

Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan 2018 - 2038

Note in response to Inspectors' questions relating
to the SA of reasonable alternative sites:
Addendum to the Regulation 19 SA/SEA Report

June 2022



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY



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1 Introduction

1.1 Purpose of this document

- 1.1.1 This document provides information on the sustainability appraisal (SA) of potential development sites. It has been prepared at the request of the Inspector during the Examination in Public (EiP) Part 1 Hearings.
- 1.1.2 It summarises the site-specific issues raised in representations made in writing or in person at the EiP Part 1 Hearings, regarding Matter 1 'Compliance with statutory procedures and legal matters' Issue 2: *Does the Sustainability Appraisal (SA) including the addendum, adequately assess the environmental, social and economic effects of the Plan in accordance with legal and national policy requirements?*
- 1.1.3 The document provides a brief response to the points explaining how the SA has dealt with the matter, and also indicates any necessary adjustments to the SA that might be warranted.
- 1.1.4 As indicated in the document, no adjustments to the SA are deemed to be necessary, other than a response (appended to the document) relating to site GNLP0352 to address changes that had been made to the promoter's proposal for the site, and relating to site GNLP0415R to address the site as one combined garden village proposal.

1.2 Overview

- 1.2.1 **Table 1** has been prepared to summarise the main site-specific issues which have been raised through representations relating to the SA, at the request of the Planning Inspector during Part 1 of the EIP Hearings, in order to provide further context and support for Part 2 of the Hearings.
- 1.2.2 The flowchart in **Figure 1** summarises the main stages of the SA process and sequencing of events that led to the preparation of the submission version of the GNLP, in addition to the main outputs from Lepus to the GNLP and inputs from the GNLP to Lepus relating to site assessment process. **Figure 2** summarises the process of site assessments carried out during the Regulation 18 and 19 stages of the SA.
- 1.2.3 **Appendix A** provides an updated SA of site GNLP0352, taking account of the changes, and as such is an addition to the SA. This reassessment indicates no change in assessment performance (post-mitigation) with the exception of SA Objective 5 (Housing) which changed from 'major positive' to 'minor positive'.
- 1.2.4 **Appendix B** provides an updated SA of site GNLP0415R, considering the entire garden village proposal at Honingham Thorpe rather than the individual site parcels which were assessed within previous SA stages. This reassessment indicates no profound change in assessment performance.
- 1.2.5 This information has been reviewed by the GNLP plan making team who consider that the original reasons for rejection remain unchanged.

2 Site-specific issues summary table

Table 1: Site-specific issues raised through representations and adjustment required to SA

#	REP NAME & ID REF	REP ID	MAIN SITE-SPECIFIC ISSUES RAISED	LEPUS COMMENT	ANY ADJUSTMENT TO SA OF SITES REQUIRED?
REGULATION 19 REPRESENTATIONS					
1	Mr Clive Boyd [19226]	23258	<p>CHEDGRAVE SITES</p> <p>Site GNLP0463R is deficient, limited capacity in services; development will impact on beautiful area and character, not wanted by villagers etc. The SA does not consider impacts on existing residents.</p>	<p>The SA considers the visual amenity of local residents via SA Objective 4 - Landscape.</p> <p>Within the pre-mitigation assessment, Site GNLP0463R was identified as having an overall minor negative impact on landscape due to potential adverse impacts on views to/from The Broads, alteration of landscape character, alteration of views experienced by users of the PRoW network and existing local residents, and the potential for urbanisation of the countryside.</p> <p>Other potential negative impacts included access to health services (e.g. hospitals with A&E departments and health services) and access to public transport within the area (SA Objectives 8 and 12).</p> <p>The post-mitigation assessment identified potential minor negative impacts would remain including on landscape relating primarily to the urbanisation of the countryside, and on transport and access to services.</p>	No
2	Noble Foods Ltd [19330]	23569	<p>MARSHAM SITES</p> <p>SA is flawed in its assessment of the sites in Marsham. GNLP3035, a previously used site, is preferable to GNLP2143, a greenfield site. GNLP2143 should have had 'major negative' scores for landscape and heritage impacts.</p>	<p>Site GNLP2143 was identified as having a minor negative impact on landscape (SA Objective 4) pre-mitigation, due to potential alteration of views experienced by PRoW users and existing local residents and increasing the risk of urbanisation of the countryside. The post-mitigation assessment determined that the negative effect due to urbanisation of the countryside would not be fully mitigated through the local plan policies.</p> <p>Site GNLP2143 was identified as having a major negative impact on cultural heritage (SA Objective 13) pre-mitigation primarily due to its location adjacent to the Grade I Listed Building 'Church of All Saints', with potential for permanent alteration of its setting and significance. In the post-mitigation assessment, a negligible impact on cultural heritage was identified following consideration of the requirements set out in Local Plan policies, particularly GNLP Policy 3, which would be expected to ensure heritage assets are conserved and enhanced in line with their significance (see R19 SA Appendix E).</p> <p>Although it is a primarily brownfield location, Site GNLP3035 was identified as having the potential for minor negative impacts on landscape (SA Objective 4) pre-mitigation due to potential impacts on views experienced by existing local residents, and a minor negative impact on cultural heritage (SA Objective 13) due to potential impacts on the setting of various Grade II Listed Buildings. The post-mitigation assessment found that these impacts would likely be mitigated</p>	No

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				<p>through implementation of policies, such as GNLP Policies 2 and 3, resulting in a negligible impact (see R19 SA Appendix E).</p> <p>The SA has applied the same methodology to all reasonable alternative sites including GNLP2143 and GNLP3035.</p> <p>It is the Councils' role to select / reject reasonable alternatives, using the findings of the SA and other evidence base documents. The SA presents the outline reasons for selection and rejection (see R19 SA Appendix G):</p> <ul style="list-style-type: none"> • Site GNLP2143 was selected "<i>This is the only site considered suitable for allocation in Marsham, other sites promoted were either too large or had significant highway constraints. It is allocated subject to vehicular access via Le Neve Road. Development will need to respect the setting of the adjacent Grade I listed church and provide an extension to the cemetery if required.</i>" • Site GNLP3035 was rejected "<i>The previously developed nature of this site is recognised but after careful consideration it is considered unreasonable for allocation as there has been a history of planning refusals in terms of access, visual impact and residential amenity. The site is not acceptable in highway terms as Fengate Lane is not of a sufficient standard to accommodate development traffic and the junction with the A140 poses a safety concern regarding the intensification of traffic accessing onto a corridor of movement. In addition the footway connection to Marsham Primary School is not continuous and it is not possible to improve this within the constraints of the highway.</i>" 	
3	CODE Development Planners Ltd (Mr Matthew Thomas, Planner) [19663]	24350	<p>HELLEDON SITES (GNLP2173 and HEL1)</p> <p>Carried forward allocations without planning permission have not been reassessed in a comparable way to possible alternative sites (eg re mitigation and evidence).</p> <p>There is inconsistency between the assessment of sites, against the identified criteria, evidence base, and the reasons for not allocating sites.</p> <p>Criteria for selecting contingency sites appears to be predicated on size, being sites for circa 800-</p>	<p>The SA has applied the same methodology to all reasonable alternative sites including GNLP2173 and HEL1. The representation does not acknowledge the post-mitigation assessment of reasonable alternative sites (Appendix E), which was undertaken prior to the assessment of site policies (Appendix F). The information within site allocation policies was not used to inform the post-mitigation scoring in the SA, as this assessment can only use information available for all reasonable alternative sites (see sequencing infographics in Figures 1 and 2).</p> <p><u>Access to / net loss of public greenspace within SA Objective 8 (health):</u> The SA has used Ordnance Survey 'open greenspace' shapefiles, which indicates that Site GNLP2173 coincides with a greenspace. It is acknowledged that this dataset may not include information regarding the current status of all greenspaces or their role in the local community. This limitation could usefully have been in the assumptions table, stating that we have assumed all OS greenspaces are accessible to the public. However, even if this specific information had been taken into account or was made available at the time of assessment, this would not have affected the overall SA performance of the site as it scored negatively due to other receptors considered within Objective 8 (primarily its location outside of the identified sustainable target distance to healthcare facilities), in line with the methodology as stated in the SA reports.</p> <p><u>Carried forward sites:</u> The carried forward Site HEL1 has been subject to the same process of assessment in the SA as every other reasonable alternative identified by the Councils. It was first assessed (pre-mitigation) in the Regulation 18C</p>	No

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			<p>1,000 homes and not speed in the delivery of new homes.</p> <p>The SA should reassess strategy and site allocation policies.</p> <p>The Site Assessment Booklets should follow and reference the SA assessment.</p> <p>Consequential amendments should be made to the policies and supporting text.</p>	<p>SA (2020). Post-mitigation information can be found in Appendix E of the Regulation 19 SA alongside GNLP2173 and all other reasonable alternative sites tested throughout the SA process.</p> <p><u>Contingency sites:</u> If a site has been identified by the Councils as a 'contingency site', this had no bearing on the way in which the site was assessed in the SA. All reasonable alternative sites have been assessed in the same way using the same methodology as set out in the SA reports. The SA is high level assessment and does not take into account information such as the potential timing of development delivery.</p>	
4	David Lock Associates (Heather Pugh, Partner) [20014]	24516	<p>The SA incorrectly assesses the Silfield Garden Village (SGV) (Site GNLP4057A) against some of the sustainability objectives and the SA could benefit from an expanded assessment of the new settlement proposals.</p>	<p>The role of SA is to compare reasonable alternatives by identifying potential positive and negative effects, in order to assist the Councils in their selection of the most sustainable options for development. The SA does not seek to identify which sites should or should not be developed, despite their potential for likely significant impacts. It is the Councils' role to use the SA findings, alongside other relevant evidence base information, to help make decisions regarding the selection or rejection of each reasonable alternative site.</p> <p>In this case, the SGV sites (GNLP4057A, GNLP4057B and GNLP4057C) are rejected by the Councils at this stage because <i>"There are currently no proposals to allocate a new settlement in the local plan, however GNLP4057 is being considered within the context of options for a new settlement in the future"</i>.</p> <p>The SA is high level and detailed assessments have not been undertaken. The SA must assess all reasonable alternative sites in the same way, based on the proposal information provided by the Council at the time of assessment. No further supplementary material was considered in the assessment of reasonable alternative sites beyond this. Submissions of evidence via representations on a single site could potentially bias SA performance and depart from the objective and comparable basis on which the methodology has been designed and operated. For this reason, they have not been factored into the SA process.</p> <p>Each SA Objective assesses different aspects of sustainability, including those which consider similar receptors in different contexts. See Chapter 4 of Regulation 19 SA for full methodology, particularly Boxes 4.1 – 4.15 which explains the receptors considered within each SA Objective.</p> <p>The representation comments particularly on the assessment of Site GNLP4057A for six SA Objectives:</p> <ul style="list-style-type: none"> • <u>SA Objective 1 (Air Quality & Noise):</u> The pre-mitigation impact was major negative due to the large scale of proposed development (6,500 homes) likely to result in a significant increase in local air pollution. The site is also within 200m of a main road and railway line, potentially further exposing site end users to higher levels of air and noise pollution and vibrations. The post-mitigation assessment of this site identified potential for 	No

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				<p>some minor negative impacts to remain, where GNLP policies would not be expected to fully mitigate these effects.</p> <ul style="list-style-type: none"> <p>SA Objective 2 (Climate Change and Mitigation): The pre-mitigation impact was major negative due to the large scale of proposed development likely to result in a significant increase in carbon emissions. The site is also located partially within Flood Zone 2 and 3a and coincides with an area of high-risk surface water flooding. Potential for a major negative effect remained in the post-mitigation assessment, as the GNLP policies would not be expected to fully mitigate the impacts of development within Flood Zone 3a. The site masterplan, surface water flood risk modelling and other site-specific studies mentioned within the rep were not considered as part of the site assessments, as the SA must apply the same methodology to all reasonable alternative sites.</p> <p>SA Objective 3 (Biodiversity and Geodiversity): The pre-mitigation impact was major negative due to the presence of ancient woodland within the site, with potential for direct adverse impacts. The site also lies adjacent to 'Bays River Meadows South' and 'Silfield Newt Reserve' County Wildlife Sites and coincides with priority habitats. The post-mitigation assessment identified a negligible impact, due to the level of protection afforded by the policies within the GNLP to these biodiversity assets.</p> <p>SA Objective 8 (Health): An overall major negative impact was identified pre-mitigation primarily due to the site's location outside of sustainable target distances to healthcare facilities. The post-mitigation assessment determined that a minor negative impact would remain, due to the expectation that GNLP policies would improve sustainable accessibility such as through public transport provision but would not fully mitigate these impacts. Even if an assumption had been made that a new GP surgery would be provided on site, this would not change the overall findings for this SA Objective post-mitigation.</p> <p>SA Objective 14 (Natural resources, waste and contaminated land): The pre-mitigation impact was major negative due to the large scale of proposed development likely to result in a significant increase in household waste generation, and the potential loss of over 20ha of BMV soils (in line with Natural England guidance). The post-mitigation assessment identified the potential for minor negative impacts on natural resources within the Plan area, where GNLP policies were not expected to fully mitigate these impacts.</p> <p>SA Objective 15 (Water): The pre-mitigation impact was minor negative due to potential pollution of groundwater and surface water receptors as the site coincides with SPZ 3 and a minor watercourse. The post-mitigation impact remained as minor negative, as the GNLP policies were not expected to fully mitigate potential impacts on the watercourse. Planning and EA consents regarding water pollution are not considered within the high level SA assessment.</p> 	

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REGULATION 22 REPRESENTATIONS (DISCUSSED AT HEARINGS)					
5	Clayland Estates Ltd submitted by Maxey Grounds & Co	23954	<p>HINGHAM SITES</p> <p>Clayland's Objection grounds make detailed reference to how and why the site assessment process has not been conducted fairly consistently and objectively in the booklets or the SA.</p> <p>It is submitted that an unsound site assessment process renders the proposed allocation of GNLPO503 and GNLPO520 unsound. Rep wants site GNLPO298 to be allocated.</p> <p>We also not that in Section D19 of the SA, in addition to the two proposed allocation sites, site GNLPO4011 at Hall Close has been singled out for more detailed assessment.</p>	<p>The same high level and strategic appraisal method has been used to assess all reasonable alternative sites including GNLPO503, GNLPO503(R18C), GNLPO520, GNLPO520(R18C), GNLPO298 and GNLPO4011.</p> <p>The representation does not acknowledge the post-mitigation assessment of reasonable alternative sites (Appendix E), which was undertaken prior to the assessment of site policies (Appendix F). The information within site allocation policies was not used to inform the post-mitigation scoring in the SA, as the SA process only used information available for all reasonable alternative sites (see sequencing infographics in Figures 1 and 2).</p> <p>The SA process must be fair and comparable. The same methodology, using an SA Framework that was designed via consultation with the statutory consultees, has been used throughout the process. The same receptor datasets have been used to assess each reasonable alternative. Submissions of evidence via representations on a single site could potentially bias SA performance and depart from the objective and comparable basis on which the methodology has been designed and operated. For this reason, they have not been factored into the SA process.</p> <p>In the SA assessments, the amended reasonable alternative sites GNLPO503(18C) and GNLPO520(18C) do perform better than GNLPO298 in some SA Objectives, based on the same site assessment methodology pre- and post-mitigation (see Appendix D and E of Regulation 19 SA). The representation appears to have overlooked the fact that it is these smaller versions GNLPO503(18C) and GNLPO520(18C) that went on to be 'selected' by the Councils, and feature in the site allocation policies which were subsequently assessed in Appendix F of the Regulation 19 SA.</p> <p>Outline reasons for selection and rejection were provided by the Councils as follows:</p> <ul style="list-style-type: none"> • GNLPO503(18C) selected "This site is proposed for allocation on a reduced boundary from the site originally promoted. The site as originally submitted was too large and would have swamped the town. The site has been further reduced since Regulation 18C, to ensure the appropriate density of development. The smaller site has been chosen for allocation as it has minimal constraints and development of up to 20 dwellings is considered acceptable subject to highway improvements." • GNLPO520(18C) selected "This site is proposed for allocation on a reduced boundary to avoid areas of surface water flood risk and historic environment impacts. The site has been chosen for allocation as it is well located on the approach into the village adjacent to the existing allocated site." • GNLPO298 rejected "This site is not considered to be suitable for allocation as, despite the proposal to deliver community woodland, allocating this site in addition to the preferred site would result in growth which may swamp the town's services." • GNLPO503 and GNLPO520 both rejected as "An alternative version of this site has been chosen for allocation." 	No

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6	Drayton Farms Ltd & RG Carter Ltd	24066	<p>VARIOUS SITES</p> <p>Drayton Farms Ltd and RG Carter Farms Ltd have made extensive representations to the GNLP process to date, which are supported by a detailed evidence base in respect of the two sites which are proposed for allocation (GNLP0332R and GNLP0334R) or, in the case of the smaller site GNLP0334R alternatively as a contingency site.</p> <p>Reference is made to the proposed allocation at Taverham (GNLP0337) in respect of which there has been no evidence produced (in so far as we are aware) which relates to its likely landscape impacts.</p> <p>The absence of any evidence to demonstrate this matter has been addressed by the SA not only means there has been a failure to assess the likely significant effects of reasonable alternatives in this regard, but also renders the proposed open space allocations proposed by the GNLP (such as HEL4/GNLP1019) unsound.</p> <p>By way of example, it is simply not possible to understand the basis upon which the contingency site (GNLP2043/0581) has been selected by contrast with the</p>	<p>The SA is high level and detailed assessments have not been undertaken. The SA assessed all reasonable alternative sites in the same way, based on the proposal information provided by the Council at the time of assessment. No further supplementary material was considered in the assessment of reasonable alternative sites beyond this. Submissions of evidence via representations on a single site could potentially bias SA performance and depart from the objective and comparable basis on which the methodology has been designed and operated. For this reason, they have not been factored into the SA process.</p> <p>Site GNLP0337 was assessed equally to all reasonable alternative sites within the SA. In terms of impacts on landscape, the pre-mitigation SA assessments identified potential for a minor negative impact on landscape associated with alteration of landscape character, views experienced by PRoW users and existing local residents, and urbanisation of the countryside. The post-mitigation assessment identified potential minor negative impacts would remain including on landscape relating primarily to the urbanisation of the countryside, which was not considered to be fully mitigated by the local plan policies (see R19 SA Appendix E). The assessment did not consider any external evidence for landscape assessments beyond those identified in the methodology chapter (see Box 4.4 of the R19 SA in particular for landscape methodology and assumptions).</p> <p><u>Recreational open space:</u> The SA process has assessed all reasonable alternative sites in the same way using the SA Framework. The SA Framework includes an SA Objective for Health which includes decision making criteria concerned with green infrastructure which includes green space. The SA has used Ordnance Survey 'open greenspace' shapefiles for the purpose of assessing accessibility of proposed residential sites to existing green space, which shows the location of public parks, playing fields, sports facilities, play areas, allotments and others.</p> <p>The SA has assessed all reasonable alternative sites identified by the Councils. In terms of sites specifically identified by the Councils for provision of new 'recreational open space', this includes the following sites:</p> <ul style="list-style-type: none"> • HET3 'Land west of Poppyfields'; • BRU2 'Land north of Berryfields, Brundall'; • BRU3 'Land east of the Memorial Hall, Brundall'; and • HEL4/GNLP1019 'Land north east of Reepham Road'. <p><u>Contingency sites:</u> If a site has been identified by the Councils as a 'contingency site', this had no bearing on the way in which the site was assessed in the SA. All reasonable alternative sites have been assessed in the same way using the same methodology as set out in the SA reports. The SA is high level and does not take into account information such as the potential timing of development delivery.</p> <p><u>Site Assessment Booklets:</u> Information for each reasonable alternative site such as site size, proposed use and dwelling number were extracted from the Site Assessment Booklets provided by the Councils in draft form and were used as the</p>	No

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			<p>reasonable alternatives GNLPO332R and/or GNLPO334R.</p> <p>Query transparency of decision making with the booklets: It certainly appears that the conclusions of the booklet drove the outcome of the SA 2021, as opposed to undertaking an objective assessment process grounded in a robust evidence base.</p>	<p>basis for site assessments in the SA. No other information from the Site Assessment Booklets was used in the preparation of the SA, other than the outline proposal information for reasonable alternative sites. The findings of the SA site assessments were fed back to the Councils. It is the Councils' role to use the SA findings, alongside other relevant evidence base information, to help make decisions regarding the selection or rejection of each reasonable alternative site (see sequencing infographic in Figure 1).</p> <p>Outline reasons for selection and rejection (set out in Appendix G of the R19 SA) were provided by the Councils as follows:</p> <ul style="list-style-type: none"> GNLP2043/0581 selected "Sites GNLPO581 and GNLPO2043 are considered together as a contingency site for 800 dwellings should this prove to be required due to the low delivery of sites. The site is well located on the edge of Norwich in close proximity to the A47 Longwater Interchange and services and facilities in Costessey and at Longwater". GNLP0332R rejected "This site is not considered to be suitable for allocation as development in this location would increase the urban sprawl of Hellesdon further into the open countryside with subsequent landscape impacts. There are noise and safety concerns regarding proximity to the airport and the location of the site under the flight path. Significant highway improvements would also be necessary. Site GNLPO332 was originally submitted in 2016 on a 49ha boundary but this was revised to 64ha prior to the site assessment process commencing so the original site was never formally assessed or subject to Sustainability Appraisal". GNLP334R rejected "This site is not considered to be suitable for allocation as development in this location would increase the urban sprawl of Hellesdon further into the open countryside with subsequent landscape impacts. There are noise and safety concerns regarding proximity to the airport and the location of the site under the flight path. Significant highway improvements would also be necessary. Site GNLPO334 was originally submitted in 2016 on a 6.4ha boundary but this was revised to 11.70ha prior to the site assessment process commencing so the original site was never formally assessed or subject to Sustainability Appraisal". 	
7	David Lock Associates on behalf of Halsbury Homes (originally on behalf of Orbit Homes)	24516	<p>VARIOUS SITES: HONINGHAM, SILFIELD, HETHEL</p> <p>As demonstrated and explained in Paragraphs 4.1 and 4.2 and Table 1 and 2 of our Regulation 19 Representations, the Honingham site has been assessed as five separate land parcels compared to the assessment of garden villages at Silfield (GNLP4057A) and Hethel (GNLP1055R) as entire sites. This inconsistency is not in</p>	<p>Reasonable alternative sites were identified by the Councils. The SA assessed all reasonable alternative sites in the same way, based on the proposal information provided by the Councils at the time of assessment. This included the following:</p> <ul style="list-style-type: none"> Honingham – five sites assessed in the R18C SA (GNLP0415R-A, GNLPO415R-B, GNLPO415R-C, GNLPO415R-D and GNLPO415R-G) and two sites assessed in the R19 SA (GNLP0415R-E and GNLPO415R-F). Silfield – three sites assessed in the R19 SA (GNLP4057A, GNLPO4057B and GNLPO4057C). Hethel – one site assessed in the R19 SA (GNLP1055R). <p>Garden village proposals were not identified by the Councils as a separate 'tier' of reasonable alternatives and subsequently the SA did not assess them as such.</p>	Yes – The Honingham Thorpe site GNLPO415R has been re-assessed as one parcel, for consistency with the other 'garden village' proposals. See Appendix B .

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			<p>accordance with the Planning Practice Guidance (PPG) requirements that all reasonable alternatives are assessed on an equal basis and to the same level of detail.</p>	<p>Information for each reasonable alternative site such as site size, proposed use and dwelling number (if available) were extracted from the Site Assessment Booklets provided by the Councils in draft form and were used as the basis for site assessments in the SA.</p> <p>All three 'garden village' locations were rejected by the Councils, with outline reasons as follows:</p> <ul style="list-style-type: none"> • GNLP0415R-A, B, C, D, E, F and G "There are currently no proposals to allocate a new settlement in the local plan, however GNLP0415 is being considered within the context of options for a new settlement in the future". • GNLP4057A, B and C "There are currently no proposals to allocate a new settlement in the local plan, however GNLP4057 is being considered within the context of options for a new settlement in the future". • GNLP1055R "Based on revisions to the Part 1 Strategy, a contingency site or sites for 1,000 homes in Wymondham is not being sought. A site of GNLP1055's size is therefore not required for Wymondham as set out in the Part 1 Strategy. Instead, GNLP1055 is being considered within the context of options for a new settlement in the future". <p>(See Row 4 above for further information re. the previous rep submitted by David Lock Associates)</p>	
8	Pigeon Investment Management	24098	<p>BRUNDALL SITE</p> <p>Pigeon do not consider that all sites have been assessed on a comparable basis, and consider that site GNLP0352 has not been assessed correctly.</p> <p>There is limited evidence to suggest that discounted sites have been adequately compared with alternative sites, nor have they been included in the list of additional reasonable alternative site assessments for consideration.</p>	<p>The SA is high level and detailed assessments have not been undertaken. The SA assessed all reasonable alternative sites in the same way, based on the proposal information provided by the Council at the time of assessment. No further supplementary material was considered in the assessment of reasonable alternative sites beyond this. Submissions of evidence via representations on a single site could potentially bias SA performance and depart from the objective and comparable basis on which the methodology has been designed and implemented. For this reason, this level of information has not been factored into the SA process.</p> <p>Information for each reasonable alternative site such as site size, proposed use and dwelling number (if available) were extracted from the Site Assessment Booklets provided by the Councils in draft form and were used as the basis for site assessments in the SA.</p> <p>Where development proposals had unspecified housing numbers in the booklets, these were assumed to be in compliance with professional estimates of typical gross densities for each local planning authority, provided in the GNLP Housing and Economic Land Availability Assessment (HELAA). This is 25 dwellings per hectare (dph) for Broadland, resulting in the assessment of Site GNLP0352 with potential for 366 dwellings.</p> <p>The findings of the SA site assessments were fed back to the Councils. It is the Councils' role to use the SA findings, alongside other relevant evidence base information, to help make decisions regarding the selection or rejection of each reasonable alternative site (see sequencing infographic in Figure 1).</p>	<p>Yes – A response for Site GNLP0352 has been prepared regarding this matter based on the updated proposal information provided in omitted R18C rep. See Appendix A.</p>

#	REP NAME & ID REF	REP ID	MAIN SITE-SPECIFIC ISSUES RAISED	LEPUS COMMENT	ANY ADJUSTMENT TO SA OF SITES REQUIRED?
				The Councils' outline reason for rejection of Site GNLP0352 was " <i>This site is not considered to be suitable for allocation. Little additional growth is proposed in Brundall due to substantial existing commitment and concerns about capacity of the A47 roundabout. Development on this site would have potentially significant landscape impacts.</i> "	
9	Barton Wilmore on behalf of Terra Strategic	24244	<p>COSTESSEY SITE GNLP0581/2043</p> <p>Identified as a contingency allocation, creates uncertainty over whether the necessary land for the education places can be provided to support the growth within the Plan. The implications of this should be assessed within the SA.</p> <p>As set out in our response to Matter 3, we provide a suggested amendment to the wording of Policy 71 and Policy GNLP0581/2043 to address this issue.</p>	<p>The R19 SA report states, in Box 4.10 which regards assessment methodologies and assumptions relating to SA Objective 10 (Education), that "<i>At this stage, there is not sufficient information available to be able to accurately predict the effect of new development on the capacity of local schools, or to incorporate local education attainment rates into the assessment.</i>"</p> <p>The reasonable alternative sites GNLP0581 and GNLP2043 were assessed pre- and post-mitigation in the SA (see Appendix D and E of R19 SA). Site GNLP0581/2043 was subsequently selected as an allocation by the Councils and a site allocation policy prepared, which was assessed in the R19 SA (Appendix F).</p> <p>If a site has been identified by the Councils as a 'contingency site', this had no bearing on the way in which the site was assessed in the SA. All reasonable alternative sites have been assessed in the same way using the same methodology as set out in the SA reports. The SA is high level and does not take into account information such as the potential timing of development delivery.</p>	No
10	James Bailey Planning on behalf of Welbeck Strategic Land	24525	<p>WYMONDHAM SITE 'land North of Tuttle Lane East, Wymondham', ref GNLP0006.</p> <p>The 11 sites listed under D.34 Wymondham have been assessed on a comparable basis, however, there has been no further development on those sites initially discounted at Regulation 18c stage.</p>	<p>The purpose of the SA is to appraise reasonable alternatives to the plan. The Councils identify the reasonable alternatives; the SA process assesses them. The Councils act on the findings of the SA, in addition to other relevant evidence base documents, and select / reject reasonable alternatives accordingly. This process is called iteration. The SA has applied the same appraisal methodology to all reasonable alternative sites and supplied the assessment findings back to the Councils at each stage of the plan making process.</p> <p>Reasonable alternatives have been identified at different stages of the plan making process i.e. R18 and R19, however the same sequence of appraisal always takes place. This is illustrated in Figure 2, below. Any reasonable alternative is firstly assessed Pre-Mitigation (i.e. before applying any policy mitigation) and then Post-Mitigation. The Councils then select or reject the site. If a site is selected that was assessed as a reasonable alternative during an earlier stage of plan making e.g. R18, it will feature again at R19. At this point, the site will again be appraised by the SA process because: (1) The SA process is providing an update to earlier appraisals in order to make sure that the appraisal is as up to date as possible; typically little will have changed unless the Councils provide more detail about the site now that the plan is maturing and (2) The SA is appraising the latest version of the entire plan which will naturally include site selection by the R19 stage; this means that sites are again assessed where they have been selected for allocation and a site policy has been prepared by the Councils, but sites not selected for inclusion in R19 are not re-assessed.</p>	No

#	REP NAME & ID REF	REP ID	MAIN SITE-SPECIFIC ISSUES RAISED	LEPUS COMMENT	ANY ADJUSTMENT TO SA OF SITES REQUIRED?
				<p>The Councils' outline reason for rejection of the reasonable alternative Site GNLP0006 was the following: <i>“Based on revisions to the Part 1 Strategy, a contingency site or sites for 1,000 homes in Wymondham is not being sought. Neither is GNLP0006 considered a preferred alternative over GNLP0354R or GNLP3013. A third site allocation in Wymondham would be in excess of the strategic requirement for new homes as set out in the Part 1 Strategy.”</i></p> <p>See infographic (Figure 1) which outlines SA findings and how they are fed through to the selection process.</p>	

3 Infographics to illustrate the iterative SA process

3.1 Iterative SA process for the Greater Norwich Local Plan

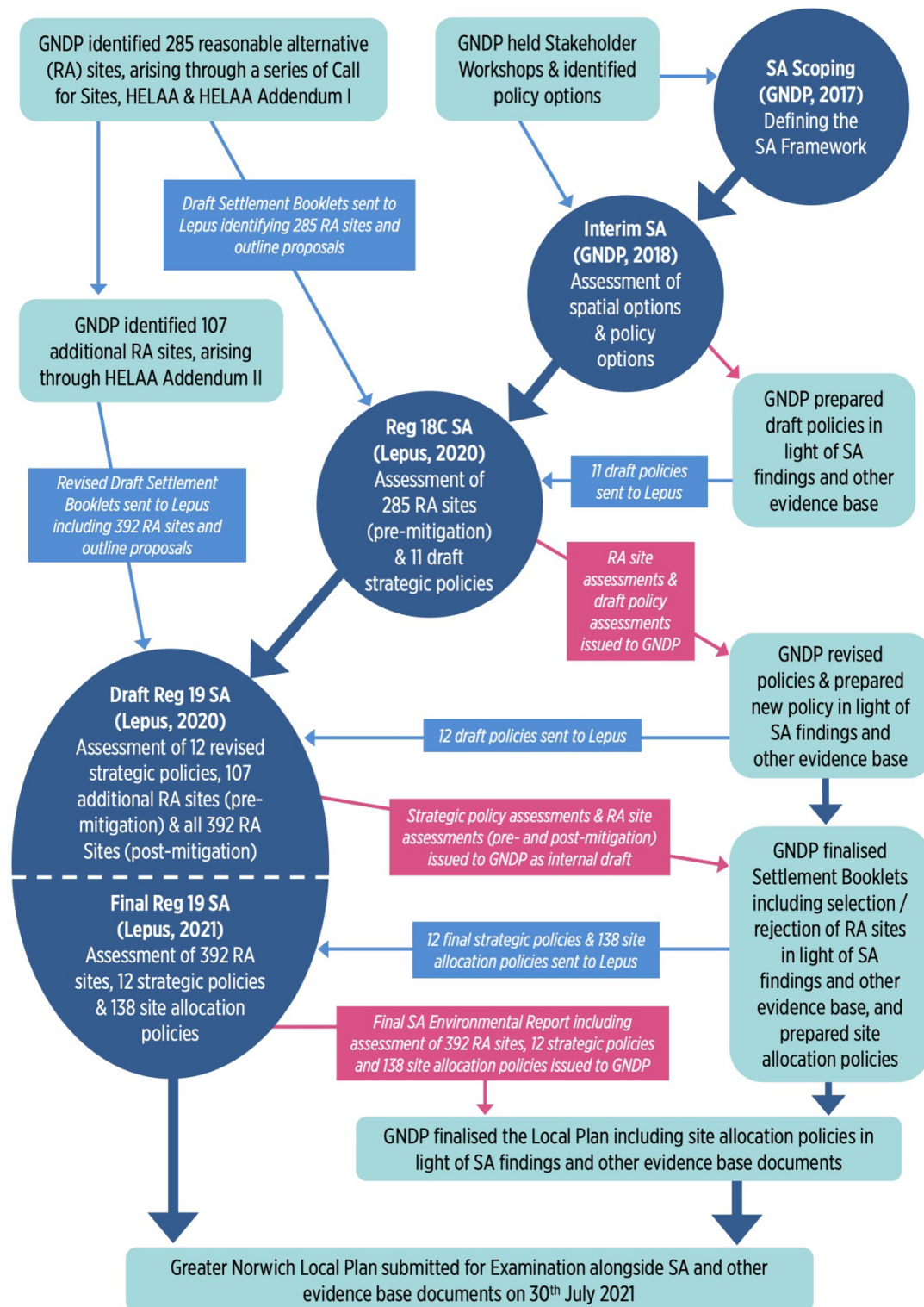


Figure 1: Flowchart summarising the iterative SA process undertaken during the preparation of the GNLP

3.2 SA site assessment process

1. PRE-MITIGATION REASONABLE ALTERNATIVE SITE ASSESSMENTS

Lepus assessed reasonable alternative sites without consideration of mitigation, based on the proposal information within the draft 'Site Assessment Booklets' provided by the GNDP.

This comprised 285 sites presented within the Regulation 18C SA, and an additional 107 sites within the Regulation 19 SA (Appendix D), totalling 392 reasonable alternative sites.



2. POST-MITIGATION REASONABLE ALTERNATIVE SITE ASSESSMENTS

Lepus assessed reasonable alternative sites with consideration of the potential mitigating influence of the emerging GNLP strategic policies and other development management policies in adopted lower tier plans that might reasonably be expected to help mitigate identified adverse effects.

This comprised 392 sites presented within the Regulation 19 SA (Appendix E).



3. SITE ALLOCATION POLICY ASSESSMENTS

Lepus assessed the site allocation policies provided by the GNDP, which included further site-specific requirements in relation to the preferred sites for allocation in the GNDP.

This comprised 138 site policies presented within the Regulation 19 SA (Appendix F).

Figure 2: Summary of site assessment process undertaken during the Regulation 18 and 19 SA of the GNLP

Appendix A: Response to submission made by Pigeon Investment Management in respect to Site GNLP0352

GNLP EiP

Matter 1 – Compliance with statutory procedures and legal matters

Issue 2: Does the Sustainability Appraisal (SA) including the addendum, adequately assess the environmental, social and economic effects of the Plan in accordance with legal and national policy requirements?

Response to submission made by Pigeon Investment Management in respect to Site GNLP0352 only.

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A.1 Overview: Site GNLP0352

A.1.1 Context

A.1.1.1 Site GNLP0352 was assessed in the Regulation 18C SA¹ (Appendix B), as part of the ‘Brundall and Postwick-with-Witton’ cluster, in Broadland, based on the information provided by the Councils as set out in **Table A.1**.

Table A.1: Site information used to assess Site GNLP0352 (Reg 18C SA)

HELAA site number	Name of HELAA site	Site use	Area (ha)	Housing number
GNLP0352	Land North of Brecklands Road	Residential	14.67	366*

**Where development proposals have unspecified housing numbers, these were assumed to be in compliance with professional estimates of typical gross densities for each local planning authority, provided in the GNLP Housing and Economic Land Availability Assessment (HELAA)². This is 25 dwellings per hectare (dph) for Broadland.*

A.1.1.2 According to the Statement of Common Ground³, the site should be assessed for: “*Proposed Development: High-quality landscape-led scheme comprising around 75 new homes, including affordable homes, self-build, bungalows and assisted living/care home provision, land for a two-form entry primary school together with extensive areas of publicly accessible amenity space/country park.*”

¹ Lepus Consulting (2020) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan: Regulation 18 (C), January 2020. Available at: [https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Req18\(C\)_Final.pdf](https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Req18(C)_Final.pdf) [Date Accessed: 02/03/22]

² Greater Norwich Development Partnership (2017) Greater Norwich Local Plan: Housing and Economic Land Availability Assessment (HELAA)

³ Greater Norwich Local Plan (GNLP) Site Statement of Common Ground (SoCG) Between Broadland District Council, South Norfolk Council, Norwich City Council, Norfolk County Council and Pigeon Investment Management Ltd. Available at: <https://www.gnlp.org.uk/sites/gnlp/files/2021-11/SoCG%20Brundall%20GNLP0352%20final.pdf> [Date Accessed: 02/03/22]

A.2 Pre-Mitigation Assessment

A.2.1 Overview

A.2.1.1 The process which has been used to appraise reasonable alternative sites is sequenced through two stages. Firstly, sites are assessed in terms of impacts on the baseline without consideration of mitigation. Secondly, the appraisal findings are further assessed in light of any relevant mitigation that is available through for example, emergent local plan policies.

A.2.1.2 The pre-mitigation assessment provides a baseline assessment of each site and identifies any local constraints. The pre-mitigation assessment does not consider mitigating factors such as Local Plan policy. The purpose of this stage is to identify the impacts that would need to be overcome for development to optimise sustainability performance.

A.2.1.3 All reasonable alternatives are assessed in the same way using the same method, as set out in the SA reports, against the SA Framework.

A.2.1.4 The SA Framework consists of a range of environmental, social and economic objectives. The extent to which these objectives are achieved can, in most cases, be measured using a range of indicators or 'receptors'.

A.2.2 Assessment findings

A.2.2.1 **Table A.2** provides an overview of the changes to the assessment of Site GNLP0352 based on the updated proposal information, per SA Objective. A summary narrative of the changes to assessment findings per receptor, explaining the changes shown in **Table A.2**, is provided in **Table A.3**. Please refer to the Regulation 19 SA Report⁴ for the full methodology.

Table A.2: Impact matrix for Site GNLP0352 (pre-mitigation)

Pre-Mitigation Assessment of Site GNLP0352	SA Objective														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity, Geodiversity & GI	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport & Access to Services	Historic environment	Natural resources, waste & contaminated land	Water
R18C SA (2020)	--	--	-	-	++	-	0	--	0	--	+	-	-	-	-
Re-assessment (2022)	-	--	-	-	+	-	0	--	0	-	+	-	-	-	-

⁴ Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan Volume 2 of 3: Regulation 19 SA Report, January 2021. Available at: https://www.qnlp.org.uk/sites/qnlp/files/2021-01/LC-663_Vol_2of3_GNLP_SA_Reg19_20_250121LB_compressed%20Jan%202021.pdf [Date Accessed: 15/06/22]

Table A.3: Summary of changes to assessment of Site GNLP0352 per receptor (pre-mitigation)

SA Objective	Previous assessment (Reg 18C SA, 2020)	Summary of changes per receptor based on new proposal information
1. Air Quality and Noise	AQMA/main road/railway – Over 200m from all, negligible	No change
	Air pollution – Over 100 dwellings, major negative	Reduced housing number, changed from major negative to minor negative
2. Climate Change Mitigation and Adaptation	Carbon emissions – Within 60-600 dwellings threshold, potential increase in carbon emissions over 0.1% of current levels in Broadland, minor negative	Reduced housing number, now below threshold, changed from minor negative to negligible
	Flood zone – Small proportion of the site is within Flood Zone 2 and 3a, major negative	No change
	SWFR – N/A, negligible	No change
3. Biodiversity, Geodiversity and Green Infrastructure	European sites – Approx. 600m from The Broads/Broadlands SAC/SPA/Ramsar, potential for adverse effects, minor negative	No change
	SSSI – Within IRZ which states “ <i>Any residential developments outside of existing settlements/urban areas with a total net gain in residential units</i> ” should be consulted on with Natural England, minor negative	No change
	NNR – 370m NE of Mid-Yare NNR, potential increased threats/pressures, minor negative	No change
	Priority habitat – Coincides with small areas of ‘lowland fens’ and ‘deciduous woodland’, potential loss/degradation, minor negative	No change
4. Landscape	National Park – 300m from The Broads, potential alteration of views and character, minor negative	No change
	Country Park – N/A, negligible	Proposal now includes a new Country Park (or publicly accessible amenity space), changed from negligible to minor positive
	LCA – Loss of arable land, potential for alteration of local character, minor negative	No change
	Views from PRoW/existing local residents – Potential alteration of views, minor negative	No change
	Urbanisation on the countryside – Development on previously undeveloped land outside of existing settlement, minor negative	No change
5. Housing	Net gain in housing – Over 100 dwellings, major positive	Reduced housing number, changed from major positive to minor positive
6. Population and Communities	Local service – Outside 600m sustainable target distance, minor negative	No change
	Local landscape designation – Within 600m, likely good access, minor positive	No change
7. Deprivation	N/A, negligible	No change
8. Health	Healthcare facilities (NHS hospital / GP surgery / leisure facilities) – Outside sustainable target distances to all, resulting in major negative overall	No change
	AQMA/main road – Over 200m from both, minor positive	No change
	Green network – Good access, within 600m sustainable target distance from PRoW/greenspace, minor positive	No change
9. Crime	N/A, negligible	No change
10. Education	Primary school – Majority outside 800m sustainable target distance, closest is Brundall Primary School approx. 1km away, minor negative (major negative due to outside both primary and secondary school)	Proposal now includes a new 2-form primary school, changed from minor negative to minor positive

SA Objective	Previous assessment (Reg 18C SA, 2020)	Summary of changes per receptor based on new proposal information
	Secondary school – Outside 1.5km sustainable target distance, closest is Thorpe St. Andrew School and Sixth Form approx. 6.7km away, minor negative (major negative due to outside both primary and secondary school)	No change
11. Economy	Employment floorspace provision – N/A, negligible	No change
	Access to employment – Within 5km sustainable target distance to primary employment location, minor positive	No change
12. Transport and Access to Services	Bus stop – Outside 400m sustainable target distance from nearest bus stop with regular service, minor negative	No change
	Railway station – Good access, within 2km sustainable target distance to Brundall Station, minor positive	No change
	Pedestrian access – Connected to existing footpath network, minor positive	No change
	Road network – Connected to existing road network, minor positive	No change
13. Historic Environment	Grade I Listed Building – 250m from 'Church of St Michael', potential for adverse impact on countryside setting, minor negative	No change
14. Natural Resources, Waste and Contaminated Land	Household waste – Within 56-555 dwellings threshold, potential increase in waste over 0.1% of current levels in Broadland, minor negative	No change
	ALC – Coincides with ALC Grade 3, potential loss of BMV land, minor negative	No change
	Loss of undeveloped land – Loss of over 20ha previously undeveloped land and associated soils, minor negative	No change
15. Water	Groundwater SPZ – Within Zone 3, potential risk of groundwater contamination, minor negative	No change
	Watercourse – Majority of site within 200m of watercourse (site boundary follows the Run Dike), potential risk of contamination, minor negative	No change

A.3 Post-Mitigation Assessment

A.3.1 Assessment findings

A.3.1.1 Following careful consideration of the mitigation effects of the strategic policies and Local Plan DM policies on the assessment findings, the post-mitigation assessment findings for all reasonable alternative sites considered throughout the GNLP preparation, including Site GNLP0352, were presented in the Regulation 19 SA Report (Appendix E)⁵.

A.3.1.2 Based on the new proposal information for Site GNLP0352 the only change to the post-mitigation performance of Site GNLP0352 is SA Objective 5 (housing), where the lower proposed housing number would result in a minor positive impact rather than a major positive impact (see **Table A.4**).

Table A.4: Impact matrix for Site GNLP0352 (post-mitigation)

Post-Mitigation Assessment of Site GNLP0352	SA Objective														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity, Geodiversity & GI	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport & Access to Services	Historic Environment	Natural Resources, Waste & Contaminated Land	Water
R19 SA (2021)	-	--	-	-	++	+	+	-	+	-	+	+	0	-	-
Re-assessment (2022)	-	--	-	-	+	+	+	-	+	-	+	+	0	-	-

⁵ Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan Volume 3 of 3: Appendices, January 2021. Available at: https://www.gnlp.org.uk/sites/gnlp/files/2021-01/LC-663_Vol_3of3_Appendices_3_250121LB_compressed%20Jan%202021.pdf [Date Accessed: 15/06/22]

Appendix B: Response to submission made by David Lock Associates in respect to Site GNLP0415R

GNLP EiP

Matter 1 – Compliance with statutory procedures and legal matters

Issue 2: Does the Sustainability Appraisal (SA) including the addendum, adequately assess the environmental, social and economic effects of the Plan in accordance with legal and national policy requirements?

Response to submission made by David Lock Associates in respect to Site GNLP0415R (Honingham Thorpe)

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B.1 Introduction

B.1.1 Overview: Site GNLP0415R

B.1.1.1 Site GNLP0415R was assessed in the SA process in seven separate site parcels based on the information provided by the Councils at the time of assessment. Sites GNLP0415R-A, GNLP0415R-B, GNLP0415R-C, GNLP0415R-D, GNLP0415R-F and GNLP0415R-G were assessed within the Regulation 18C SA¹ (Appendix B), and Sites GNLP0415R-E and GNLP0415R-F within the Regulation 19 SA² (Appendix D), as part of the ‘Easton and Honingham’ cluster.

B.1.1.2 The sites were assessed based on the information provided by the Councils as set out in **Table B.1.1**.

Table B.1.1: Site information used to assess Honingham Thorpe sites in earlier SA stages

HELAA site number	Name of HELAA site	Site use	Area (ha)	Housing number	SA stage originally assessed at
GNLP0415R-A	Honingham Thorpe A	Residential	113.88	2,828*	Reg 18C SA
GNLP0415R-B	Honingham Thorpe B	Employment	15.04	N/A	Reg 18C SA
GNLP0415R-C	Honingham Thorpe C	Employment	53.37	N/A	Reg 18C SA
GNLP0415R-D	Honingham Thorpe D	Residential	85.53	2,138*	Reg 18C SA
GNLP0415R-E	Honingham Thorpe E	Country Park	70.53	N/A	Reg 19 SA
GNLP0415R-F	Honingham Thorpe F	Nature Reserve	3.45	N/A	Reg 19 SA
GNLP0415R-G	Honingham Thorpe G	Residential	10.65	266*	Reg 18C SA

**Where development proposals have unspecified housing numbers, these were assumed to be in compliance with professional estimates of typical gross densities for each local planning authority, provided in the GNLP Housing and Economic Land Availability Assessment (HELAA)³. This is 25 dwellings per hectare (dph) for Broadland and South Norfolk.*

¹ Lepus Consulting (2020) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan: Regulation 18 (C), January 2020. Available at: [https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Reg18\(C\)_Final.pdf](https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Reg18(C)_Final.pdf) [Date Accessed: 16/06/22]

² Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan Volume 3 of 3: Appendices, January 2021. Available at: https://www.gnlp.org.uk/sites/gnlp/files/2021-01/LC-663_Vol_3of3_Appendices_3_250121LB_compressed%20Jan%202021.pdf [Date Accessed: 16/06/22]

³ Greater Norwich Development Partnership (2017) Greater Norwich Local Plan: Housing and Economic Land Availability Assessment (HELAA)

B.1.1.3 In response to a representation submitted by David Lock Associates on behalf of Halsbury Homes, regarding the Regulation 19 SA of the GNLP, the seven sites as listed in **Table B.1.1** have been re-assessed in this appendix to provide consistency with the other 'garden village' proposals.

B.1.1.4 **Table B.1.2** sets out the information used to appraise Site GNLP0415R as a whole, within this appendix, based on a combination of the previous individual site parcel information as set out in **Table B.1.1**.

Table B.1.2: Site information used to assess Honingham Thorpe site within this appendix

HELAA site number	Name of HELAA site	Site use	Total Area (ha)	Housing number
GNLP0415R	Honingham Thorpe	Garden Village – to include residential, employment, country park and nature reserve	352.45	5,232*

Based on the summed indicative housing numbers for each component site as set out in **Table B.1.1.*

B.2 Pre-Mitigation Assessment

B.2.1 Overview

B.2.1.1 The process which has been used to appraise reasonable alternative sites is sequenced through two stages. Firstly, sites are assessed in terms of impacts on the baseline without consideration of mitigation. Secondly, the appraisal findings are further assessed in light of any relevant mitigation that is available through for example, emergent local plan policies.

B.2.1.2 The pre-mitigation assessment provides a baseline assessment of each site and identifies any local constraints. The pre-mitigation assessment does not consider mitigating factors such as Local Plan policy. The purpose of this stage is to identify the impacts that would need to be overcome for development to optimise sustainability performance.

B.2.1.3 All reasonable alternatives are assessed in the same way using the same method, as set out in the SA reports, against the SA Framework.

B.2.1.4 The SA Framework consists of a range of environmental, social and economic objectives. The extent to which these objectives are achieved can, in most cases, be measured using a range of indicators or 'receptors'.

B.2.2 Previous SA assessment findings

B.2.2.1 **Table B.2.1** provides an overview of the SA findings for Sites GNLP0415R-A to G, extracted from the Regulation 18 and 19 SA Reports, per SA Objective. For the full methodology and assessment of sites carried out during the SA process, please refer to the Regulation 18C SA Report⁴ for Sites GNLP0415R-A, B, C, D and G, and the Regulation 19 SA Report⁵ for Sites GNLP0415R-E and F.

⁴ Lepus Consulting (2020) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan: Regulation 18 (C), January 2020. Available at: [https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Reg18\(C\)_Final.pdf](https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Reg18(C)_Final.pdf) [Date Accessed: 16/06/22]

⁵ Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan Volume 2 of 3: Regulation 19 SA Report, January 2021. Available at: https://www.gnlp.org.uk/sites/gnlp/files/2021-01/LC-663_Vol_2of3_GNLP_SA_Reg19_20_250121LB_compressed%20Jan%202021.pdf [Date Accessed: 15/06/22]

Table B.2.1: Impact matrix for Site GNLP0415R when considered as individual site components (pre-mitigation)

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity, Geodiversity & GI	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport & Access to Services	Historic environment	Natural resources, waste & contaminated land	Water
GNLP0415R-A	--	--	-	-	++	-	0	--	0	--	+	-	-	--	-
GNLP0415R-B	--	-	-	-	0	-	0	--	0	0	++	-	-	-	-
GNLP0415R-C	--	+	-	-	0	-	0	--	0	0	++	-	-	--	-
GNLP0415R-D	--	--	-	-	++	-	0	--	0	--	+	-	-	--	-
GNLP0415R-E	0	0	+	+	0	0	0	+	0	0	0	0	0	0	0
GNLP0415R-F	0	0	+	+	0	0	0	+	0	0	0	0	0	0	0
GNLP0415R-G	--	-	-	-	++	-	0	--	0	--	-	-	-	-	-

B.2.3 Assessment of combined site GNLP0415R

B.2.3.1 **Table B.2.2** provides an overview of the SA findings for the re-assessment of Site GNLP0415R carried out within this appendix, per SA Objective. This assessment is based on the same methodology as used for other reasonable alternative sites during the SA process. Please refer to the Regulation 18 SA Report and Regulation 19 SA Report⁶ for the full methodology.

B.2.3.2 For certain SA Objectives, assumptions have been made regarding the provision of supporting infrastructure that would be likely to come forward as part of a garden village proposal, which is consistent with the approach applied to comparable sites assessed in the Regulation 19 SA Report (see Appendix D for the assessment of Silfield Garden Village - GNLP4057A and 'East of Hethel, Stanfield Hall Estate' - GNLP1055R).

B.2.3.3 The following assessment narrative presented within this section provides further context and explanation regarding the assessment findings per receptor, within each of the SA Objectives.

⁶ Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan Volume 2 of 3: Regulation 19 SA Report, January 2021. Available at: https://www.gnlp.org.uk/sites/gnlp/files/2021-01/LC-663_Vol_2of3_GNLP_SA_Reg19_20_250121LB_compressed%20Jan%202021.pdf [Date Accessed: 15/06/22]

Table B.2.2: Impact matrix for Site GNLP0415R when considered as a whole (pre-mitigation)

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity, Geodiversity & GI	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport & Access to Services	Historic environment	Natural resources, waste & contaminated land	Water
GNLP0415R	--	--	-	-	++	+	0	--	0	-	++	-	-	--	-

SA Objective 1 – Air Quality and Noise

B.2.3.4 Main Road: The A47 passes to the north of Easton and Honingham. Site GNLP0415R is located adjacent to this road, with a proportion of the site situated within 200m of the road. Therefore, the proposed development at this site could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using the A47 would be expected to have a minor negative impact on air quality and noise at this site.

B.2.3.5 Air Pollution: Site GNLP0415R is proposed for the development of approximately 5,232 dwellings and 68.41ha of employment floorspace. The large scale of proposed development at this site could potentially result in a significant increase in local air pollution during both construction and occupation of development; therefore, a major negative impact would be expected.

SA Objective 2 – Climate Change Mitigation and Adaptation

B.2.3.6 Carbon Emissions: Site GNLP0415R is proposed for the development of approximately 5,232 dwellings. The proposed development at this site could potentially increase local carbon emissions, as a proportion of Broadland / South Norfolk’s total, by more than 1%. These carbon emissions may be associated with the construction and occupation of development as well as traffic generation. Overall, a major negative impact could be expected.

B.2.3.7 Fluvial Flooding: Site GNLP0415R is located wholly within Flood Zone 1, other than a section of Flood Zone 2, 3a and 3b found within the southern portion of the site which is proposed for GI uses (country park / nature reserve). Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

B.2.3.8 Surface Water Flooding: A small proportion of Site GNLP0415R coincides with areas determined to be at low, medium and high risk of surface water flooding. The proposed development at this site would be expected to have a major negative impact on pluvial flood risk, as development could potentially locate some site end users in areas at high risk of surface water flooding, and/or exacerbate pluvial flood risk in surrounding locations.

SA Objective 3 – Biodiversity, Geodiversity and Green Infrastructure

- B.2.3.9 **National Site Network:** Site GNLP0415R is located within 5km south west of the ‘River Wensum’ SAC. A minor negative impact could be expected as a result of the proposed development at this site, due to the increased risk of development related threats and pressures on this Habitats site.
- B.2.3.10 **SSSI / IRZ:** Advice relating to nutrient neutrality issues has been published in March 2022 by Natural England⁷ and DLUHC⁸, since the preparation of the Regulation 19 SA Report, which affects a large proportion of the GNLP area. According to the latest published IRZs, Site GNLP0415R falls within the Nutrient Impact Zone for the SSSI components underpinning ‘The Broads’ SAC and Ramsar site. The site is located within an IRZ which states that “*for new development with overnight accommodation Reg 63 of the Conservation of Habitats and Species Regulations 2017 must be applied and additional measures required. LPA to refer to Natural England’s Nutrient Neutrality advice*”. At this stage, a likely significant effect arising from the proposed development cannot be ruled out, due to the potential for exceedances in total phosphorous and nitrogen water quality targets at a number of SSSI components.
- B.2.3.11 **Priority Habitat:** Site GNLP0415R coincides with several stands of deciduous woodland priority habitat. The proposed development at this site could potentially result in the loss or degradation of these habitats, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.
- B.2.3.12 **CWS:** Site GNLP0415R is located approximately 20m from ‘Church Meadow, Alder Carr, Three Corner Thicket and Nursery Plantation’ CWS. The proposed development at this site could potentially have a minor negative impact on this CWS, due to increased risk of development related threats and pressures.

SA Objective 4 – Landscape

- B.2.3.13 **Country Park:** The development proposal for Site GNLP0415R includes development of a new country park. Therefore, this would be expected to result in a minor positive impact on the landscape and site end users’ enjoyment of recreation in a countryside environment.

⁷ Letter from Natural England to LPA Chief Executives & Heads of Planning, County Council Chief Executives and Heads of Planning, EA Area and National Team Directors, Planning Inspectorate, Natural Resources Wales (Cross border sites only) & Secretary of State for Department for Levelling Up Housing & Communities (DLUHC). Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitats sites. 16 March 2022.

⁸ Letter from DLUHC to Chief Planning Officers and Local Planning Authorities affected by nutrient pollution. NUTRIENT POLLUTION: NEUTRALITY, SUPPORT AND FUNDING. 16 March 2022. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1061531/Chief_Planner_Letter_about_nutrient_pollution_March_2022.pdf [Date Accessed: 17/06/22]

- B.2.3.14 Landscape Character:** The south of Site GNLP0415R, within South Norfolk, is located within the LCA 'Easton Fringe Farmland'. Some key characteristics of this LCA include arable and pastoral farmland, urban fringe settlement, and recreational uses. The majority of Site GNLP0415R, within Broadland, is located within the LCA 'Weston Green Tributary Farmland'. Some key characteristics of this LCA include mature blocks of woodland, grazing marsh, the landscape setting of churches and characteristic views across the peaceful landscape. Site GNLP0415R comprises a large area of previously undeveloped land including agricultural fields with hedgerow boundaries and blocks of woodland, and as such, the proposed development would be likely to significantly alter the views across the landscape from nearby settlements. Therefore, the proposed development at this site is likely to be discordant with the key characteristics of the associated LCAs and would be expected to have a minor negative impact on the local landscape character.
- B.2.3.15 Views from the PRoW Network:** Site GNLP0415R comprises a large area of previously undeveloped land, with several PRoWs located in the surrounding open countryside. The large scale of proposed development at this site would be likely to alter the views experienced by users of the PRoW network to some extent; therefore, a minor negative impact on the local landscape would be expected.
- B.2.3.16 Views for Local Residents:** Site GNLP0415R is located in close proximity to surrounding settlements such as Colton, Honingham and Easton. The large scale of proposed development at this site would be likely to alter views experienced by existing local residents of surrounding dwellings to some extent. Therefore, a minor negative impact on the local landscape would be expected.
- B.2.3.17 Urbanisation of the Countryside:** Site GNLP0415R comprises a large area of previously undeveloped land outside of the existing settlements of Easton and Honingham. Therefore, the proposed development at this site could potentially contribute towards the urbanisation of the countryside. A minor negative impact on the local landscape would be expected.
- B.2.3.18 Coalescence:** Sites GNLP0415R comprises a large previously undeveloped site, situated between the settlements of Honingham, Easton and Colton. The proposed development at this site would be likely to increase the risk of coalescence between these settlements; therefore, a minor negative impact on the local landscape would be expected.

SA Objective 5 – Housing

- B.2.3.19 Net Gain:** Site GNLP0415R is proposed for the development of approximately 5,232 dwellings; therefore, the proposed development at this site would be expected to result in a major positive impact on housing provision.

SA Objective 6 – Population and Communities

- B.2.3.20 Local Services:** The nearest local services to Site GNLP0415R include Marks and Spencer Foodhall and Sainsbury's, located in Longwater Retail Park. Site GNLP0415R is located outside the target distance to existing services, however, it is anticipated that new shops and services would be provided alongside development of the garden village. Therefore, a minor positive impact could be expected at this site.

SA Objective 7 – Deprivation

- B.2.3.21 At this stage, it is assumed that development proposals at all reasonable alternative sites would have a negligible impact for this objective (see Box 4.7 of the Regulation 19 SA).

SA Objective 8 – Health

- B.2.3.22 **Green Network:** The majority of Site GNLP0415R is located over 600m from a PRoW or public greenspace. However, it is anticipated that new footpaths and public greenspaces would be provided alongside development of the garden village. Therefore, a minor positive impact would be expected at this site.
- B.2.3.23 **Main Road:** Site GNLP0415R is located adjacent to the A47, with a proportion of the site within 200m of this road. The proposed development at this site could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users.
- B.2.3.24 **AQMA:** Site GNLP0415R is located over 200m from the nearest AQMA, and therefore, a minor positive impact would be expected for the health and wellbeing of site end users.
- B.2.3.25 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP0415R is Norfolk and Norwich University Hospital, located approximately 9km to the south east, outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to this essential health facility. Therefore, a minor negative impact would be expected.
- B.2.3.26 **GP Surgery:** The closest GP surgeries to Site GNLP0415R are Beechcroft Surgery, Mattishall Surgery and Hethersett Surgery. Site GNLP0415R is located outside the target distance to these GP surgeries. The proposed development at this site would be expected to have a minor negative impact on the access of site end users to GP surgeries.
- B.2.3.27 **Leisure Centre:** The closest leisure facility to Site GNLP0415R is Riverside Leisure Centre, located approximately 13km to the east. Site GNLP0415R is located outside the target distance to this leisure facility, and therefore, a minor negative impact on the health and wellbeing of site end users would be expected.
- B.2.3.28 As Site GNLP0415R is located outside the target distance to an NHS hospital, GP surgery and leisure centre, the proposed development at this site would be expected to have a major negative impact on the health and wellbeing of site end users.

SA Objective 9 – Crime

- B.2.3.29 At this stage, it is assumed that development proposals at all reasonable alternative sites would have a negligible impact for this objective (see Box 4.9 of the Regulation 19 SA).

SA Objective 10 – Education

- B.2.3.30 **Primary/Secondary School:** The closest primary schools to Easton and Honingham are St Peter's C of E Primary Academy in Easton, Barford Primary School, or Hockering C of E Primary Academy. The closest secondary school is Ormiston Victory Academy, located approximately 6km to the east. Site GNLP0415R is situated outside the target distance to both a primary and secondary school. However, it is anticipated that new schools would be provided alongside development of the garden village. Therefore, a minor positive impact would be expected.

SA Objective 11 – Economy

- B.2.3.31 **Primary Employment Location:** The closest primary employment location to Site GNLP0415R is Longwater Retail Park, located to the east. This location would be expected to provide a range of employment opportunities for site end users. The majority of Site GNLP0415R is located within the target distance to this employment location. Furthermore, it is anticipated that new employment opportunities would be provided alongside development of the garden village; therefore, overall, a major positive impact on the local economy would be expected.

SA Objective 12 – Transport and Access to Services

- B.2.3.32 **Bus Stop:** The majority of Site GNLP0415R is located outside the target distance to bus stops providing regular services. However, it is anticipated that new bus stops would be provided alongside development of the garden village. Therefore, a minor positive impact could be expected at this site.
- B.2.3.33 **Railway Station:** The closest railway station to Site GNLP0415R is Norwich Railway Station, located approximately 9.6km to the east, outside of the sustainable target distance. Therefore, the proposed development at this site would be likely to have a minor negative impact on site end users' access to rail services.
- B.2.3.34 **Pedestrian Access:** Site GNLP0415R currently has poor access to the surrounding footpath network. However, it is anticipated that safe pedestrian links would be provided alongside development of the garden village. Therefore, a minor positive impact could be expected at this site.
- B.2.3.35 **Road Network:** Site GNLP0415R is well connected to the existing road network. The proposed development would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on accessibility.

SA Objective 13 – Historic Environment

- B.2.3.36 **Grade I Listed Buildings:** Site GNLP0415R is located approximately 90m from the Grade I Listed Building 'Church of St Peter', situated to the north east of the site in the outskirts of Easton. The proposed development at this site would be likely to alter the setting of this Listed Building, and therefore, a minor negative impact on the local historic environment would be expected.

B.2.3.37 Grade II* Listed Buildings: Site GNLP0415R is located approximately 60m from the Grade II* Listed Building 'Church of St Andrew', situated to the north of the site. The proposed development at this site would be likely to alter the setting of this Listed Building, and therefore, a minor negative impact on the local historic environment would be expected.

B.2.3.38 Grade II Listed Buildings: There are several Grade II Listed Buildings situated in the open countryside surrounding Site GNLP0415R. This includes 'Church Farm House' and 'Barn at Church Farm' situated approximately 150m to the north, 'Greenacres Farm House' approximately 200m to the north west, and four Listed Buildings 'The Old Horse and Groom', 'Malthouse', 'The Old Hall' and 'Barn, The Old Hall' approximately 350m to the west. The proposed development at this site could potentially alter the setting of these Listed Buildings, and therefore, a minor negative impact on the local historic environment would be expected.

SA Objective 14 – Natural Resources, Waste & Contaminated Land

B.2.3.39 Waste: Site GNLP0415R is proposed for the development of approximately 5,232 dwellings, and therefore, would be expected to increase household waste production by more than 1% in comparison to current levels in Broadland / South Norfolk. The proposed development at this site could potentially have a major negative impact on waste generation.

B.2.3.40 Previously Developed Land: Site GNLP0415R comprises approximately 353.45ha of previously undeveloped land, of which approximately 278.47ha could be proposed for employment or residential development. The proposed development would be likely to result in a major negative impact on natural resources due to the loss of 20ha or more of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

B.2.3.41 ALC: Site GNLP0415R is situated on ALC Grade 2 and 3 land. Grade 2, and potentially Grade 3, represent some of Greater Norwich's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at this site, due to the loss of this important natural resource.

SA Objective 15 – Water

B.2.3.42 SPZ: Site GNLP0415R coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources.

B.2.3.43 Watercourse: A small proportion of Site GNLP0415R is located within 200m of the River Tud. The proposed development at this site could potentially increase the risk of contamination of this watercourse, and therefore, a minor negative impact would be expected.

B.3 Post-Mitigation Assessment

B.3.1 Previous SA assessment findings

B.3.1.1 Following careful consideration of the mitigation effects of the strategic policies and Local Plan DM policies on the assessment findings, the post-mitigation assessment findings for all reasonable alternative sites considered throughout the GNLP preparation, including Sites GNLP0415R-A to G, were presented in the Regulation 19 SA Report (Appendix E)⁹.

B.3.1.2 **Table B.3.1** provides an overview of the SA findings for Sites GNLP0415R-A to G, extracted from the Regulation 18 and 19 SA Reports, per SA Objective. For the full methodology and assessment of sites carried out during the SA process, please refer to the Regulation 19 SA Report.

Table B.3.1: Impact matrix for Site GNLP0415R when considered as individual site components (post-mitigation)

Site Reference	SA Objective														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity, Geodiversity & GI	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport & Access to Services	Historic Environment	Natural Resources, Waste & Contaminated Land	Water
GNLP0415R-A	-	-	-	-	++	0	+	--	+	-	+	-	0	-	0
GNLP0415R-B	-	+	-	-	0	0	+	--	+	0	++	-	0	-	0
GNLP0415R-C	-	+	-	-	0	0	+	--	+	0	++	-	0	-	0
GNLP0415R-D	-	-	-	-	++	0	+	--	+	-	+	-	0	-	0
GNLP0415R-E	0	0	+	+	0	0	0	+	0	0	0	0	0	0	0
GNLP0415R-F	0	0	+	+	0	0	0	+	0	0	0	0	0	0	0
GNLP0415R-G	-	-	-	-	++	0	+	--	+	-	0	-	0	-	0

B.3.2 Assessment of combined site GNLP0415R

B.3.2.1 **Table B.3.2** provides an overview of the SA findings post-mitigation for the re-assessment of Site GNLP0415R carried out within this appendix, per SA Objective. This assessment is based on the same methodology as used for other reasonable alternative sites during the SA process.

⁹ Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan Volume 3 of 3: Appendices, January 2021. Available at: https://www.gnlp.org.uk/sites/gnlp/files/2021-01/LC-663_Vol_3of3_Appendices_3_250121LB_compressed%20Jan%202021.pdf [Date Accessed: 15/06/22]

Table B.3.2: Impact matrix for Site GNLP0415R when considered as a whole (post-mitigation)

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity, Geodiversity & GI	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport & Access to Services	Historic environment	Natural resources, waste & contaminated land	Water
GNLP0415R	-	-	-	-	++	+	+	--	+	+	++	-	0	-	0

B.3.2.2 The overall post-mitigation performance of Site GNLP0415R when assessed as a whole Garden Village proposal is similar to the largest of the individually assessed site parcels, GNLP0415R-A, as presented in **Table B.3.1**.

B.3.2.3 The differences between the post-mitigation performance of Site GNLP0415R-A and GNLP0415R as a whole relate to SA Objective 6 – Population & Communities, and SA Objective 10 – Education. For these two objectives, a minor positive impact has been identified both pre- and post-mitigation, as the development would be likely to provide new shops and services (see **para B.2.3.20**), and new schools (see **para B.2.3.30**), within the garden village proposal.

B.3.2.4 For the remaining SA Objectives, GNLP0415R performs the same as GNLP0415R-A post-mitigation. For full explanations relating to the post-mitigation assessments, please refer to the Regulation 19 SA Report (Appendix E)¹⁰.

¹⁰ Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan Volume 3 of 3: Appendices, January 2021. Available at: https://www.gnlp.org.uk/sites/gnlp/files/2021-01/LC-663_Vol_3of3_Appendices_3_250121LB_compressed%20Jan%202021.pdf [Date Accessed: 15/06/22]



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