development. The remaining shortlisted site of relevance is SN4048SL at Hapton, which is around 690m from the Flordon Common unit of the Norfolk Valley Fens SAC. The site's close proximity to the designation combined with the public right of way (PRoW) which traverses the designation suggests that development could increase recreational pressure on the SAC, with associated potential for adverse effects.

Turning to national biodiversity designations, the majority of shortlisted sites are also a significant distance from the nearest Site of Special Scientific Interest (SSSI) and have no potential for adverse effects. Two sites stand out as exceptions to this in terms of proximity, namely **SN0348** at Kirby Cane (600m from Leet Hill SSSI) and **SN4048SL** (690m from Flordon Common SSSI). However, significant effects are not anticipated from development at either site in relation to the SSSI – **SN0348** falls outside the Impact Risk Zone (IRZ) for residential development of any scale, whilst **SN4048SL** is only within an IRZ for development of at least 100 dwellings. In practice, the site will not support development of this scale as it is only 0.5ha in size. None of the shortlisted sites have sensitivity in relation to National Nature Reserves.

At a local scale several sites are within close proximity of a County Wildlife Site (CWS) and warrant closer attention. **SN4022** at Scole is closest of these, at around 135m from the Stoke Lodge Ground County Wildlife Site (CWS), though in practice the CWS is in the grounds of a private residence with no public access and is unlikely to be affected by new development. Site **SN0174** is a similar distance from a CWS at around 150m from the Barnham Broom Fen CWS. In this instance there appears to be greater potential for adverse effects as much of the CWS is wetland associated with the River Yare. The river runs past the site and could potentially be sensitive to groundwater contamination from new development, albeit the site is downstream of the CWS. A further five sites are within 300m of a CWS and could have some moderate potential to increase pressure on the individual sensitivities at each one. The relevant sites are **SN1015** and **SN220SL** at Hempnall (180m and 270m respectively from the Krons Meadows CWS); **SN0338REV** and **SN4023** at Scole (250m from the Adjoining River Waveney CWS) and **SN0196** at Barnham Broom (250m from the Barnham Broom Fen CWS). None of the shortlisted sites appear to have sensitivity in relation to Local Nature Reserves (LNRs) or to areas of designated ancient woodland.

Overall, it is apparent that the majority of shortlisted sites have no notable sensitivity in relation to biodiversity designations at any scale. However, site **SN4048SL** at Hapton stands out as having potential for adverse effects on the Norfolk Valley Fens SAC, whilst five sites are located in close proximity (under 300m) of a County Wildlife Site and could have some limited potential for adverse effects in principle.

Omission sites

The key finding is the potential for effects on the Norfolk Valley Fens SAC from development at site **SN4048SL** at Hapton. Although there are no omission sites in Hapton itself, two omission sites are evident elsewhere in the Tharston, Hapton and Flordon village cluster which have no apparent sensitivity in relation to the SAC. These are sites **SN0255** and **SN1051**, both at Tharston. Both sites are around 2.5km from the SAC and present stronger alternatives to shortlisted site **SN4048SL** in terms of impacts on the SAC.

Climate change adaptation

Shortlisted sites

A notable feature of the third tranche of village clusters is that all of the shortlisted sites perform very strongly in relation to fluvial flood risk as all are located entirely within Flood Zone 1, i.e. the lowest level of fluvial flood risk.

In terms of surface water flooding, the vast majority of sites are affected to no greater extent than 5% of their surface area, suggesting in practice that there is little development constraint as it is highly likely that such limited areas of risk could be incorporated into open space through site design and layout as necessary. Of the three sites which are affected to a greater extent than 5%, site **SN0338REV** at Scole is affected across just 6.5% of its surface area, and **SN4051** is affected across around 9% of its surface area. Therefore, just one site stands out as having any notable potential for flood risk to pose a development constraint, namely **SN1015** at Hempnall which is affected across around 32% of its surface area, including the part of the site closest to existing development. This could reduce the developable area of the site due to the potential need to incorporate open space and mitigation features.

Omission sites

Only one shortlisted site – **SN1015** in Hempnall - appears to have any notable baseline sensitivity in relation to flood risk. A review of the omission sites in Hempnall identifies a total of seven alternatives which have no fluvial flood risk and also have a lower degree of surface water flood risk than the shortlisted site. Of these, omission sites **SN1018**, **SN 1017** and **SN0580** stand out as almost entirely free of flood risk from any source, and could therefore outperform shortlisted site **SN1015** in the context of Hempnall.

The strong performance of the other 20 shortlisted sites means there is no meaningful need or opportunity to identify stronger omission sites.

Climate change mitigation

Shortlisted sites

There is limited opportunity to appraise or differentiate between the shortlisted sites in relation to climate change mitigation at this stage. In terms of reducing emissions from the built environment, it is generally the case that large sites – particularly those of a strategic scale of several hundred dwellings or more – offer potential to incorporate innovative low-emissions energy generation processes such as ground source heat pumps and district heat networks. However, such features are generally not possible to deliver at a non-strategic scale and allocations through the VCHAP are unlikely to present opportunities to do so. At the scale of individual buildings it is possible to achieve high standards of energy efficiency in new development through design and construction methods. However, these considerations are detailed in nature and do not have a spatial dimension to them, meaning they do not offer a way to meaningfully differentiate between the shortlisted sites – all sites have the same theoretical potential to incorporate energy efficiency measures.

In terms of emissions from transport sources, there are natural synergies with the SA themes of Accessibility and of Transport, as the aim of delivering development with low car dependency where possible will support the objective of reducing CO₂ emissions from all sources. On this basis, the findings in relation to Accessibility are considered to also apply in relation to reducing emissions from transport sources, namely that sites at Scole stand out as supporting sustainable access to a range of local facilities as well as higher tier services at Diss.

Omission sites

On the basis that it is not possible to meaningfully appraise or differentiate between the shortlisted sites in relation to climate change mitigation it is not possible to review the omission sites for more strongly performing potential alternatives.

Communities

Shortlisted sites

Securing new community infrastructure through the development process can help protect and enhance the provision of local services, narrow the deprivation gap and narrow the gap between health and wellbeing outcomes within the district. Therefore, it will be important to maximise opportunities to secure such infrastructure where possible.

However, the specific site at which development comes forward may be less important to achieving this outcome than the settlement or cluster in which that site is located. This is because in small settlements, shortfalls in community infrastructure are likely to affect a settlement as a whole, rather than be localised to a specific site. Similarly, divergences in health and deprivation outcomes are unlikely to be pronounced at a localised scale, as they reflect more macro factors. This suggests that opportunities to differentiate between individual sites within a cluster are limited.

On this basis it is considered that there is limited opportunity to appraise site-specific performance of the shortlisted sites in relation to the communities SA theme.

Omission sites

A review of relative deprivation within the tranche 3 village clusters reveals that there is no meaningful opportunity to differentiate between the shortlisted sites and the omission sites. Omission sites within each village cluster are found to be ranked at a similar level as shortlisted sites on the Index of Multiple Deprivation (IMD), suggesting that there would be no clear opportunity to target growth at locations where planning gain may have a greater positive impact.

Overall, it is not possible to review the omission sites for more strongly performing potential alternatives to the shortlisted sites.

Economy

Shortlisted sites

None of the shortlisted sites are close enough to an allocated employment site to support walking or cycling access, though several are likely to support access by public transport. The sites best placed to access employment allocations via fast and frequent bus services are **SN0338REV**, **SN4023**, **SN0511** and **SN4022** at Scole, and **SN4045SL**, **SN4064** and **SN0577REVA** at Wicklewood, from which regular public transport links connect to employment allocations at Diss Business Park and at Wymondham respectively.

The majority of village clusters support only limited employment opportunities and it will be necessary for many working age residents to commute elsewhere for employment. Therefore, quick and convenient access to higher tier settlements will be important and there is merit in identifying sites closest to large settlements on the basis that these will have the best access to the widest range of local employment opportunities. As such, shortlisted sites at Scole are again notable for being located within a short commute of Diss, one of the district's largest settlements and the largest in the south of the district. Diss provides a wide range of employment opportunities and its transport links, including railway station, provide onward connectivity to other regional employment hubs. Elsewhere, sites at Wicklewood perform strongly again on the basis of proximity to employment opportunities at central Wymondham. Shortlisted sites at other settlements are further from the district's larger settlements, and are less conveniently located for easy access to employment opportunities, particularly in terms of access via sustainable transport.

Overall, it is considered that the shortlisted sites at Scole and at Wicklewood perform most strongly. Shortlisted sites at the remaining settlements are found to perform broadly on a par with one another.

Omission sites

On the basis that it is not possible to meaningfully appraise or differentiate between the shortlisted sites within each village cluster, there is no opportunity to review the omission sites in each cluster for more strongly performing potential alternatives in relation to the economy SA theme.

Historic environment

Shortlisted sites

A number of shortlisted sites are located either within or adjacent to a conservation area, suggesting that they may have particular sensitivity in relation to the historic environment. Taking these sites in turn, most notably site SN0406SL falls entirely within the Seething Conservation Area, a settlement of low density rural character. However, the site itself forms a gap in the existing linear pattern of housing along Seething Road, suggesting that new development of sensitive design and massing could potentially present as infill in the existing built area, with good potential to respond positively to the constraints of the conservation area. Elsewhere, around 50% of site SN0405 also falls within the Seething Conservation Area, and the site's location at the north of the settlement makes a contribution to the landscape setting of the conservation area which may be adversely affected by development.

Two shortlisted sites, **SN0511** and **SN4022** are near-adjacent to the northern extent of the Scole conservation area, though in practice the area appears to be of only limited historic character due to the presence of expansive modern development and the severing effect of the busy Norwich Road which limits the extent of the conservation area's setting. **SN0511** in particular appears to have no meaningful potential for harm as it extends an existing contemporary development away from the conservation area. **SN4022** is large and in a prominent location at the

entrance to the village, though it is under strong influence from the busy Norwich Road and existing modern development and has no inter-visibility with the conservation area.

At Hempnall, shortlisted site **SN1015** is nearly 50% within the Hempnall conservation area, and its openness is considered to support filtered views between the conservation area and the open countryside to the north. Development may increase the sense of enclosure along The Street and result in moderate harm to the conservation area's character and setting. Site **SN0220SL** is around 120m from the boundary of the conservation area, suggesting it may have some sensitivity in relation to its setting. However, in practice the site is a discrete extension to existing modern development which is well screened from the historic core of the village and has no notable historic environment sensitivity.

A further four sites are within 500m of a conservation area and may have potential for indirect sensitivity in relation to the wider conservation area setting. These are **SN0338REV** and **SN4023**, both at Scole, and **SN0305** and **SN3018**, both at Ellingham.

A small number of shortlisted sites are within close proximity of a higher-order listed building, i.e. Grade I or Grade II*. Of these, site **SN4045SL** is most notable as it is only around 100m from the Grade I-listed Church of All Saints in Wicklewood, though direct sightlines are filtered by planted screening and by existing buildings. There could still be potential for less than significant adverse effects on the wider setting of the Grade I-listed building. Site **SN0405** is within 140m of the Grade II*-listed Church of St Margaret at Seething, though planted screening and existing development prevent direct sightlines between the two.

Several sites are notable as being within the immediate setting of a Grade II-listed building, suggesting heightened potential for effects from development on the integrity of both a heritage asset and its setting. The following sites are all within 50m:

- SN0220SL at Hempnall (14m distance);
- SN1015 also at Hempnall (19m distance);
- SN4022 at Scole (21m distance);
- SN0511 also at Scole (44m distance);

Four further sites are within 50-100m of a Grade II listed building, but it is considered the additional distance reduces the potential for adverse effects, as existing development and planted screening limit the extent of the setting of more distant listed assets. These sites are **SN0174** and **SN0196** at Barnham Broom; **SN0406SL** at Seething and **SN4045SL** at Wicklewood.

All of the shortlisted sites perform well in relation to scheduled monuments and registered parks and gardens. No effects are anticipated in relation to these assets from any shortlisted site.

Overall, shortlisted sites in the settlements of Hemphall, Seething and Wicklewood appear to have greatest historic environment sensitivity, either in relation to the settlements' respective conservation areas or to individual designated assets.

Omission sites

In this context, it is notable that omission site **SN2081** at Hempnall appears to have much lower sensitivity both in relation to the settlement's conservation area and its individual listed buildings, whilst several omissions sites elsewhere in the same village cluster also perform more strongly, particularly **SN2046**, **SN0580** and **SN0178SL**, all of which are located in Hempnall Green.

At Wicklewood, where one shortlisted site has sensitivity in relation to the village's Grade I-listed church, it is notable that all seven omission sites appear less sensitive, including several which are additionally distant from Grade II* and Grade II listed buildings as well. Omission site **SN2179REVA** stands out as being particularly strongly performing in terms of proximity to designated historic assets.

At Seething all four omission sites are constrained by the village's historic assets and do not offer meaningful opportunities to identify a more strongly performing alternative.

Elsewhere, it is considered that the shortlisted sites perform strongly overall, meaning there is no need or opportunity to identify more strongly performing omission sites.

Housing

Shortlisted sites

As identified in the previous appraisals of village cluster sites, housing delivery is a strategic issue in the sense that:

- the minimum overall quantum of growth to be delivered through the VCHAP (i.e. 1,200 homes) is set by the emerging Greater Norwich Local Plan (GNLP); and,
- the preferred spatial strategy underpinning distribution of this growth via the VCHAP will be determined at a
 district-wide scale based on all the available evidence, some of which is still emerging.

In this context, it is assumed that at a district-wide scale there will be sufficient sites to deliver the VCHAP's overall target of 1,200 dwellings and that meeting this target will not rest on the performance of any one specific site. Therefore, for the purposes of this appraisal, attention at a site-specific scale is focussed on the degree to which the shortlisted sites could support a range of different types and tenures of housing to achieve a broad housing mix.

The key determinant of this is likely to be site capacity, as the larger the scheme the greater the potential to deliver a range of housing types and tenures, including affordable housing. The supporting text of Policy DM 3.1 (Meeting housing requirements and needs) of the 2015 DM Policies Document says that the Council will seek affordable housing on all developments of 5 or more dwellings or at sites of 0.2ha or more; although this was subsequently superseded by the thresholds for 'major development' in the National Planning Policy Framework .

All of the shortlisted sites are still above the major development thresholds, meaning that they should theoretically all have potential to deliver some degree of affordable housing on site. In practice, it is likely that it will not be viable to deliver full policy-compliance at the smallest sites; although this is being tested through the joint viability work being undertaken for the Greater Norwich Local Plan and the VCHAP. It will therefore be important that the larger sites maximise their potential to deliver a range of affordable tenures where possible.

Several of the shortlisted sites are smaller than 1ha suggesting they may have a lower risk of under-delivering affordable housing versus the policy requirement once yields are reduced to incorporate considerations such as open space, access and landscaping. Of these, sites of 0.5ha or less, i.e. the very smallest sites in tranche 3, are listed below:

- SN0018SL (0.2ha) and SN2110SLREV (0.4ha), both at Barnham Broom;
- SN3018 (0.5ha) at Ellingham;
- SN4048SL (0.5ha) at Hapton;
- SN0220SL (0.5ha) at Hempnall;
- SN0587SL (0.4ha) and SN0406SL (0.5ha), both at Seething;
- SN4045SL (0.5ha) at Wicklewood.

It is therefore of note two of the three shortlisted sites in Seething are among the smallest of all the shortlisted sites, suggesting that delivery of a broad range of types and tenures of housing at Seething may potentially be challenging.

Elsewhere, it is considered the wide range of site size across and within the remaining shortlisted sites is sufficient to help achieve policy compliant delivery of affordable housing where viable and a good housing mix more broadly.

On this basis, the majority of shortlisted sites are considered to perform strongly in relation to the housing SA theme, though Seething stands out as the weakest settlement within the third tranche of village clusters.

Omission sites

The three omission sites at Seething are also relatively small, with two of the three also 0.5ha or smaller. One omission site – **SN1035** – is slightly larger at 0.8ha. However, this difference is marginal and it is considered that **SN1035** is unlikely to be a materially stronger option that the shortlisted sites in Seething.

Elsewhere, the overall performance of the shortlisted sites in relation to the housing SA theme - and the strategic nature of many strands of housing delivery - suggests there are no omission sites likely to represent better performing alternatives.

Land and soils

Shortlisted sites

The national Natural England dataset indicates that all but one of the shortlisted sites are underlain by either Grade 2 or Grade 3 agricultural land. The one exception is site **SN1015** at Hempnall, which appears to be underlain by poorer quality Grade 4 soils. Although this dataset is at a low resolution, it nonetheless indicates that the majority of sites have potential to be underlain by 'best and most versatile' (BMV) agricultural land, the loss of which should be avoided if poorer quality land is available. Three sites stand out as having particular sensitivity on the basis that they are underlain entirely by Grade 2 land. These are sites **SN0055**, **SN0018SL** and **SN2110SLREV**, all at Barnham Broom. The remaining sites are all underlain by Grade 3, though it is not possible to determine whether this is 3a, i.e BMV land, or 3b, which is poorer quality.

However, there is scope to differentiate between the shortlisted sites on the basis of land use. A number of sites are considered to perform relatively strongly on the basis that they are not in productive agricultural use and appear to have little or no potential to be brought back into such use in future. First, site SN0338REV at Scole stands out on the basis that it is one of few shortlisted sites to include some previous development, albeit this is in the form of barns associated with Rose Farm which may not be considered previous development in the fullest sense. Site SN4064 at Wicklewood also stands out as being located on land disconnected from the wider countryside and which is technically previously developed, though the current structures on site are greenhouses associated with a commercial nursery. Elsewhere, sites SN3018 at Ellingham, SN0511 at Scole, SN0406SL at Seething and SN4045SL at Wicklewood are all non-agricultural greenfield sites within the built area of their respective settlements and are considered to perform strongly.

Conversely, large sites in productive agricultural use are considered to perform weakly on the basis that their development would remove the greatest quantity of productive arable land from use. On this basis, it is notable that the two weakest performing sites are both at Scole, namely **SN4023** (8.1ha of agricultural land) and **SN4022** (4.8ha of agricultural land). The remaining three sites at Barnham Broom not already discussed above (**SN0174**, **SN0196** and **SN4051**) also perform poorly on the basis that they would remove a collective total of 5.5ha from productive agricultural use.

There is also a need to consider impacts on winnable minerals deposits in order to avoid the sterilisation of minerals. However, none of the shortlisted sites fall within a minerals safeguarding area or minerals consultation area and it is not possible to differentiate between them in this regard.

Overall, it is evident that sites at Barnham Broom and the larger sites at Scole are the weakest performing in relation to land and soils.

Omission sites

On the basis of the above there is scope to identify omission sites at Barnham Broom and Scole which are less sensitive in respect of soil quality. A review of the omission sites reveals that there are no stronger alternatives at Barnham Broom as all omission sites are underlain by Grade 2 agricultural land as well. However, at Scole two omission sites emerge which are underlain by poorer quality Grade 4 soils and therefore perform more strongly than shortlisted sites **SN4023** and **SN4022**. These are omission sites **SN2066** and **SN0527REV**.

Landscape

Shortlisted sites

The vast majority of shortlisted sites are several kilometres away from the Broads National Park and have no landscape sensitivity in relation to it. However, three shortlisted sites in the Kirby Cane and Ellingham cluster fall within 1km of the national park boundary and warrant more detailed attention. Of these, site **SN0305** at Ellingham is closest, and is particularly notable as it occupies the northern extent of an expansive, open field, the southern boundary of which abuts the national park. Additionally, it has the form of a spur, extending the current built area of the village notably westwards into open countryside. Although established trees and hedging along the southern boundary filter views between the site and the national park, partial sightlines are still possible. The openness of the site and its immediate setting suggests that development would fall within the setting of the national park and could alter the way in which the settlement is perceived in the landscape, including the way it relates to the national park. The remaining two shortlisted sites within 1km (**SN3018** and **SN0348**) are screened by the existing built area of Kirby Cane and are considered unlikely to have any landscape sensitivity in relation to the national park.

Turning to local landscape designations, six shortlisted sites intersect with a designated River Valley, listed below:

- SN0305 and SN3018, both at Ellingham;
- SN0348 at Kirby Cane
- SN0202 at Stoke Holy Cross;
- SN0338REV and SN4023 at Scole

On the understanding that the district's designated River Valleys have "distinctive characteristics and special qualities" (as per the adopted DM Policies Document, 2015) there could be some potential for insensitive new development to give rise to adverse effects at these sites. However, of the above sites it is considered that sites SN3018 and SN0338REV represent natural extensions to the existing built area of Ellingham and Scole respectively and have no notable landscape sensitivity. The remaining four sites, i.e. SN0305 at Ellingham, SN0348 at Kirby Cane, SN0202 at Stoke Holy Cross and SN4023 at Scole are open within the landscape and represent protrusions into the open countryside. Therefore they could have potential for adverse effects on the "special qualities" of the designated River Valleys.

All of the shortlisted sites perform strongly in relation to other local landscape designations, as none intersect with the district's designated Strategic Gaps or Viewing Cones, and none have potential to affect the Norwich Southern Bypass Landscape Protection Zone or the Undeveloped Approaches to Norwich.

Omission sites

The majority of the shortlisted sites broadly well in relation to designated landscapes, and there is no need to review omission sites for more strongly performing alternatives in relation to nearly all shortlisted sites.

For the small number of shortlisted sites which fall within or adjacent to a designated River Valley, a review of the omission sites has found that there are none which perform more strongly in the affected settlements. This is because all omission sites in Ellingham, Kirby Cane and Stoke Holy cross are also within or adjacent to a designated River Valley.

It is apparent that a number of omission sites at Ellingham outperform shortlisted site **SN0305** in respect of its sensitivity to the Broads National Park. The strongest of these is omission site **SN4002SL** which is over 700m from the national park boundary and beyond its immediate setting.

Transport

Shortlisted sites

There are strong synergies between the Accessibility SA theme and the Transport SA theme as both seek to recognise and prioritise the use of sustainable modes of transport where possible. On this basis, the findings in relation to the shortlisted sites' potential to support walking, cycling and public transport use are considered to apply here as well. The key findings are that shortlisted sites at Scole (i.e. **SN0338REV, SN4023, SN0511** and **SN4022**) perform most strongly by virtue of supporting access to services via sustainable modes of travel both within Scole itself and to nearby Diss.

Separately, there is a need to recognise that the limited nature of service provision at small settlements will likely mean that some needs continue to be met via private vehicle where it is not practical or possible to do so via sustainable travel modes. This focusses attention on locations at which new development could lead to additional queuing traffic at pinch points or bottlenecks, with associated effects on both air quality and travel times.

Generally it appears unlikely for significant additional traffic flows to result from development proposed through the VCHAP, though it is potentially significant that a total six sites are shortlisted at Barnham Broom, particularly as the village has poor public transport linkages with higher tier settlements. Collectively, this amounts to a total land area of around 7.1ha which could theoretically have capacity to support a high quantum of growth. There could be some potential for additional queuing traffic at the Bell Road/Mill Road crossroads should all six sites be taken forward, with associated potential for increased emissions from queuing traffic.

Similarly, the large scale of two shortlisted sites at Scole, i.e. **SN4022** (4.8ha) and **SN4023** (8.1ha), suggests there is sufficient indicative capacity for a substantial quantum of growth to come forward. If developed in full, these sites could potentially increase traffic flows through central Scole towards the Diss Road/A140 roundabout. Although there is good public transport from Scole to Diss itself, the A140 is a major artery running north-south through the district and it is reasonable to assume new development in Scole would generate more users of this junction, despite the settlement's strong performance in relation to other aspects of transport.

In general, however, it is reasonable to assume that small-scale development is unlikely to lead to a significant increase in traffic flows above the existing baseline, so on this basis the small size of the majority of the remaining

shortlisted sites is considered to mean that they are unlikely to result in significant effects in relation to traffic and to emissions. None of the shortlisted sites will have an effect on an Air Quality Management Area (AQMA).

Omission sites

There do not appear to be any stand-out omission sites in each cluster which outperform the respective shortlisted sites. This reflects the fact that in the majority of village clusters sustainable transport connectivity is broadly consistent within each rural settlement, and no one site measurably out performs another in terms of minimising reliance of private vehicles.

Water

Shortlisted sites

There is a need to ensure that new development helps minimise pressure on the district's water resources and maintains and enhances the quality of the district's rivers, lakes and other waterbodies. However, in spatial terms this is likely to be best addressed at a strategic scale, i.e. directing growth away from areas of particular sensitivity in relation to issues such as water stress. At a site-specific scale this is likely to be managed via the design of a future scheme rather than via spatial choices about alternative sites within the same settlement or same village cluster. As such, it is considered that it is not possible to meaningfully differentiate between or appraise the performance of the shortlisted sites in relation to the water SA theme.

Omission sites

In light of the above, it is not possible to review the omission sites for more strongly performing potential alternatives in relation to the water SA theme.

Conclusions

Overview of opportunities and sensitivity hotspots

The appraisal has found 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.

A number of the shortlisted sites were found to perform notably strongly in relation to access to local services and facilities within village clusters, and the majority of shortlisted sites appear to support walking access to at least a primary school. Of particular note is the strong performance of shortlisted sites at Scole in terms of accessibility to local and higher-tier goods, services, employment and transport options.

Despite this general finding, a small number of shortlisted sites were found to have particular sensitivity in relation to more than SA themes. For example, the shortlisted site **SN4048SL** at Hapton stands out for sensitivity in relation to the internationally designated Norfolk Valley Fens SAC, and also performs poorly in relation to accessibility and transport. Elsewhere, site **SN1015** at Hempnall appears to have some potential for adverse effects in relation the historic environment and flood risk. Such 'hotspots' of sensitivity are not necessarily absolute constraints to development, though they indicate heightened potential for cumulative environmental effects to be greater.

As with all of the village cluster appraisals, it is important to note that these findings should be seen in the context of the merits of sites at a district-wide scale, i.e. that strongly performing sites in this third tranche of village clusters may not necessarily be the most strongly performing in relation to other sites across the district as a whole.

Shortlisted site performance in relation to omission sites

In general, it is concluded that the shortlisted sites perform well in relation to the omission sites. The appraisal finds that under the majority of SA themes the shortlisted sites demonstrate equal or stronger performance to the omission sites, or that it is not possible to meaningfully differentiate between the shortlisted and omission sites at such a granular level (e.g. in relation to climate change mitigation).

There are exceptions to this under the 'accessibility', 'biodiversity', 'climate change adaptation', 'historic environment' and 'land and soil' themes under which the appraisal found that some shortlisted sites performed less strongly than some omission sites within the same village cluster. These findings are discussed under the respective SA themes.

VHCAP preferred sites appraisal

Fourth tranche of village clusters

February 2021

Introduction

This appraisal focuses on sites in the **fourth** tranche of village clusters. This follows an appraisal of the first tranche of village clusters in November 2020 and an appraisal of the second and third tranches in January 2021.

This fourth tranche comprises the following nine village clusters:

- Alpington, Yelverton and Bergh Apton;
- Brooke, Kirstead and Howe;
- Ketteringham;
- · Keswick and Intwood;
- Tacolneston and Forncett End;
- · Tivetshalls:
- Toft Monks, Aldeby, Burgh St Peter, Haddiscoe and Wheatacre;
- · Little Melton and Great Melton;
- · Wacton.

However, it is important to note that the village clusters of Ketteringham, of Keswick and Intwood, and of Wacton contain no shortlisted sites and are therefore not discussed through this appraisal. At least one shortlisted site is identified at each of the remaining six village clusters.

Methodology

As with the previous three village cluster sites appraisals, this fourth appraisal takes the form of a narrative discussion under each of the SA topic headings. The discussion again focusses on 'stand-out' sites in relation to each theme, i.e. those sites which are notably strongly or weakly performing and warrant more detailed attention. Where the potential for a shortlisted site to perform weakly is identified, the omission sites are reviewed for potential stronger performing alternatives elsewhere in the respective village cluster.

The appraisal is based on a detailed review of AECOM's quantitative GIS distance analysis and WebGIS tool, with more qualitative judgements added in relation to specific 'stand-out' sites which warrant more detailed analysis.

As previously, each SA theme is discussed in a silo, i.e. with no consideration of a site's performance in relation to the other themes (except where there are clear overlaps/synergies between themes). No weight is ascribed to each of the themes – it will be for the decision maker to determine the degree of weight when balancing constraints and opportunities at each site.

As with the appraisal of the previous tranches of village clusters, it is important to reiterate that this output is therefore a decision-making tool, rather than one which is making those decisions. It is intended that these findings, along with other evidence base documents, help to inform the decision-making process.

Appraisal findings

Accessibility

Shortlisted sites

None of the shortlisted sites perform notably strongly in terms of accessibility to primary healthcare as none are close enough to provide convenient walking access to a GP. Site **SN1046REV** at Little Melton is nearest to a GP at 1.7km from Hethersett surgery, though this it is unlikely to support safe and convenient cycle access due to the distance to the surgery and the single-carriageway nature of Little Melton Road for much of its extent. It is recognised that Little Melton is well placed for access to the Norfolk and Norwich hospital at nearby Colney, though it is considered unlikely that many patients would seek to access emergency treatment by active transport modes.

By contrast, many of the shortlisted sites have potential to support safe and convenient access by walking or cycling to a primary school as 12 of the total 17 shortlisted sites are likely within a 5-15 minute walk (inferred from a straight line distance of up to 600m). Of these, site **SN0529SL** at Alpington stands out as exceptionally well placed at just 55m from Alpington & Bergh Apton Primary School. Also of note are shortlisted sites **SN2103** and

SN0318SL/SN0319 at the Tivetshalls village cluster which are next closest to a primary school at around 200m distance.

Conversely, shortlisted sites **SN4015SL** and **SN4017** at Burgh St Peter stand out as being by far the most distant from a primary school at over 4km.

Few of the shortlisted sites are well served by a local village store, suggesting that for most sites development will likely embed a degree of car dependency for access to many services. First, the following six sites are considered to be within reasonable walking distance of their respective settlement's village store (distances approximate):

- Brooke: SN0432REVA and SN0432REVB (both 500m);
- Little Melton: SN2044 (75m); SN4052 (350m); SN0488 (400m); and SN1046REV (800m);

Additionally, sites **SN2103**, **SN0318/SN0319SL** and **SN3002SL** are within walking distance of the Tivetshall St Mary sub-Post Office which offers a limited range of services.

All other shortlisted sites appear distant from local retail and unlikely to support walking or cycling access within their respective village cluster and perform poorly in this regard.

In terms of access to higher-tier services and facilities at larger villages and towns, none of the shortlisted sites are within reasonable walking distance, though a small number may be within reasonable cycling distance. These are **SN1046REV** and **SN2044** at Little Melton which are 1.6km and 2km respectively from Hethersett village centre, and **SN0400** at Alpington which is 1.9km from Poringland village centre. However, cycle access from all three of these sites would be via narrow rural roads and is unlikely to be conducive to regular cycle access.

In terms of public transport accessibility, shortlisted sites **SN0432REVA** and **SN0432REVB** at Brooke appear to perform best as Brooke is served by fast, frequent and convenient buses to services at Poringland village centre, a bus journey of around 5 minutes with multiple services a day, which also extend to Norwich city centre.

However, at all other tranche 4 village clusters bus services to higher tier settlements appear either slow, infrequent or both. Of particular note are shortlisted sites **SN4015** and **SN4017** at Burgh St Peter which are by a significant margin the furthest from higher tier services, at around 11.5km from Loddon Village centre and with poor public transport connectivity. These sites are found to perform weakest in relation to access to higher tier services.

Overall, it is apparent that shortlisted sites at Brooke stand out as very strongly performing in relation to accessibility, whilst shortlisted sites at Burgh St Peter and Haddiscoe stand out as particularly weakly performing.

Omission sites

The strongly performing omission sites appear to be generally in the same village clusters as the strongly performing shortlisted sites. For example, there are several omission sites in the Little Melton and Great Melton village cluster which are within a 5 to 10 minute walk of the village primary school. However, the shortlisted sites in this cluster all benefit from the same degree of accessibility and are therefore not out-performed by the omission sites.

In terms of external accessibility to higher tier services at larger settlements, none of the omission sites appear to perform more strongly than the shortlisted sites in the context of their respective clusters.

Biodiversity

Shortlisted sites

The vast majority of shortlisted sites perform very strongly in relation to both nationally designated and internationally designated sites. With the exception of just two shortlisted sites, none of the tranche 4 shortlisted sites appear to have any sensitivity in relation to the district's international designations (i.e. Special Areas of Conservation, Special Protection Areas and Ramsar sites) or its national designations (i.e. Sites of Special Scientific Interest, National Nature Reserves and designated Ancient Woodland).

These two potential exceptions are sites **SN4015** and **SN4017**, both at Burgh St Peter. Due to the overlapping nature of many of the national and international designations in the area, both sites are within around 1600m of the Broads SAC, Broadland SPA and Ramsar site and Barnby Broad and Marshes SSSI.

However, exploring these two sites in more detail it appears unlikely that each site in isolation will be of sufficient size to give rise to direct effects. This is supported by the fact that each site is within a SSSI Impact Risk Zone only for development of 50 dwellings or greater, a quantum of growth unlikely to be supported at either site. However, there could be scope for cumulative negative effects should both sites come forward for development.

Turning to locally designated biodiversity sites, there is greater potential for effects from development. Three shortlisted sites are likely to be within a short walk of a County Wildlife Site (CWS), suggesting that development at these sites could directly increase the number of visitors. The following shortlisted sites are within 400m of a CWS and are likely to be most sensitive:

- SN2044 at Little Melton (around 70m from the Braymeadow CWS);
- SN0414 at Haddiscoe (around 220m from the Devil's End Meadow CWS);
- SN0400 at Alpington (around 315m from the Land south-east of Burgate Lane Farm CWS);

Given the close proximity of the shortlisted sites, there could be an associated risk of adverse effects via increased recreational pressure, including from activities such as trampling and dog walking. Site **SN0414** stands out as weakest performing in relation to local biodiversity designations as a public right of way runs through the Devil's End Meadow CWS and the large scale of the site could mean that development may substantially increase the number of people traversing the sensitive site.

Omission sites

The potential cumulative sensitivity of both shortlisted sites at Burgh St Peter coming forward together is unlikely to be addressed via a specific omission site, as all omission sites in the settlement are a similar proximity from the nearest SAC, SPA, Ramsar site and SSSI. Equally, omission sites at other settlements within the cluster appear to be of broadly similar sensitivity based on their own respective proximities to sensitive features. Therefore, it is considered that no omission sites materially outperform the shortlisted sites at Burgh St Peter in relation to biodiversity.

In terms of alternatives to shortlisted sites with sensitivity to local designations, shortlisted site **SN0414** at Haddiscoe is outperformed by almost all omission sites in the cluster in terms of proximity to a CWS, though these omission site are also much closer to higher tier biodiversity designations and so on balance and unlikely to perform materially more strongly in relation to biodiversity overall.

Elsewhere, it is apparent that all omission sites in the Little Melton and Great Melton cluster are slightly further from the Braymeadow CWS. However, as the CWS appears to be on private land and has no public access it is considered unlikely to be affected by development and the omission sites are therefore not found to perform more strongly. The same is true at Alpington, where the CWS named 'Land south-east of Burgate Lane Farm' is also on private land and appears unlikely to be susceptible to increased recreational pressure.

Climate change adaptation

Shortlisted sites

A notable feature of the fourth tranche of shortlisted sites is that all perform very strongly in relation to fluvial flood risk aspect of climate change adaptation as they are located entirely within Flood Zone 1, i.e. the lowest level of fluvial flood risk.

Turning to surface water flood risk, shortlisted site **SN0432REVB** at Brooke is the most affected by surface water flood risk, with nearly 20% of the site affected by 'low' risk (i.e. an annual chance of flooding of between 0.1% and 1%). However, significant effects are not anticipated and it is considered this level of risk could likely be mitigated through solutions delivered through the development process, such as SUDS.

The majority of the remaining shortlisted sites are affected across no more than 5% of their surface area, suggesting that there is little development constraint as such limited areas of risk could be incorporated into open space through site design and layout as necessary.

In terms of the other key aspect to climate change adaptation, namely adapting to a warming climate through incorporating cooling features in new development, there is little to meaningfully differentiate between the shortlisted sites at this stage.

Omission sites

The strong performance of shortlisted sites at all village clusters in tranche 4 means there is no substantial need or opportunity to identify more strongly performing omission sites.

Climate change mitigation

Shortlisted sites

There is limited opportunity to appraise or differentiate between the shortlisted sites in relation to climate change mitigation at this stage. In terms of reducing emissions from the built environment, it is generally the case that large sites – particularly those of a strategic scale of several hundred dwellings or more – offer potential to incorporate innovative low-emissions energy generation processes such as ground source heat pumps and district heat networks. However, such features are generally not possible to deliver at a non-strategic scale and allocations through the VCHAP are unlikely to present opportunities to do so. At the scale of individual buildings, it is possible to achieve high standards of energy efficiency in new development through design and construction methods. However, these considerations are detailed in nature and do not have a spatial dimension to them, meaning they do not offer a way to meaningfully differentiate between the shortlisted sites – all sites have the same theoretical potential to incorporate energy efficiency measures.

In terms of emissions from transport sources, there are natural synergies with the SA themes of Accessibility and of Transport, as the aim of delivering development with low car dependency where possible will support the objective of reducing CO₂ emissions from all sources. On this basis, the findings in relation to Accessibility are considered to also apply in relation to reducing emissions from transport sources, namely that sites **SN0432REVA** and **SN0432REVB** at Brooke stand out as supporting sustainable access to a range of local facilities as well as higher tier services at Poringland and perform most strongly in terms of minimising car dependency. Sites **SN4015** and **SN4017** at Burgh St Peter and site **SN0414** at Haddiscoe stand out as embedding high car dependency for access to almost all local and higher tier services.

Omission sites

Poorly performing shortlisted sites are not outperformed by omission sites in relation to climate change mitigation on the basis that omission sites are broadly a similar distance from services and would embed a similar degree of car dependency as the respective shortlisted sites at each cluster. Therefore, there is no potential to review the omission sites for more strongly performing alternatives.

Communities

Shortlisted sites

Securing new community infrastructure through the development process can help protect and enhance the provision of local services, narrow the deprivation gap and narrow the gap between health and wellbeing outcomes within the district. Therefore, it will be important to maximise opportunities to secure such infrastructure where possible.

However, the specific site at which development comes forward may be less important to achieving this outcome than the settlement or cluster in which that site is located. This is because in small settlements, shortfalls in community infrastructure are likely to affect a settlement as a whole, rather than be localised to a specific site. Similarly, divergences in health and deprivation outcomes are unlikely to be pronounced at a localised scale, as they reflect more macro factors. This suggests that opportunities to differentiate between individual sites within a cluster are limited.

On this basis it is considered that there is limited opportunity to appraise site-specific performance of the shortlisted sites in relation to the communities SA theme.

Omission sites

A review of relative deprivation within the tranche 4 village clusters reveals that there is no meaningful opportunity to differentiate between the shortlisted sites and the omission sites. Omission sites within each village cluster are found to be at locations ranked at a similar level as shortlisted sites on the Index of Multiple Deprivation (IMD), suggesting that there would be no clear opportunity to target growth at locations where planning gain may have a greater positive impact.

Overall, it is not possible to review the omission sites for more strongly performing potential alternatives to the shortlisted sites.

Economy

Shortlisted sites

Several of the shortlisted sites are notable as being within a very short distance of an allocated employment site, suggesting they may support sustainable access to local employment once the allocations are built out. Shortlisted sites at Little Melton perform well as they are located within around 400m-800m of a Norwich Research Park (NRP) employment allocation at Colney adjacent to the hospital, though the nature of roads linking the village and the employment site do not support safe pedestrian access in their current form. Nevertheless, it is recognised that the travel distance is exceptionally short and planned improvements to the cycle connectivity between Hethersett and the NRP may further enhance the accessibility.

Similarly, shortlisted sites **SN0432REVA** and **SN0432REVB** at Brooke are around 800m from the allocated employment site at Brooke Industrial Park, and car-free pedestrian footpaths link the sites and the employment allocation directly. Elsewhere, sites **SN0400** and **SN0529SL** at Alpington, and site **SN0412REV** at Bergh Apton are beyond walking distance but potentially within cycling distance of Brooke Industrial Park.

All other shortlisted sites are significantly more distant from an allocated employment site and from town centre employment opportunities.

More broadly, there could be potential for larger sites to deliver an element of local employment, such as via a rural office hub or flexible co-working space. Larger sites could be more likely to support this on the basis that smaller sites would likely focus on an entirely housing-led development to meet local need. Site **SN2044** at Little Melton (16.2ha) and **SN0414** (7.1ha) at Haddiscoe stand out as having particular potential to deliver flexible employment space through a mixed use development. However, there is no evidence to identify where there might be specific demand for such employment space and in practice the distribution of rural office hubs or flexible office space will likely be driven by demand factors rather than simply land supply.

Overall, it is considered that the shortlisted sites at Brooke and at Little Melton perform most strongly in relation to economy, whilst the remaining sites perform broadly on a par with one another in terms of supporting access to employment.

Omission sites

Omission sites within Brook and Little Melton have similar proximity to their respective nearest employment opportunities, whilst omissions sites in village clusters with poorly performing shortlisted sites are broadly a similar distance from employment opportunities and do not enable meaningful differentiation. On this basis, it is not possible to find more strongly performing omission sites in each cluster in relation to the economy SA theme.

Historic environment

Shortlisted sites

None of the shortlisted sites are located within or adjacent to a conservation area, though sites **SN0432REVA** and **SN0432REVB** at Brooke are both in close proximity to the Brooke conservation area at around 200m distance. Both sites form part of large open fields at the northern approach to the village along the B1332. Although the openness of the sites helps contribute to the village's rural setting, neither help frame direct views into or out of the historic core of the village and the immediate character of the built area along the B1332 is not of notable historic value. Both sites are consequently considered to have no direct potential for adverse effects on the conservation area. None of the remaining shortlisted sites have any sensitivity in relation to a conservation area

A small number of shortlisted sites have potential sensitivity in relation to a higher order listed building (i.e. Grade I or Grade II*) and these warrant more detailed attention to understand the potential effects from development. Site **SN0400** at Alpington is closest to a Grade I listed building, around 145m from the Church of St Mary in Alpington. However, the site forms an extension to existing modern development at Church Meadow and would be seen in the context of nearby Cherrywood and Fortune Green, such that the area has a contemporary character. Additionally, existing development at Church Meadow (and the pavilion at Yelverton Football Club) severs the setting of the church and screens direct views between the church and the site. Also in the same settlement, **SN0529SL** is around 430m from the church, though in practice this is sufficiently distant for a large expanse of existing built area to mitigate any potential for effects on the wider setting of the church from development at the site. Neither shortlisted site at Alpington is considered to have historic environment sensitivities in practice.

At Haddiscoe, site **SN0414** is around 180m from the Grade I listed Church of St Mary in the village, and in this instance some potential for adverse effects from development is identified. There are direct sightlines between the

site and the church, suggesting that development could have potential to urbanise the attractive rural setting of the church and affect its integrity, particularly given the large scale of the site (7.1ha). However, the size of the site offers the potential to facilitate Village Cluster-scale development out of the direct sight lines/views of the Church.

Three shortlisted sites in the Tivetshalls village cluster – SN0318SL, SN0319 and SN3002SL fall within around 350m of the Grade II* listed Remains of St Mary's Church, though there are no direct sightlines on the ground due to thick planted field boundaries between the sites and the church. Views towards the sites from the church and the church's wider setting are considered unlikely to be affected by development, particularly given the small size of the sites. Similarly, shortlisted site SN1046REV at Little Melton is within 400m of the Grade II* listed Church of St Mary and All Saints, though it falls within the existing built area of the village and is entirely severed from the setting of the church by modern development. All other shortlisted sites are found to be distant from any higher order listed building.

Several shortlisted sites are potentially within the setting of a Grade II listed building. **SN2044** at Little Melton is closest, at around 50m from the Grade II listed Manor House, though in practice it appears it is only the site access track which is adjacent to the listed building, while the site itself is more distant and is well screened. Also at Little Melton, sites **SN0488** and **SN4052** fall within 100m of Grey Cottage and Manor House respectively, though existing development screens the sites from the heritage assets and there is no inter-visibility between them.

Similarly, **SN0318SL** and **SN0319** at the Tivetshalls cluster are within around 65-70m of Century House, though are screened by the placement of existing buildings within the village and have no notable sensitivity. Also at the Tivetshalls cluster, **SN2103** is notable for being within 60m of Elm Tree Farmhouse and a separately listed barn adjacent to it, while **SN3002SL** is around 90m from Croft Cottage. **SN2103** is considered to have potential for adverse effects in relation to Elm Tree Farmhouse and the barn on the basis of its proximity and the fact it would develop the currently rural and tranquil setting of both. This could be mitigated to an extent by planted screening to limit views, and it is recognised that thick screening is already in situ which could be retained. However, there is potential for residual minor adverse effects even once mitigation is considered. **SN3002SL** could have some very limited potential for adverse effects on the wider setting of Croft Cottage by virtue of the partial sightlines between the two and the rural character of the site at present.

All of the shortlisted sites perform well in relation to scheduled monuments and registered parks and gardens. No effects are anticipated in relation to these assets from any shortlisted site.

Overall, shortlisted sites in the settlements of Hadiscoe, Little Melton and the Tivetshalls appear to have greatest historic environment sensitivity. At Haddiscoe this is in relation to direct effects on the specific asset of the Grade I listed Church of St Mary. At the two other clusters it is considered there could be some cumulative sensitivity if all sites were to come forward, due to the collective effect of several sites in close proximity to heritage assets being developed. Although individual sensitivity is relatively low at each, the collective effect of development could be to undermine the historic character of both the Tivetshalls cluster and the Little Melton and Great Melton cluster.

Omission sites

A review of the omission sites finds that at Haddiscoe there are no omission sites of lower sensitivity in the village of Haddiscoe itself, though there are several alternatives within the wider village cluster (i.e. the Toft Monks, Aldeby, Haddiscoe, Wheatacre and Burgh St Peter cluster). Of these, omission sites **SN4016** at Burgh St Peter and **SN0014SL** stand out as being particularly strongly performing in relation to listed buildings at all grades and are considered to perform more strongly than shortlisted site **SN0414** at Haddiscoe as a result.

At the Little Melton and Great Melton cluster it is apparent the omission site **SN0454** performs strongly in relation to the historic environment as it is located south of the main settlement and a significant distance away from the village's designated heritage assets. Additionally, the single omission site at Great Melton – **SN0014** – also performs strongly in relation to the historic environment and has no notable sensitivity in relation to designated assets.

At the Tivetshalls cluster the nucleated pattern of the site options is considered to mean that none of the omission sites clearly outperform the shortlisted sites as all are broadly within similar proximity of the cluster's heritage assets.

Housing

Shortlisted sites

As identified in the previous appraisals of village cluster sites, housing delivery is a strategic issue in the sense that:

- the minimum overall quantum of growth to be delivered through the VCHAP (i.e. 1,200 homes) is set by the emerging Greater Norwich Local Plan (GNLP); and,
- the preferred spatial strategy underpinning distribution of this growth via the VCHAP will be determined at a district-wide scale based on all the available evidence, some of which is still emerging.

In this context, it is assumed that at a district-wide scale there will be sufficient sites to deliver the VCHAP's overall target of 1,200 dwellings and that meeting this target will not rest on the performance of any one specific site. Therefore, for the purposes of this appraisal, attention at a site-specific scale is focussed on the degree to which the shortlisted sites could support a range of different types and tenures of housing to achieve a broad housing mix.

The key determinant of this is likely to be site capacity, as the larger the scheme the greater the potential to deliver a range of housing types and tenures, including affordable housing. The supporting text of Policy DM 3.1 (Meeting housing requirements and needs) of the 2015 DM Policies Document says that the Council will seek affordable housing on all developments of 5 or more dwellings or at sites of 0.2ha or more; although this was subsequently superseded by the thresholds for 'major development' in the National Planning Policy Framework .

Most of the shortlisted sites are still above the major development thresholds, meaning that they should theoretically all have potential to deliver some degree of affordable housing on site. In practice, it is likely that it will not be viable to deliver full policy-compliance at the smallest sites; although this is being tested through the joint viability work being undertaken for the Greater Norwich Local Plan and the VCHAP. It will therefore be important that the larger sites maximise their potential to deliver a range of affordable tenures where possible.

Several of the shortlisted sites are smaller than 1ha suggesting they may have an increased risk of under-delivering affordable housing versus the policy requirement once yields are reduced to incorporate considerations such as open space, access and landscaping. Of these, only two sites - **SN3002SL** at Tivetshalls and **SN0529SL** at Alpington - are smaller than 0.5ha or less and stand out as particularly at risk of affordable under delivery, though these are both in village clusters at which larger site options are also shortlisted, suggesting there is no notable risk at a settlement or cluster scale.

Elsewhere, it is considered the wide range of site size across and within the remaining shortlisted sites is sufficient to help achieve policy compliant delivery of affordable housing where viable and a good housing mix more broadly.

On this basis, the majority of shortlisted sites are considered to perform strongly in relation to the housing SA theme.

Omission sites

The overall performance of the shortlisted sites in relation to the housing SA theme coupled with the strategic nature of many strands of housing delivery suggests there are no omission sites likely to represent better performing alternatives.

Land and soils

Shortlisted sites

The national Natural England dataset indicates that all of the shortlisted sites are underlain by either Grade 2 or Grade 3 agricultural land. Although this dataset is at a low resolution, it nonetheless indicates that the shortlisted sites have potential to be underlain by 'best and most versatile' (BMV) agricultural land, the loss of which should be avoided if poorer quality land is available. Two sites stand out as having particular sensitivity on the basis that they are underlain entirely by Grade 2 land. These are sites **SN0415** and **SN4017**, both at Burgh St Peter. The remaining sites are all underlain by Grade 3, though it is not possible to determine whether this is 3a, i.e BMV land, or 3b, which is poorer quality.

However, there is scope to differentiate between the shortlisted sites on the basis of land use. A small number of sites are considered to perform relatively strongly on the basis that they are not in productive agricultural use and appear to have little or no potential to be brought back into such use in future. First, site **SN0412REV** at Bergh Apton stands out as very strongly performing on the basis that it is entirely previously developed, suggesting that development would likely be a clear positive use of available land. The site comprises hard standing and former industrial sheds or warehouses, all of which appear to be of poor quality and materially detrimental to the rural character of the area and the immediate street scene. Development of the site would, in the context of the VCHAP site options, present a rare opportunity to direct growth to a 100% brownfield site, maximising best use of available land whilst minimising greenfield land take. Elsewhere, **SN0318SL** in the Tivetshalls cluster is in use as a compound for farm equipment and livestock pens and does not appear to have any meaningful potential to revert to productive agricultural land, suggesting development would also represent good use of available land.

The remaining sites appear to be undeveloped, with the majority in functional arable use and a small minority appearing to function as woodlands or non-agricultural private land. Of the sites in agricultural use, site **SN2044** is the clear stand out weakest option as the largest site at 16.2ha. Although in practice it is unlikely that the whole nominated site area would come forward for development, the site's scale means it has potential to support the largest amount of agricultural land to be taken out of use through development. Other sites at which development would take substantial amounts of land out of agricultural use are **SN0414** at Haddiscoe (up to 7.1ha), **SN0488** at Little Melton (up to 3.3ha) and **SN0400** at Alpington (up to 1.9ha).

There is also a need to consider impacts on winnable minerals deposits in order to avoid the sterilisation of minerals. However, none of the shortlisted sites fall within a minerals safeguarding area or minerals consultation area and it is not possible to differentiate between them in this regard.

Overall, it appears that sites at Burgh St Peter and the largest site at Little Melton are the weakest performing in relation to land and soils, whilst site **SN0412REV** is the standout *strongest* performer and would likely result in significant positive effects in relation to land and soils.

Omission sites

The majority of omission sites are all broadly on a par with the shortlisted sites in terms of land quality, with land quality underlying omissions sites generally echoing that of the shortlisted sites. However, there are two notable exceptions to this pattern as both omission site **SN0014** at Great Melton and omission site **SN0210** at Bergh Apton are entirely underlain by poorer quality Grade 4 land and outperform the shortlisted sites in their respective clusters.

Additionally, omission sites **SN4061SL** and **SN4062SL** at Tacolneston each comprise the previously developed site of the Pelican Inn and would therefore support development which does not involve any loss of productive agricultural land (though it is noted that the sites are not mutually exclusive and are different configurations of the same broad parcel of land). In this sense both of these omission sites outperform shortlisted site **SN0602** in the context of the Tacolneston and Forncett End cluster.

Landscape

Shortlisted sites

Looking first at national level landscape designations, the vast majority of the shortlisted sites are distant from the Broads National Park and have no potential for effects in relation to its landscape character or setting. The only shortlisted site in close proximity of the park is **SN0414** at Haddiscoe which is within 100m of the National Park boundary. However, despite this proximity and the relatively large size of the site (7.1ha) the site does not have direct sensitivity in relation to the setting of the park as existing development lies in the way, severing the park's immediate setting. However, the scale of development that could be theoretically supported at a site of this size could urbanise the wider approach to the park along the A143, creating the impression of a more abrupt transition from built environment to natural environment and therefore potentially harming the wider setting and character of the park.

In terms of local landscape designations, the shortlisted sites broadly perform well, and it is notable that none of the shortlisted sites have any apparent sensitivity in relation to the district's designated River Valleys or designated Strategic Gaps. However, a small number of shortlisted sites in the Little Melton and Great Melton cluster stand out for their proximity to the Norwich Southern Bypass Landscape Protection Zone (NSBLPZ) and to the long range viewing cones to Norwich and warrant closer attention.

Two of these shortlisted sites – **SN4052** and **SN0488** – are 100% within the NSBLPZ, whilst a third site – **SN2044** – is around 70% within the NSBLPZ. The purpose of the designation 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" (as per Policy 4.6 of the adopted DM Policies Document, 2015). Development within the NSBLPZ therefore has implicit potential to undermine or erode Norwich's landscape setting.

In this context it is considered that there is substantial potential for adverse landscape effects from development at **SN4052** and **SN0488**. Both sites are in very close proximity to the bypass, including the raised on- and off-ramps to the B1108 junction. Visibility between the sites and bypass is partially obscured in places by the adjacent embankment, but there are likely to be glimpsed views between the sites and the bypass carriageways, and potential for additional visibility from the elevated B1108 junction, particularly in winter when verge-side planting is bare and has less of a filtering effect. The two sites appear to have localised prominence within the landscape, suggesting development has potential to visibly urbanise the protected landscape to the south of the bypass, reducing the countryside buffer between the bypass and the existing built area of Little Melton. **SN2044** appears

less sensitive on the basis of being a greater distance from the bypass and as a result of several bands of dense planted screening running between the bypass and the site.

Additionally, the following four sites at Little Melton fall either fully or partially within a designated Viewing Cone for long distance views of Norwich:

- SN0488 (50% intersect with viewing cone);
- SN1046REV (100% intersect with viewing cone);
- **SN2044** (100% intersect with viewing cone);
- **SN4052** (100% intersect with viewing cone);

However, on the ground it appears there is little direct sensitivity at any of these four sites as long range views are obscured by landform and tree cover.

Overall, sites at the Little Melton and Great Melton cluster clearly stand out as having potential sensitivity in relation to landscape designations, with sites **SN4052** and **SN0488** emerging as having particular potential for adverse landscape effects in relation to the NSBLPZ. Sensitivity in relation to landscape designations elsewhere is generally low, though the scale of site **SN0414** at Haddiscoe suggests it could have indicative capacity for a scale of development which would give rise to adverse effects on the wider setting and approach to the Broads National Park.

Omission sites

Omission sites **SN0397** at Little Melton and **SN0014** at Great Melton appear to perform strongly in relation to landscape by virtue of their respective distance from either the NSBLPZ or the designated long-range Viewing Cones. Both sites consequently out-perform the shortlisted sites **SN4052** and **SN0488** in terms of landscape effects.

At Haddiscoe, omission site **SN0392** is both smaller and more distant from the National Park than the shortlisted site in the settlement and is therefore considered likely to have lower potential for effects on the landscape setting of the park.

Transport

Shortlisted sites

There are strong synergies between the Transport SA theme and the Accessibility SA theme discussed above, as both seek to recognise and prioritise the use of sustainable modes of transport where possible. On this basis, the findings in relation to the shortlisted sites' potential to support walking, cycling and public transport use are considered to apply here as well. The key findings are that shortlisted sites at Brooke (i.e. **SN0432REVA** and **SN0432REVB**) perform most strongly by virtue of supporting access to services via sustainable modes of travel both within Brooke itself and to nearby Poringland and further afield to Norwich, whilst shortlisted sites at Burgh St Peter (**SN4015** and **SN4017**) and at Hadiscoe (**SN0414**) perform notably poorly.

Separately, there is a need to recognise that the limited nature of service provision at small settlements will likely mean that some needs continue to be met via private vehicle where it is not practical or possible to do so via sustainable travel modes. This focusses attention on locations at which new development could lead to additional queuing traffic at pinch points or bottlenecks, with associated effects on both air quality and travel times.

In general it appears unlikely for significant additional traffic flows to result from development proposed through the VCHAP, though in Little Melton it is potentially significant that four sites with a total area of 21.4ha are shortlisted, particularly as the village has relatively poor public transport linkages with higher tier settlements, despite proximity to Norwich. There could be some potential for additional queuing traffic within the village should all four sites be taken forward, with associated potential for increased emissions from queuing traffic.

In general, however, it is reasonable to assume that small-scale development is unlikely to lead to a significant increase in traffic flows above the existing baseline, so on this basis the small size of the majority of the remaining shortlisted sites is considered to mean that they are unlikely to result in significant effects in relation to traffic and to emissions. None of the shortlisted sites will have an effect on an Air Quality Management Area (AQMA).

Omission sites

There do not appear to be any stand-out omission sites in each cluster which outperform the respective shortlisted sites. This reflects the fact that sustainable transport connectivity is broadly consistent within each rural settlement, and no one site measurably outperforms another in terms of minimising reliance of private vehicles.

Water

Shortlisted sites

There is a need to ensure that new development helps minimise pressure on the district's water resources and maintains and enhances the quality of the district's rivers, lakes and other waterbodies. However, in spatial terms this is likely to be best addressed at a strategic scale, i.e. directing growth away from areas of particular sensitivity in relation to issues such as water stress. At a site-specific scale this is likely to be managed via the design of a future scheme rather than via spatial choices about alternative sites within the same settlement or same village cluster.

As such, it is considered that it is not possible to meaningfully differentiate between or appraise the performance of the shortlisted sites in relation to the water SA theme.

Omission sites

In light of the above, there is no opportunity to review the omission sites for more strongly performing potential alternatives in relation to the water SA theme.

Conclusions

Overview of opportunities and sensitivity hotspots

The appraisal has found that the majority of shortlisted sites have no notable sensitivity in relation to the majority of SA themes and development would generally be unlikely to result in significant effects.

A number of the shortlisted sites were found to perform reasonably strongly in relation to access to local services and facilities within village clusters, particularly in relation to supporting walking access to at least a primary school.

Of particular note is the strong performance of shortlisted sites **SN0432REVA** and **SN0432REVB** at Brooke in terms of sustainable access to both local services *and* higher-tier goods, services, employment and transport options as the settlement supports a good range of local services within the settlement and convenient sustainable access to nearby Poringland.

Conversely, a small number of shortlisted sites were found to have particular sensitivity in relation to one or more SA themes. For example, shortlisted sites **SN4015** and **SN4017** at Burgh St Peter perform notably poorly in relation to the socio-economic themes of Accessibility, Economy and Transport on the basis that are furthest from many essential services, distant from employment opportunities and have poor public transport connectivity, likely embedding car dependency into new development. At Little Melton, shortlisted sites **SN0488** and **SN4052** stand out on the basis they whilst they perform strongly in relation to the socio-economic themes, they have potentially more significant landscape sensitivity in relation to the South Norwich Bypass Landscape Sensitivity Zone. Elsewhere, the large 7.1ha shortlisted site **SN0414** at Haddiscoe appears to have potential for sensitivity largely based on its scale as development of the site in full would likely have an adverse effect on the settling of the Broads National Park and would also take a significant amount of land out of productive agricultural use. However, it is recognised that in practice development would likely come forward on only a proportion of the site.

As with all of the village cluster appraisals, it is important to note that these findings should be seen in the context of the merits of sites at a district-wide scale, i.e. that strongly performing sites in this fourth tranche of village clusters may not necessarily be the most strongly performing in relation to other sites across the district as a whole.

Shortlisted site performance in relation to omission sites

In general, it is concluded that the shortlisted sites perform well in relation to the omission sites. The appraisal finds that under the majority of SA themes the shortlisted sites demonstrate equal or stronger performance to the omission sites, or that it is not possible to meaningfully differentiate between the shortlisted and omission sites at such a granular level (e.g. in relation to 'Climate change mitigation').

However, there are a limited number of exceptions to this under the 'Biodiversity', 'Historic environment', 'Land and soil' and 'Landscape' themes under which the appraisal found that some shortlisted sites performed less strongly than some omission sites within the same village cluster. These findings are discussed under the respective SA themes.

VHCAP preferred sites appraisal

Fifth tranche of village clusters

March 2021

Introduction

This appraisal focuses on sites in the **fifth** tranche of village clusters. This follows an appraisal of the first four tranches of village clusters between November 2020 and February 2021.

The fifth tranche comprises the following 12 village clusters:

- · Alburgh and Denton;
- Bawbugh;
- Earsham;
- Forncett St Mary and Forncett St Peter;
- · Gillingham, Geldeston, and Stockton;
- Hales and Heckingham, Langley Street, Carleton St Peter, Claxton, Raveningham and Sisland;
- · Morley and Deopham;
- · Needham, Brockdish, Starston and Wortwell;
- · Saxlingham Nethergate;
- · Spooner Row and Suton;
- · Thurlton and Norton Subcourse;
- · Wreningham, Ashwellthorpe and Fundenhall

However, it is important to note that the village clusters of Alburgh and Denton, of Forncett St Mary and Forncett St Peter, and of Morley and Deopham contain no shortlisted sites and are therefore not discussed through this appraisal. At least one shortlisted site is identified at each of the remaining nine village clusters.

Methodology

As with the previous four village cluster site appraisals, this fifth appraisal takes the form of a narrative discussion under each of the SA topic headings. The discussion again focusses on 'stand-out' sites in relation to each theme, i.e. those sites which are notably strongly or weakly performing and warrant more detailed attention. Where the potential for a shortlisted site to perform weakly is identified, the omission sites are reviewed for potential stronger performing alternatives elsewhere in the respective village cluster.

The appraisal is based on a detailed review of AECOM's quantitative GIS distance analysis and WebGIS tool, with more qualitative judgements added in relation to specific 'stand-out' sites which warrant more detailed analysis.

As previously, each SA theme is discussed in a silo, i.e. with no consideration of a site's performance in relation to the other themes (except where there are clear overlaps/synergies between themes). No weight is ascribed to each of the themes – it will be for the decision maker to determine the degree of weight when balancing constraints and opportunities at each site.

As previously, it is again important to reiterate that this output is therefore a decision-making tool, rather than one which is making those decisions. It is intended that these findings, along with other evidence base documents, help to inform the decision-making process.

Appraisal findings

Accessibility

Shortlisted sites

Looking first at accessibility to local services within a village cluster, many of the shortlisted sites perform strongly in relation to accessibility to primary schools. A small number stand out as exceptionally well placed for sustainable primary school access, at less than 100m distance. At Spooner Row, shortlisted sites **SN0567** and **SN2082** are around 30m and 65m respectively from the village primary school, whilst **SN0478** at Gillingham is near-adjacent to the village school, albeit that the school's constrained location at the end of a narrow residential street may require a more circuitous route between the two. At Earsham, **SN0390** is around 35m from the village primary school.

Several more shortlisted sites appear well placed to support convenient walking or cycling access to a primary school with the following all located within 200m distance:

- SN0002SL (115m) and SN4053 (130m) at Bawburgh;
- SN0274REVA (165m) and SN0274REVB (130m) at Gillingham;
- SN2183 (130m) at Wreningham;

However, a number of sites are relatively distant from a primary school and would not support convenient walking or cycling access. Of these, site **SN4069SL** at Brockdish stands out as notably poorly performing, as it is nearly 5km from the nearest primary school. A further three sites are around 2.5km from their nearest school, namely **SN0017SL** and **SN0242** at Ashwellthorpe, and **SN0308** at Hales.

In terms of access to primary healthcare, none of the shortlisted sites are close enough to a GP to provide convenient walking access, though **SN0390** at Earsham is around 1.2km from Bungay Medical Centre which equates to around a ten minute cycle, a distance which may be sufficient to support cycle access for some service users.

Few of the shortlisted sites are well served by a local village store, suggesting that at many sites development could embed a degree of car dependency for access to many day-to-day services. The following shortlisted sites are the only two to be within convenient walking distance of their respective village store (distances approximate):

- Hales: SN0308 (around 350m);
- Thurlton: SN0149 (around 150m);

Additionally, sites **SN0274REVA**, **SN0274REVB** and **SN0478** at Gillingham are within a short distance of the convenience store at the Norwich Road services, though there is no apparent pedestrian access from Gillingham at present.

All other shortlisted sites appear distant from local retail and unlikely to support walking or cycling access within their respective village cluster and perform poorly in this regard.

In terms of access to higher tier services and facilities at larger villages and towns, the majority of shortlisted sites are unlikely to be close enough to larger centres to support safe and convenient walking or cycling access, with the possible exception of sites **SN0274REVA**, **SN0274REVB** and **SN0478** at Gillingham which are all around 2.5km, or a 10+ minute cycle, from town centre services at nearby Beccles. Cycle access would be via the local road of Gillingham Dam which has good visibility and primarily only serves local traffic. Similarly, sites **SN0218** and **SN0390** at Earsham are around a 2.5km cycle on local roads to central Bungay which may support cycle access for some users, though it would be too far to support pedestrian access and **SN0308** at Hales is a similar distance to the facilities/services in Loddon.

Elsewhere, it is noted that shortlisted site **SN2065REV** at Needham is around a 1.5km/five minute cycle from Harleston town centre. However, the route would be via a busy road which crosses a high trafficked roundabout junction with the A143 and as such may not be appealing to cyclists.

In terms of public transport accessibility, shortlisted sites **SN0274REVA**, **SN0274REVB** and **SN0478** at Gillingham stand as clear strongest performers, served by multiple services per hour throughout the day for the 5-10 minute journey to town centre services at Beccles. This is considered to be sufficient to support quick, convenient access to the range of goods, facilities, employment and transport options at Beccles.

A large number of sites appear to be served by public transport services several times a day, though less than hourly in frequency which may not represent a convenient alternative to private car for many users. **SN0308** at Hales is served by buses to Loddon village centre, a journey of around 10 minutes with several services a day. Similarly, **SN4069SL** at Brockdish and **SN2065REV** at Needham are served by buses to nearby Harleston town centre several times a day, a journey of around 5-15 minutes. Sites **SN0218** and **SN0390** at Earsham are similarly served by public transport, with services to Bungay town centre taking around 5-10 minutes several times a day.

Sites **SN0567**, **SN2085** and **SN0444** at Spooner Row stand out as unusual in the context of the village clusters for being served by a train station within the village. Spooner Row station offers services to Wymondham and Attleborough via Greater Anglia, though currently there are few services per day. Nevertheless, the settlement also performs well in relation to bus services, with multiple busses per day to both Wymondham and Attleborough (both around 30 mins) providing accessibility to a wide range of higher tier services.

However, at the remaining tranche 5 village clusters public transport services to higher tier settlements appear either slow, infrequent or both. Of particular note is shortlisted site **SN4007SL** at Saxlingham Nethergate which is distant from higher tier services at Loddon or Long Stratton, with poor public transport connectivity to both; although there are several services each day to/from Norwich.

Overall, it is apparent that shortlisted sites at Gillingham stand out as strongly performing in relation to accessibility both within their cluster and beyond. Site **SN0149** at Thurlton performs strongest in relation to access to local services within the cluster, though is poor in relation to higher tier services. Sites at several other clusters appear to perform broadly on a par with one another in relation to accessibility, with limited access to local services and fast but infrequent access to higher tier services via public transport.

Shortlisted site **SN4007SL**:at Saxlingham Nethergate stands out as particularly weakly performing in relation to both local and higher tier services.

Additionally, **SN0002SL** and **SN4053** at Bawburgh are potentially within reasonable cycling distance of services at Bowthorpe within the Norwich urban area, though in practice the narrow, rural nature of New Road which links the settlements may deter some cyclist.

Omission sites

The strongly performing omission sites appear to be generally in the same village clusters as the strongly performing shortlisted sites. For example, there are several omission sites in the Spooner Row and Suton village cluster which are within a 5 to 10 minute walk of the village primary school. However, the shortlisted sites in this cluster all benefit from the same degree of accessibility and are therefore not out-performed by the omission sites.

In terms of external accessibility to higher tier services at larger settlements, none of the omission sites appear to perform more strongly than the shortlisted sites in the context of their respective clusters.

Biodiversity

Shortlisted sites

The majority of shortlisted sites perform strongly in relation to both nationally designated and internationally designated sites. All but four of the shortlisted sites have no sensitivity in relation to the district's international designations (i.e. Special Areas of Conservation, Special Protection Areas and Ramsar sites), and all but three shortlisted sites are distant from the district's national designations (i.e. Sites of Special Scientific Interest, National Nature Reserves and designated Ancient Woodland).

First, shortlisted sites **SN0274REVA**, **SN0274REVB** and **SN0478** at Gillingham and **SN0437** at Geldeston are all under 1km from the overlapping international designations of the Broadland Special Protection Area (SPA) and The Broads Special Area of Conservation (SAC) and Ramsar Site. Of these, **SN0437** stands out as both the closest site (around 700m) and the only one located upstream of the wetland area captured by the overlapping designations. This suggests it could have greatest potential for adverse effects via runoff into the Main Run culvert, which flows through and past the designated sites via Geldeston Dyke.

Turning to national scale designations, shortlisted sites **SN0017SL** and **SN0242** at Ashwellthorpe both fall within around 250m of the large Lower Wood Site of Special Scientific Interest (SSSI), which is also designated as Ancient Woodland. This close proximity could theoretically have some potential for effects via increased recreational pressure on the woodland. However, both sites are relatively small, with a combined area of 0.9ha. The Impact Risk Zone around the Lower Wood SSSI only requires developments of 100 or more units to consult with Natural England first, suggesting that development at either – or both – of the shortlisted sites would not be of a large enough scale to give rise to negative effects.

At Geldeston, shortlisted site **SN0437** is around 700m from the Geldeston Meadows SSSI. This is sufficiently close to the SSSI for the Impact Risk Zone to extend to any residential development of 50 or more units. However, the site is only 0.8ha and is very unlikely to support growth of this scale. Therefore, no significant effects are anticipated.

At the local scale, a number of sites fall within a short walk of a County Wildlife Site (CWS). The following are all under 400m from a CWS, i.e. a comfortable 5-10 minute walk:

- SN4069SL at Brockdish (120m)
- SN2183 at Wreningham (210m)
- SN2065REV at Needham (230m)
- **SN0437** at Geldeston (275m)
- SN0002SL and SN0453 at Bawburgh (360m and 380m)

However, the CWS of concern in relation to all but one of these sites are on private land and have no public access, suggesting no risk of increased recreational pressure. The one exception is site **SN2065REV** at Needham, which is close to the St Peter's Meadow CWS, where a public right of way runs directly through the CWS. There could be some very limited potential for adverse effects via activities such as increased trampling and dog walking.

Overall, it appears that the only shortlisted site with any notable potential for adverse effects is **SN0437** at Geldeston on the basis that it is both close to and upstream of the Broadland SAC and the Broads SPA and Ramsar site. There may be some potential for harm via runoff into watercourses which flow through the wetlands within the designated sites.

Omission sites

In light of the above, there is potential to identify a more strongly performing omission site elsewhere in the Gillingham, Geldeston, and Stockton cluster, though not within Geldeston itself. Omission site **SN0021SL** at Gillingham is around 1.3km from the SPA/SAC/Ramsar site, whilst omission site **SN0091** at Stockton performs stronger still, at around 2.2km in distance and with no apparent potential for adverse effects in relation to biodiversity designations at any scale.

Climate change adaptation

Shortlisted sites

A majority of the shortlisted sites perform very strongly in relation to fluvial flood risk as they are located entirely within Flood Zone 1, i.e. the lowest level of fluvial flood risk.

However, five shortlisted sites intersect to some extent with Flood Zone (FZ) 2 or 3. Of these, Site **SN0274REVA** and **SN0274REVB** at Gillingham stand out as clear weakest performers. Both are around 60% within FZ3 and are constrained further by the pattern of flood risk within each site, i.e. the area risk lies between the site access and the dry island. It may be challenging to deliver a site layout which achieves a viable scale of development whilst directing development away from the area of risk and achieving safe site access. This is particularly the case at **SN0274REVA** at which an additional 25% of the site falls within FZ2, meaning only 15% of the site is outside FZ 2 or 3

The remaining three sites with some sensitivity in relation to fluvial flood risk are **SN0390** at Earsham (25% FZ 2 or 3), **SN0444** at Spooner Row (21% FZ 2 or 3) and **SN2065REV** at Needham (10% FZ 2 or 3).

Turning to surface water flood risk, shortlisted site **SN2183** at Wreningham is most affected, both in terms of extent and severity of risk. Nearly 50% of the site has some level of surface water flood risk, with about half this falling within an area of 'high' risk, i.e. a greater than 3.3% chance of flooding per annum.

Elsewhere, no other shortlisted site is affected across more than 25% of its area by surface water flood risk, of which no more than 6% is high risk. Significant effects are not anticipated at these sites and it is considered this level of risk could likely be mitigated through solutions delivered through the development process, such as SUDS and areas of open space.

The majority of the remaining shortlisted sites are affected across no more than 5% of their surface area, suggesting that there is little development constraint as such limited areas of risk could be incorporated into open space through site design and layout as necessary.

In terms of the other key aspect to climate change adaptation, namely adapting to a warming climate through incorporating cooling features in new development, there is little to meaningfully differentiate between the shortlisted sites at this stage.

Overall, it is evident that the clear weakest performing shortlisted sites in relation to climate change adaptation are **SN0274REVA** and **SN0274REVB** at Gillingham which are significant constrained by Flood Zone 3. Any development proposals on site may need to pass both the exception and sequential tests.

Omission sites

In light of the above it is notable that each of the four omission sites in the Gillingham, Geldeston, and Stockton village cluster performs significant more strongly than the shortlisted sites discussed above. The single omission site in Gillingham itself is **SN0021SL**, which is around 10% within FZ2 and at no surface water flood risk. The omission sites **SN0707S** and **SN1004SL** in Geldeston and **SN0091** in Stockton are each entirely free of flood risk from all sources.

Climate change mitigation

Shortlisted sites

There is limited opportunity to appraise or differentiate between the shortlisted sites in relation to climate change mitigation at this stage. In terms of reducing emissions from the built environment, it is generally the case that large sites – particularly those of a strategic scale of several hundred dwellings or more – offer potential to incorporate innovative low-emissions energy generation processes such as ground source heat pumps and district heat networks. However, such features are generally not possible to deliver at a non-strategic scale and allocations through the VCHAP are unlikely to present opportunities to do so. At the scale of individual buildings, it is possible to achieve high standards of energy efficiency in new development through design and construction methods. However, these considerations are detailed in nature and do not have a spatial dimension to them, meaning they do not offer a way to meaningfully differentiate between the shortlisted sites – all sites have the same theoretical potential to incorporate energy efficiency measures.

In terms of emissions from transport sources, there are natural synergies with the SA themes of Accessibility and of Transport, as the aim of delivering development with low car dependency will support the SA objective of reducing CO₂ emissions from all sources. On this basis, the findings in relation to Accessibility are considered to also apply in relation to reducing emissions from transport sources, namely that sites SN0274REVA, SN0274REVB and SN0478 at Gillingham stand out as supporting sustainable access to a range of local facilities as well as higher tier services at Beccles and perform most strongly in terms of minimising car dependency. Site SN4007SL at Saxlingham Nethergate stands out as embedding high car dependency for access to a range of local and higher tier services.

Omission sites

Poorly performing shortlisted sites are not found to be outperformed by omission sites in relation to climate change mitigation on the basis that omission sites are broadly a similar distance from services and would embed a similar degree of car dependency as the respective shortlisted sites at each cluster. Therefore, there is no potential to review the omission sites for more strongly performing alternatives.

Communities

Shortlisted sites

Securing new community infrastructure through the development process can help protect and enhance the provision of local services, narrow the deprivation gap and narrow the gap between health and wellbeing outcomes within the district. Therefore, it will be important to maximise opportunities to secure such infrastructure where possible.

However, the specific site at which development comes forward may be less important to achieving this outcome than the settlement or cluster in which that site is located. This is because in small settlements, shortfalls in community infrastructure are likely to affect a settlement as a whole, rather than be localised to a specific site. Similarly, divergences in health and deprivation outcomes are unlikely to be pronounced at a localised scale, as they reflect more macro factors. This suggests that opportunities to differentiate between individual sites within a cluster are limited.

On this basis it is considered that there is limited opportunity to appraise site-specific performance of the shortlisted sites in relation to the communities SA theme.

Omission sites

A review of relative deprivation within the tranche 5 village clusters reveals that there is no meaningful opportunity to differentiate between the shortlisted sites and the omission sites. Omission sites within each village cluster are at locations ranked at a similar level as shortlisted sites on the Index of Multiple Deprivation (IMD), suggesting that there would be no clear opportunity to target growth at locations where planning gain may have a greater positive impact.

Overall, it is not possible to review the omission sites for more strongly performing potential alternatives to the shortlisted sites.

Economy

Shortlisted sites

None of the shortlisted sites are close enough to an existing or allocated employment site to support pedestrian access, though the following are considered within reasonable cycling access:

- SN2183 at Wreningham (around 1.2km from the Hethel Engineering Centre and associated employers);
- SN0308 at Hales (around 1.2km from employment sites on Beccles Road, Loddon);
- SN2065REV at Needham (around 1.3km from employment sites off the A143 at Harleston).

Additionally, it is recognised that **SN0002SL** and **SN4053** at Bawburgh are potentially within reasonable cycling distance of a Norwich Research Park (NRP) employment allocation at Colney, adjacent to the Norfolk and Norwich University Hospital. However, the route includes the busy and complex junction between the B1108 and Norwich Southern Bypass which is unlikely to be appealing to cyclists. The Bawburgh sites are also within a reasonable cycling distance of the Bowthorpe Employment Area in Norwich City and the Longwater Employment Area at Costessey, although again the cycling routes, with route to the former being shown as a 'Neighbourhood Route' on the Norwich Cycling Map.

Elsewhere, as noted through the Accessibility discussion above, a number of sites support some degree of public transport access to higher tier settlements at which a wider range of employment options and onward-commuting options are available. Of these, the only shortlisted sites from which public transport is regular enough to be a convenient commuting option are **SN0274REVA**, **SN0274REVB** and **SN0478** at Gillingham and **SN0567**, **SN2085** and **SN0444** at Spooner Row.

Elsewhere, the remaining shortlisted sites are either insufficiently served by convenient public transport to support convenient commuting, or are significantly more distant from employment sites and from town centre employment opportunities.

Omission sites

There do not appear to be any stand out omission sites with potential to out-perform the shortlisted sites in terms of supporting sustainable access to employment opportunities at the district's existing or allocated employment hubs.

Historic environment

Shortlisted sites

Four shortlisted sites are located within or adjacent to a conservation area, suggesting that development could have some potential to give rise to negative effects in relation to the historic environment. These sites are:

- **SN002SL** at Bawburgh (100% within the Bawburgh conservation area);
- SN4053 at Bawburgh (adjacent to the Bawburgh conservation area);
- SN4069SL at Brockdish (adjacent to the Brockdish conservation area);
- SN0437 at Geldeston (adjacent to the Geldeston conservation area).

Of these four, **SN0437** at Geldeston appears to have only limited potential for harm. It is adjacent to the 20th century 'Kells estate' part of the conservation area, though a recently completed 21st century development is immediately adjacent as well and is considered to impart greater influence over the character of the shortlisted site. Similarly, shortlisted site **SN4069SL** at Brockdish is small in relation to the conservation area and outside the historic core of the village centre, albeit this is only a short distance away.

The two shortlisted sites at Bawburgh – adjacent to one another – have greater potential for effects on a conservation area, though notable harm is considered unlikely. Although the sites are within/adjacent to the conservation area, the immediate character of the area is under greater influence from more modern structures at The Warren and along Stocks Hill. Development at **SN4053** specifically could have some potential to alter the rural setting of the Bawburgh conservation area, though in practice it is considered that this could be mitigated through detailed matters of design and layout and that existing development already limits the extent to which the site contributes to the village's rural setting.

It is noted that both shortlisted sites at Bawburgh are also in close proximity to the Bawburgh Bridge Scheduled Monument, which is around 150-175m from the sites. However, in practice it appears that sensitivity in relation to the bridge is very low given the lack of direct sightlines and the presence of existing development between the two.

None of the other shortlisted sites have any sensitivity in relation to a scheduled monument. Similarly, none of the shortlisted sites have any sensitivity in relation to a registered park and garden.

However, a number of shortlisted sites are in close proximity to one or more listed buildings and these warrant closer attention. Looking first at higher grades, site **SN2065REV** at Needham stands out as closest to a Grade I listed building, lying around 150m from the Church of St Peter in the village. The existing linear settlement pattern at Needham is considered to make an important contribution to the character of the listed building and its setting, as it helps frame the church in its wider landscape context. Development at **SN2065REV** is likely to diverge from this settlement pattern and could alter the way in which the church is perceived within the landscape as well as urbanise views out from the church to the west. At Earsham, shortlisted site **SN0390** is around 205m from the Grade I listed Church of All Saints. Planted field boundaries and a small number of existing structures help screen direct sightlines between the site and the church, though it is considered that there could be potential for cumulative harm to the setting of the church when development is considered in combination with the effect of recent nearby completions of several dwellings along School Road, particularly at allocation EAR1 of the Site Specific Allocations and Policies Document.

Only one of the shortlisted sites appears to warrant closer attention in relation to effects on a Grade II* listed building, namely **SN2183** at Wreningham which is around 100m from the Grade II* listed Poplars and could fall within the building's setting. In practice, thick planted screening along the property boundary north of the building appears to limit the extent of its setting, and it is considered that there could be potential to mitigate visual effects further through the development process, such as via sensitive boundary treatment.

A number of shortlisted sites fall within 100m of a Grade II listed building, with sites **SN4069SL** at Brockdish and **SN0390** at Earsham standing out as very close, at 19m distance and 29m distance respectively. It is considered that both sites fall within the immediate setting of their respective listed building, with **SN4069SL** having potential to alter the character of the immediate area of White House Famhouse, and **SN0390** having the potential to substantially urbanise the rural setting of the The Close.

Shortlisted sites in Spooner Row, Hale and Ashwellthorpe all stand out as performing well in relation to the historic environment as all appear largely free of built heritage constraints.

Overall, it appears the greatest potential for some degree of harm to a designated historic asset would arise at **SN2065REV** at Needham, **SN4069SL** at Brockdish and **SN0390** at Earsham.

Omission sites

A review of the omission sites in light of the above identifies that neither omission site in Needham has materially less sensitivity in relation to the Church of St Peter as both are within 30m of the church and in its immediate setting. In Brockdish, however, omission site **SN0385** is away from the conservation area and has no notable sensitivity in relation to the village's listed buildings and therefore appears to perform more strongly than shortlisted site **SN4069SL** in respect of the historic environment. There are no omission sites in Earsham and so it is not possible to find a more strongly performing alternative to shortlisted site **SN0390** within the village cluster.

Housing

Shortlisted sites

As identified in the previous appraisals of village cluster sites, housing delivery is a strategic issue in the sense that:

- the minimum overall quantum of growth to be delivered through the VCHAP (i.e. 1,200 homes) is set by the emerging Greater Norwich Local Plan (GNLP); and,
- the preferred spatial strategy underpinning distribution of this growth via the VCHAP will be determined at a
 district-wide scale based on all the available evidence, some of which is still emerging.

In this context, it is assumed that at a district-wide scale there will be sufficient sites to deliver the VCHAP's overall target of 1,200 dwellings and that meeting this target will not rest on the performance of any one specific site. Therefore, for the purposes of this appraisal, attention at a site-specific scale is focussed on the degree to which the shortlisted sites could support a range of different types and tenures of housing to achieve a broad housing mix.

The key determinant of this is likely to be site capacity, as the larger the scheme the greater the potential to deliver a range of housing types and tenures, including affordable housing. The supporting text of Policy DM 3.1 (Meeting housing requirements and needs) of the 2015 DM Policies Document says that the Council will seek affordable

housing on all developments of 5 or more dwellings or at sites of 0.2ha or more; although this was subsequently superseded by the thresholds for 'major development' in the National Planning Policy Framework .

Most of the shortlisted sites are still above the major development thresholds, meaning that they should theoretically all have potential to deliver some degree of affordable housing on site. In practice, it is likely that it will not be viable to deliver full policy-compliance at the smallest sites; although this is being tested through the joint viability work being undertaken for the Greater Norwich Local Plan and the VCHAP. It will therefore be important that the larger sites maximise their potential to deliver a range of affordable tenures where possible.

Several of the shortlisted sites are smaller than 1ha suggesting they may have an increased risk of under-delivering affordable housing versus the policy requirement once yields are reduced to incorporate considerations such as open space, access and landscaping. Of these, three sites – **SN0017SL** at Ashwellthorpe, **SN0002SL** at Bawburgh and **SN0529SL** at SN4069SL at Brockdish - are smaller than 0.2ha and stand out as particularly at risk of on-site affordable under delivery. However, these are each in village clusters at which larger site options are also shortlisted, suggesting there is no notable risk at a settlement or cluster scale.

Elsewhere, it is considered the range of site sizes across and within the remaining shortlisted sites is sufficient to help achieve policy compliant delivery of affordable housing where viable and a good housing mix more broadly.

On this basis, the majority of shortlisted sites are considered to perform strongly in relation to the housing SA theme.

Omission sites

It is recognised that several omission sites with greater indicative capacities are available in each of the settlements where the very smallest shortlisted sites are identified. However, the overall performance of the shortlisted sites in relation to the housing SA theme coupled with the strategic nature of many strands of housing delivery suggests the omission sites are unlikely to represent materially stronger alternatives. This is on the basis that the collective potential to deliver a range of types and tenures of housing across the village clusters is likely to be robust overall.

Land and soils

Shortlisted sites

The national Natural England dataset indicates that all but two of the shortlisted sites are underlain by either Grade 2 or Grade 3 agricultural land. Although this dataset is at a low resolution, it nonetheless indicates that the majority of shortlisted sites have potential to be underlain by 'best and most versatile' (BMV) agricultural land, the loss of which should be avoided if poorer quality land is available. One shortlisted site – **SN0478** at Gillingham – stands out as having particular sensitivity on the basis that it is underlain entirely by Grade 2 land.

The majority of the remaining sites are all underlain by Grade 3 land. It is not possible to determine whether this is 3a, i.e BMV land, or 3b, which is poorer quality and so the land's potential to be BMV is recognised at this stage.

Two sites stand out as more strongly performing on the basis that they are majority underlain by poorer quality land, namely **SN0149** at Thurlton (83% Grade 4 land) and **SN0002SL** at Bawburgh (65% Grade 4 land).

There do not appear to be any strong stand out shortlisted sites in respect of land use, as all appear to be greenfield sites at present. There is some limited potential to differentiate on the basis of site size, as the larger agricultural sites could take a greater quantity of land out of productive land out of agricultural use, suggesting a weaker performance overall in relation to land and soils. However, even the largest site in tranche 5 (**SN0444** at Spooner Row) is relatively small at 3.6ha and significant negative effects are not anticipated at any of the shortlisted sites.

There is also a need to consider impacts on winnable minerals deposits in order to avoid the sterilisation of minerals. However, it is not possible to differentiate between the shortlisted sites in this regard.

Omission sites

The majority of omission sites are broadly on a par with the shortlisted sites in terms of land quality, as land quality at omission sites generally echoes that of the shortlisted sites in the same cluster. All four omission sites in the Gillingham, Geldeston and Stockton village cluster are an exception to this, as all omission sites are underlain by Grade 3 rather than Grade 2 land, though in practice detailed survey data would be required to understand whether this is 3a or 3b land.

There do not appear to be any majority-brownfield omission sites among the tranche 5 village clusters meaning there is no opportunity to identify more strongly performing omission sites in relation to land use.

Landscape

Shortlisted sites

A number of the tranche 5 shortlisted sites appear to have some potential landscape sensitivity, either in relation to the Broads National Park or to local landscape designations.

Turning first to the National Park, a total of seven shortlisted sites fall within around 500m of the National Park boundary, suggesting that development could have some potential to affect the landscape setting and character of the Broads. However, at SN0149 at Thurlton, as well as SN0390 and SN0218 at Earsham, the existing built area of the settlements lie between the sites and the Park and will mitigate the effects of new development. At Gillingham, shortlisted sites SN0274REVA and SN0274REVB are also screened by the existing built area of the settlement, though SN0478 at Gillingham could have greater sensitivity by virtue of clearer sightlines to the Park, which is around 200m to the south. Site SN0437 at Geldeston is closest to the Park at around 180m, though it too is screened to an extent by a recently completed development adjacent to the south of the site.

In light of the above, significant effects on the landscape quality and character of the National Park are not anticipated at any of the shortlisted sites.

With regard to local landscape designations, several shortlisted sites intersect with an identified River Valley and/or with the Norwich Southern Bypass Landscape Protection Zone (NSBLPZ) and have potential localised sensitivity as a result.

First, the following five sites are entirely within a designated River Valley:

- SN0218 and SN0390 at Earsham;
- SN2065REV at Needham;
- SN4069SL at Brockdish;
- SN0437 at Geldeston.

Of these, **SN0390** at Earsham is considered to have the greatest sensitivity, on the basis that it is an expansive, open field at the eastern periphery of the village which helps frame the village within the landscape, contributing to its landscape setting and character. At the other four shortlisted sites, all relate more naturally to their respective settlement's existing built form and are less intrusive into the surrounding River Valley.

Additionally, at Bawburgh shortlisted site **SN4053** is 100% within the NSBLPZ, whilst a second site – **SN0002SL** – is around 50% within the NSBLPZ. The purpose of the designation 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" (as per Policy 4.6 of the adopted DM Policies Document, 2015). Development within the NSBLPZ therefore has implicit potential to undermine or erode Norwich's landscape setting.

Despite this, it is considered that the sensitivity on the ground is mitigated to an extent by the form of the settlement, which sees the site occupy a 'notch' in the existing built form, framed by development to the west, north and south. Additionally, the distance from the bypass itself along with established planted screening along the verges of the bypass help minimise visual accessibility further. There is potential for some degree of adverse effects from development, though these are likely to minor in nature, and are anticipated to be negligible with suitable boundary treatment at the sites

None of the shortlisted sites have any sensitivity in relation long range viewing cones to Norwich or in relation to the designated Strategic Gaps.

Overall, the shortlisted sites perform broadly well in relation to landscape, with those sites which stand out as being within, or in close proximity to, a landscape designation generally found to have low potential for adverse effects in practice. However, site **SN0390** at Earsham is considered to be an exception based on its openness, its scale in relation to the existing built area of the settlement and the fact it falls entirely within the designated Waveney River Valley.

Omission sites

On the basis that the shortlisted site with greatest potential for adverse landscape effects is identified at Earsham, it is not possible to identify a better performing alternative within the village cluster as there are no omission sites at the Earsham cluster.

Elsewhere, all omission sites at Bawburgh are also entirely within the NSBLPZ and consequently do not out perform the shortlisted sites at the village cluster.

Shortlisted sites identified as having some limited potential for less than significant effects in relation to the National Park are found to perform broadly on a par with omission sites in the same village clusters on the basis of their similar proximities to the Park and relationship with its setting.

Transport

Shortlisted sites

There are strong synergies between the Transport SA theme and the Accessibility SA theme discussed above, as both seek to recognise and prioritise the use of sustainable modes of transport where possible. On this basis, the findings in relation to the shortlisted sites' potential to support walking, cycling and public transport use are considered to apply here as well. The key findings are that shortlisted sites at Gillingham (i.e. SN0274REVA, SN0274REVB and SN0478) perform most strongly by virtue of supporting access to services via sustainable modes of travel both within Gillingham itself and to nearby Beccles, whilst shortlisted site SN4005 at Saxlingham Nethergate performs notably poorly.

Separately, there is a need to recognise that the limited nature of service provision at small settlements will likely mean that some needs continue to be met via private vehicle where it is not practical or possible to do so via sustainable travel modes. This focusses attention on locations at which new development could lead to additional queuing traffic at pinch points or bottlenecks, with associated effects on both air quality and travel times.

In general it appears unlikely for significant additional traffic flows to result from development proposed through the VCHAP. There could be some theoretical potential for additional queuing traffic at pinch points or junctions within settlements should all shortlisted sites within a settlement be taken forward, with associated potential for increased emissions from queuing traffic. However, none of the tranche 5 sites are considered large enough to have meaningful potential for such an effect, either individually or cumulatively.

None of the shortlisted sites will have an effect on an Air Quality Management Area (AQMA).

Omission sites

There do not appear to be any stand-out omission sites in each cluster which outperform the respective shortlisted sites. This reflects the fact that sustainable transport connectivity is broadly consistent within each rural settlement, and no one site measurably outperforms another in terms of minimising reliance of private vehicles.

Water

Shortlisted sites

There is a need to ensure that new development helps minimise pressure on the district's water resources and maintains and enhances the quality of the district's rivers, lakes and other waterbodies. However, in spatial terms this is likely to be best addressed at a strategic scale, i.e. directing growth away from areas of particular sensitivity in relation to issues such as water stress. At a site-specific scale this is likely to be managed via the design of a future scheme rather than via spatial choices about alternative sites within the same settlement or same village cluster.

As such, it is considered that it is not possible to meaningfully differentiate between or appraise the performance of the shortlisted sites in relation to the water SA theme.

Omission sites

In light of the above, there is no opportunity to review the omission sites for more strongly performing potential alternatives in relation to the water SA theme.

Conclusions

Overview of opportunities and sensitivity hotspots

The most notable finding in relation from the tranche 5 village cluster site appraisals is the contrasting performance of shortlisted sites at Gillingham, namely SN0274REVA, SN0274REVB and SN0478. 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, as SN0274REVA and SN0274REVB are up to 85% within fluvial Flood Zones 2 and 3, whilst SN0478 is the only site in tranche 5 to be entirely underlain by high quality 'best and most versatile' Grade 2 agricultural land.

Elsewhere, it is apparent that although several shortlisted sites support good sustainable access to a local primary school, there are generally few local retail options within the tranche 5 clusters and many needs will need to be met at higher tier settlements. In light of this, sites at Spooner Row appear best placed to support sustainable access to higher tier settlements, as the village is well served by buses and is the only village cluster in tranche 5 to have a railway station as well.

There are few notable sensitivities in relation the district's wide range of biodiversity designations, though site **SN0437** at Geldeston is a potential exception in by virtue of proximity to and upstream location from the Broads Special Area of Conservation and Ramsar site.

Shortlisted site performance in relation to omission sites

In general, it is concluded that the shortlisted sites perform well in relation to the omission sites. The appraisal finds that under the majority of SA themes the shortlisted sites demonstrate equal or stronger performance to the omission sites, or that it is not possible to meaningfully differentiate between the shortlisted and omission sites at such a granular level (e.g. in relation to 'Climate change mitigation').

However, there are a limited number of exceptions to this under the 'biodiversity, 'climate change adaptation' and 'historic environment themes under which the appraisal has found that some shortlisted sites perform less strongly than omission sites within the same village cluster. These findings are discussed under the respective SA themes.