

# Sustainability Appraisal of the Greater Norwich Local Plan Gypsy and Traveller Sites and Policies

## Addendum to the Regulation 19 SA Report

January 2023



**LEPUS** CONSULTING  
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY



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# Sustainability Appraisal of the Greater Norwich Local Plan Gypsy and Traveller Sites and Policies

## Addendum to the Regulation 19 SA Report

LC-806	Document Control Box
Client	Greater Norwich Development Partnership
Report Title	Sustainability Appraisal of the Greater Norwich Local Plan Gypsy and Traveller Sites and Policies: Addendum to the Regulation 19 SA Report
Filename	LC-806_GNLP_G&T_SA_20_120123LB.docx
Status	Final
Date	January 2023
Author	RI & LB
Reviewed	LB & SS
Approved	ND

Front cover: Wymondham Abbey aerial image by John Fielding (<https://tinyurl.com/mujkmn6d>)

# About this report & notes for readers

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This SA Report is based on the best available information, including that provided to Lepus by the Council and information that is publicly available. No attempt to verify these secondary data sources has been made and they have been assumed to be accurate as published. This report was prepared between April 2022 and January 2023 and is subject to and limited by the information available during this time. This report has been produced to assess the sustainability effects of the Gypsy and Traveller Site

Allocations and Policies and meets the requirements of the SEA Directive. It is not intended to be a substitute for an Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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# Abbreviations

<b>ALC</b>	Agricultural Land Classification
<b>AQMA</b>	Air Quality Management Area
<b>DEFRA</b>	Department for Environment, Food and Rural Affairs
<b>DLUHC</b>	Department for Levelling Up, Housing and Communities
<b>EA</b>	Environment Agency
<b>GNDP</b>	Greater Norwich Development Partnership
<b>GNLP</b>	Greater Norwich Local Plan
<b>GP</b>	General Practice
<b>GTAA</b>	Gypsy and Traveller Accommodation Assessment
<b>ha</b>	Hectare
<b>HRA</b>	Habitats Regulations Assessment
<b>IRZ</b>	Impact Risk Zone
<b>km</b>	Kilometre
<b>LCA</b>	Landscape Character Area
<b>LCT</b>	Landscape Character Type
<b>LVIA</b>	Landscape and Visual Impact Assessment
<b>m</b>	Metre
<b>MHCLG</b>	Ministry for Housing, Communities and Local Government
<b>MSA</b>	Mineral Safeguarding Area
<b>NHS</b>	National Health Service
<b>NPPF</b>	National Planning Policy Framework
<b>ODPM</b>	Office of the Deputy Prime Minister
<b>PPG</b>	Planning Policy Guidance
<b>PPP</b>	Plan, Policy and Programme
<b>PRoW</b>	Public Right of Way
<b>SA</b>	Sustainability Appraisal
<b>SAC</b>	Special Area of Conservation
<b>SEA</b>	Strategic Environmental Assessment
<b>SPA</b>	Special Protection Area
<b>SPZ</b>	Source Protection Zone
<b>SSSI</b>	Site of Special Scientific Interest

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# Executive Summary

## About this report

- E1 The Greater Norwich Development Partnership (GNDP) are in the process of preparing the Greater Norwich Local Plan (GNLP), which will include allocations and policies to meet the accommodation needs of Gypsies and Travellers.
- E2 As part of the GNLP process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of Strategic Environmental Assessment (SEA). The purpose of SA/SEA is to help guide and influence the Plan making process for the GNDP by identifying the likely sustainability effects of various reasonable alternative options.
- E3 The Greater Norwich Gypsy and Traveller Accommodation Assessment (GTAA) Report (June 2022)<sup>1</sup> has been prepared to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople within the Plan area, through a review of secondary information, surveys and interviews. The GTAA found that 53 Gypsy and Traveller pitches are required over the Plan period to 2038.
- E4 The GNLP was submitted to the Secretary of State for independent examination on 30<sup>th</sup> July 2021, with examination hearings held between February and March 2022. The Inspectors stated that a focussed consultation on proposed Gypsy and Traveller sites and policies within the GNLP is required. This SA report therefore comprises an appraisal of the 11 reasonable alternative sites and related policies proposed within the GNLP for Gypsies and Travellers within the Plan area.
- E5 SA is the process of informing and influencing the preparation of a Local Plan to optimise its sustainability performance. SA considers the social, economic and environmental performance of the Plan.

## Summary findings

- E6 A total of 11 reasonable alternative sites proposed for permanent Gypsy and Traveller pitches have been identified across Greater Norwich. These sites have been assessed within this SA report, based on the same methodology that has been used throughout the SA process for the assessment of housing, employment and mixed-use sites.
- E7 The SA has identified a range of positive and negative potential impacts of the reasonable alternative sites on the objectives within the SA Framework, pre-mitigation. Negative impacts were mainly related to issues associated with the location of development outside of sustainable target distances to services such as schools and healthcare facilities, and the potential for threats or pressures to environmental assets including biodiversity features,

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<sup>1</sup> RRR Consultancy Ltd (2022) Greater Norwich Gypsy and Traveller Accommodation Assessment Report, June 2022. Available at: <https://www.gnlp.org.uk/sites/gnlp/files/2022-06/Greater%20Norwich%20GTAA%20Final%20Report%20June%202022.pdf> [Date accessed: 21/06/22]



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- watercourses and the loss of ecologically or agriculturally valuable soil associated with development on previously undeveloped land. Positive impacts were identified relating to the provision of pitches to contribute towards meeting accommodation needs for Gypsies and Travellers, and the location of sites away from areas of fluvial flood risk.
- E8 Some (but not all) of the identified negative impacts may be mitigated through policy and site design.
- E9 The GNDP's preferred sites for allocation within the emerging GNLG 'Site Policies for Gypsy and Traveller Permanent Residential Pitches Focused Consultation' document are Sites GNLG5004, GNLG5005, GNLG5009, GNLG5014, GNLG5019, GNLG5020, GNLG5021, GNLG5022, GNLG5023 and GNLG5024. Site GNLG5013 is proposed as a reasonable alternative. Each site has an accompanying site policy which has been prepared to address site-specific issues alongside the proposed allocation.
- E10 The 11 reasonable alternative Gypsy and Traveller sites perform similarly overall in the SA. Following consideration of policy mitigation, the SA has identified residual positive, negligible and negative effects against some SA Objectives.
- E11 The best performing option could be identified as Site GNLG5013, because after the potential mitigating influence of the GNLG policies is taken into account, no major negative scores are identified, and positive scores are identified overall for seven of the 15 SA Objectives. However, the assessment of this site has also identified the potential for minor negative impacts across five SA Objectives. Site GNLG5005 also performs relatively well, with positive scores for seven SA Objectives but five minor negative scores.
- E12 There is a degree of uncertainty regarding effects on biodiversity (SA Objective 3) owing to the emerging mitigation strategy regarding nutrient neutrality issues within Norfolk. Site GNLG5023 wholly coincides with priority habitat, and as such, there is also uncertainty regarding the potential to mitigate the proposed development at this location.
- E13 Where relevant, the SA has identified some recommendations to enhance or strengthen the proposed site allocation policies.



## Next steps

- E14 This SA Report has been prepared as an addendum to the Regulation 19 SA Report, and will undergo a 6-week public consultation period between January and March 2023.
- E15 This SA Report is undergoing a focused consultation alongside the 'Site Policies for Gypsy and Traveller Permanent Residential Pitches Focused Consultation' document, the Gypsy and Traveller Site Assessment Booklet, HELAA Addendum and the HRA.
- E16 Following the consultation period, responses will be considered by the Councils to inform the emerging GNLP as the examination stage progresses.

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# 1 Introduction

## 1.1 Context

- 1.1.1 Lepus Consulting is conducting the Sustainability Appraisal (SA) process for the Greater Norwich Local Plan (GNLP), including Gypsy and Traveller sites and policies, on behalf of Greater Norwich Development Partnership (GNDP) which includes Broadland District Council, Norwich City Council and South Norfolk Council.
- 1.1.2 The Submission Version of the GNLP was submitted to the Secretary of State for independent examination on 30<sup>th</sup> July 2021. Between 1<sup>st</sup> February and 22<sup>nd</sup> March 2021, the GNDP underwent public consultation on the Regulation 19 Pre-Submission Draft Version of the GNLP<sup>2</sup>, with examination hearings held between February and March 2022. This version of the GNLP was supported by a Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) report<sup>3</sup>, which satisfied the requirements of an 'Environmental Report' as per the SEA Regulations<sup>4</sup> (from here on referred to as the Regulation 19 SA Report).
- 1.1.3 SA is the process of informing and influencing the preparation of a Local Plan to maximise sustainability value. SA is integrated with the SEA process so that the requirements of both assessments are prepared simultaneously. The purpose of SA/SEA is to help guide and influence the plan-making process for GNDP by identifying the likely environmental, social and economic effects of various reasonable alternative sites and policies.
- 1.1.4 This document comprises an Addendum to the Regulation 19 SA Report<sup>5</sup>, focusing on the assessment of proposed Gypsy and Traveller sites, which has been prepared in order to address a request made by the Planning Inspectors during the examination.
- 1.1.5 The GNDP have identified 11 reasonable alternative Gypsy and Traveller sites within South Norfolk and Broadland Districts, with potential pitch delivery ranging from two to 18 pitches per site.
- 1.1.6 Additionally, the Councils have prepared site policies which seek to facilitate the allocation of the ten preferred Gypsy and Traveller sites and their development management within the emerging GNLP, as follows: Policies GNLP5004, GNLP5005, GNLP5009, GNLP5014, GNLP5019, GNLP5020, GNLP5021, GNLP5022, GNLP5023 and GNLP5024.

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<sup>2</sup> GNLP (2021) Regulation 19 Publication Information. Available at: <https://www.gnlp.org.uk/regulation-19-publication-part-1-strategy/regulation-19-publication-information-not-part-plan> [Date accessed: 06/08/21]

<sup>3</sup> Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (Volumes 1-3) January 2021. Available at: <https://www.gnlp.org.uk/regulation-19-publication/evidence-base> [Date accessed: 06/08/21]

<sup>4</sup> The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 20/06/22]

<sup>5</sup> Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan. Volume 2 of 3: Regulation 19 SA Report. 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](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: 14/04/22]

1.1.7 The Councils have also prepared a site policy for one site, GNLP5013, which is not preferred at this stage but may come forward in future. Policy GNLP5013 is proposed as a reasonable alternative for allocation.

1.1.8 This SA report has appraised the 11 reasonable alternative sites and accompanying site policies in terms of sustainability performance using the SA Framework as set out in **Appendix A**. This will help the GNDP to identify potential mitigation or improvements which could be made to the policies at this stage, in order to help ensure the GNDP have chosen the most sustainable options.

## 1.2 Greater Norwich

1.2.1 Lepus Consulting has been commissioned by the GNDP to review the GNLP Gypsy and Traveller sites and policies, through the SA process. The GNDP are working with Norfolk County Council and consist of the following:

- Broadland District Council;
- Norwich City Council; and
- South Norfolk District Council.

1.2.2 Greater Norwich comprises the three districts of Norwich, Broadland and South Norfolk (see **Figure 1.1**). The districts of Broadland and South Norfolk are predominantly rural in nature, with isolated towns and villages separated by large areas of open farmland. The Broads National Park, a nationally important landscape, is located to the east of the Greater Norwich Local Plan area. The Broads is a visually and culturally distinctive part of Norfolk. The River Yare, River Bure and River Waveney form the district boundaries between Broadland and South Norfolk.

1.2.3 The city of Norwich is a major regional centre for employment, tourism and culture and is Norfolk's highest-ranking retail centre. Within the district there are numerous primary and secondary educational facilities. Besides schools, there are a number of higher and further education centres, including the University of East Anglia, Norwich University College of the Arts, City College and Easton College.

1.2.4 The GNLP will guide development across the three districts up to 2038, providing both strategic policies and site allocations to meet demand for housing and employment, Gypsy and Traveller pitches, as well as other land use matters. It is being produced by the three councils of Broadland, Norwich and South Norfolk, supported by Norfolk County Council. It takes the adopted Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk, which covers all three districts from 2008 up to 2026, as its starting point.

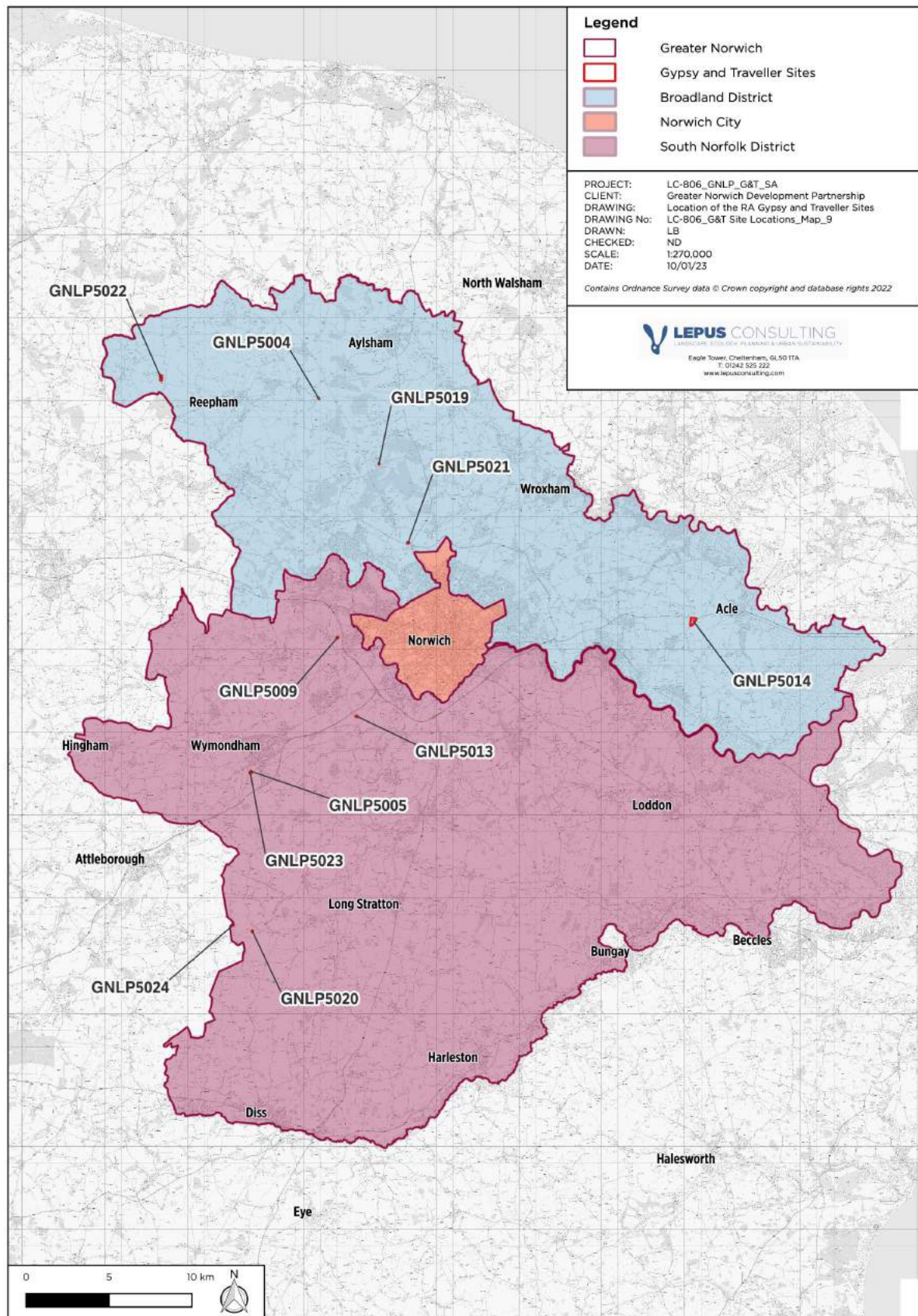


Figure 1.1: District boundaries within Greater Norwich and location of reasonable alternative Gypsy and Traveller sites

## 1.3 Gypsy and Traveller Accommodation Needs Assessment

- 1.3.1 The Greater Norwich Gypsy and Traveller Accommodation Assessment (GTAA) Report (June 2022)<sup>6</sup> has been prepared to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople within the Plan area, through a review of secondary information, surveys and interviews.
- 1.3.2 In accordance with planning policy for traveller sites<sup>7</sup>, Gypsies and Travellers are defined as *“persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such”*.
- 1.3.3 Travelling Showpeople are defined as *“members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above”*<sup>8</sup>.
- 1.3.4 When taking into account this new evidence alongside recent planning permissions, the GTAA found that 53 Gypsy and Traveller pitches are required by the end of the Plan period in 2038.

## 1.4 Integrated approach to SA and SEA

- 1.4.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.
- 1.4.2 The European Union Directive 2001/42/EC<sup>9</sup> (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types).
- 1.4.3 The objective of the SEA procedure can be summarised as follows: *“the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”*.

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<sup>6</sup> RRR Consultancy Ltd (2022) Greater Norwich Gypsy and Traveller Accommodation Assessment Report, June 2022. Available at: <https://www.gnlp.org.uk/sites/gnlp/files/2022-06/Greater%20Norwich%20GTAA%20Final%20Report%20June%202022.pdf> [Date accessed: 21/06/22]

<sup>7</sup> MHCLG (2015) Planning policy for traveller sites. Available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites> [Date accessed: 22/04/22]

<sup>8</sup> Ibid

<sup>9</sup> Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 (SEA Directive). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date accessed: 22/04/22]



- 1.4.4 The Directive has been transposed into English law by the SEA Regulations (SI no. 1633). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the GNLP to be subject to SEA throughout its preparation.
- 1.4.5 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by s19(5) of the planning and Compulsory Purchase Act 2004<sup>10</sup> and should be an appraisal of the economic, social and environmental sustainability of development plans.
- 1.4.6 The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012<sup>11</sup>. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.

## 1.5 Best Practice Guidance

- 1.5.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal process, which incorporates the requirements of the SEA Directive. This can be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment<sup>12</sup>;
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive<sup>13</sup>;
- Ministry of Housing, Communities and Local Government (2018) National Planning Policy Framework (NPPF)<sup>14</sup>;
- Ministry of Housing, Communities and Local Government (2018) Planning Practice Guidance (PPG)<sup>15</sup>; and

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<sup>10</sup> Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 22/04/22]

<sup>11</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012. Available at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> [Date accessed: 22/04/22]

<sup>12</sup> European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: [http://ec.europa.eu/environment/archives/eia/pdf/030923\\_sea\\_guidance.pdf](http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf) [Date accessed: 22/04/22]

<sup>13</sup> Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf) [Date accessed: 22/04/22]

<sup>14</sup> Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 22/04/22]

<sup>15</sup> Ministry of Housing, Communities and Local Government (2019) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 22/04/22]



- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans<sup>16</sup>.

## 1.6 Sustainability Appraisal

- 1.6.1 The preparation of the GNLP has been supported by a sustainability appraisal process. This document is a component of the SA of the GNLP, comprising the SA of Gypsy and Traveller sites and policies.
- 1.6.2 SA is the process of informing local development plans to maximise their sustainability value and is a statutory requirement when preparing development plan documents. The SA process provides a soundness test for development plan documents, the key objective of which is to promote sustainable development.
- 1.6.3 The SA process has followed the Local Plan making process on an iterative basis. Consequently, there are several SA documents that have been prepared. The Regulation 19 SA Report meets the requirements of the SEA Regulations, and all earlier work is clearly referenced in the Regulation 19 SA Report and is available on the GNLP website<sup>17</sup>. **Table 1.1** sets out the iterative timeline of the Local Plan and SA/SEA processes.

**Table 1.1:** Timeline of SA documents in relation to the GNLP stages of preparation

Date	Local Plan Stage	Sustainability Appraisal
March 2017		<b>SA Scoping Report (GNDP)</b> Identified the scope for the SA, set out the context, 15 SA Objectives and approach of the assessment.
January to March 2018	<b>Stage A Regulation 18 Consultation of Site Proposals, Growth Options and the Interim Sustainability Appraisal</b>	<b>Interim Sustainability Appraisal (GNDP)</b> This report assessed the GNLP options for growth, which included six options for the spatial strategy and policy options.
October to December 2018	<b>Stage B Regulation 18 Site Proposals Addendum and HELAA Addendum</b>	No SA report prepared.
January to March 2020	<b>Stage C Regulation 18 Draft Strategy consultation</b> Draft strategy including vision, objectives and strategic policies, a sites document and supporting evidence documents.	<b>Regulation 18C SA Report (Lepus)</b> This report assessed 285 reasonable alternative sites and eleven draft strategic policies.
February to March 2021	<b>Publication Draft Plan</b> The GNLP is split into two documents: The Strategy and Site Allocations. The Strategy Document sets out the profile of Greater Norwich, the Plan vision and objectives, and the strategic policies. The Site Allocations Document sets out the site allocations of the GNLP.	<b>Regulation 19 SA Report (Lepus)</b> The Regulation 19 SA Report summarised the SA process to date and helped inform the examination stage of the preparation of the GNLP. The Regulation 19 SA presented the findings of the sustainability appraisal of the GNLP, which is composed principally of twelve strategic policies and 138 site policies. This

<sup>16</sup> Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <http://www.rtpi.org.uk/media/2668152/sea-sapracticeadvicefull2018c.pdf> [Date accessed: 22/04/22]

<sup>17</sup> Greater Norwich Local Plan. Available at: <https://www.gnlp.org.uk/growing-stronger-communities-together> [Date accessed: 20/06/22]

Date	Local Plan Stage	Sustainability Appraisal
September 2021		<p>report also contained an assessment of an additional 107 reasonable alternative sites.</p> <p><b>Consultation response: Addendum to the Regulation 19 SA/SEA Report (Lepus)</b></p> <p>The Addendum sought to address consultation responses related to the SA/SEA received by the GNLP during the Regulation 19 consultation, specifically in relation to the testing of reasonable alternatives and selection process for the chosen spatial strategy and distribution of growth in the Plan area.</p>
December 2021		<p><b>Inspectors' Initial Questions: Reasonable Alternatives for Housing Number Options. Addendum to the Regulation 19 SA/SEA Report (Lepus)</b></p> <p>Prepared in response to the Inspectors' Initial Question 7 which asked for an addendum to the SA to be produced, relating to the housing growth numbers, and addressing "<i>both smaller and minimal supply buffers as 'reasonable alternatives'</i>".</p>
June 2022		<p><b>Note in response to Inspectors' questions relating to the Sustainability Appraisal of potential development Sites (Lepus)</b></p> <p>An SA note has been prepared to address site specific issues raised in representations made in writing or in person at the EiP Part 1 Hearings.</p>
January to March 2023	<p><b>Site Policies for Gypsy and Traveller Permanent Residential Pitches Focused Consultation</b></p> <p>The consultation document sets out possible sites to provide residential pitches for Gypsies and Travellers.</p>	<p><b>SA of the GNLP Gypsy and Traveller Sites and Policies: Addendum to the Regulation 19 SA/SEA Report (Lepus)</b></p> <p>This SA Addendum presents the assessment of 11 reasonable alternative Gypsy and Traveller sites and accompanying site allocation policies.</p>

## 1.7 GNLP Gypsy and Traveller Sites and Policies

1.7.1 The GNLP have identified 11 reasonable alternative Gypsy and Traveller sites, listed in **Table 1.2**.

*Table 1.2: Reasonable alternative sites considered within this SA report*

Site Reference	Site Name	Gypsy and Traveller Site Area (ha)	Total Site Area (ha)	Proposed No. of Pitches
GNLP5004	Land off Buxton Road, Eastgate	0.12	0.12	4
GNLP5005	Wymondham Recycling Centre, Strayground Lane	0.07	0.07	2
GNLP5009	Hockering Lane	0.59	0.59	6
GNLP5013	Ketteringham Recycling Centre (revised area)	0.70	0.70	10
GNLP5014	Land adjacent to A47	1.00	2.48	15
GNLP5019	Land at Woodland Stable, Shortthorn Road, Stratton Strawless	0.33	0.33	4
GNLP5020	Land at Romany Meadow, The Turnpike, Carleton Rode	0.54	0.54	6
GNLP5021	The Old Produce Shop, Holt Road, Horsford	0.90	0.90	6
GNLP5022	The Oaks, Foulsham	3.19	3.19	5
GNLP5023	Strayground Lane, Wymondham	1.19	1.19	10
GNLP5024	Uagate Street, Carleton Rode	0.62	0.62	4

1.7.2 10 reasonable alternative sites are preferred for allocation within the GNLP: GNLP5004, GNLP5005, GNLP5009, GNLP5014, GNLP5019, GNLP5020, GNLP5021, GNLP5022, GNLP5023 and GNLP5024. Site GNLP5013 as a reasonable alternative. Site policies have been prepared by the Councils which set out requirements for the development proposals relating to each site. These site-specific policies have been assessed within **Chapter 4** of this report.

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## 1.8 Signposting for this report

- 1.8.1 **Chapter 2** of this report sets out the methodology used to present and assess the findings of the SA process.
- 1.8.2 **Chapter 3** of this report presents the findings of the appraisal of the 11 reasonable alternative Gypsy and Traveller sites, pre-mitigation.
- 1.8.3 **Chapter 4** of this report presents the assessment of the 11 Gypsy and Traveller site policies.
- 1.8.4 **Chapter 5** of this report outlines the potential mitigating influence of GNLP policies and post-mitigation assessment of the reasonable alternative Gypsy and Traveller sites.
- 1.8.5 **Chapter 6** sets out the site identification process that has been undertaken and the reasons for rejection and selection of each reasonable alternative site.
- 1.8.6 **Chapter 7** outlines the next steps of the SA process.

## 2 Methodology

### 2.1 Assessment of Reasonable Alternatives

- 2.1.1 The purpose of this document is to provide an appraisal of the GNLP development proposals and policies prepared by GNPD in line with the SEA Regulations.
- 2.1.2 Regulation 12 of the SEA Regulations<sup>18</sup> states that the Environmental Report “*shall identify, describe and evaluate the likely significant effects of the environment of – (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme*”.
- 2.1.3 Each of the sites and policies appraised in this report has been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework is presented in its entirety in **Appendix A**.
- 2.1.4 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations<sup>19</sup>. Including the SEA topics in the SA Objectives helps ensure that all environmental criteria of the SEA Regulations are represented. Consequently, the SA Objectives reflect all subject areas to ensure the assessment process is transparent, robust and thorough.
- 2.1.5 It is important to note that the order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to focus each objective, decision-making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.
- 2.1.6 A single value from **Table 2.1** is allocated to each SA Objective for each site and policy. Justification for the score is presented in an accompanying narrative assessment text. The assessment of a significant effect is in accordance with the SEA Regulations which states that, where feasible, effects considered should include “*short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects*”.

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<sup>18</sup> The Environmental Assessment of Plans and Programmes Regulations 2004. Regulation 12. Available at: <https://www.legislation.gov.uk/uksi/2004/1633/regulation/12/made> [Date accessed: 16/05/22]

<sup>19</sup> Biodiversity flora and fauna; Population; Human health; Soil; Water; Air; Climatic factors; Material assets; Cultural heritage (including architectural and archaeological heritage); and Landscape.

**Table 2.1:** Guide to scoring significant effects

Significance	Definition (not necessarily exhaustive)
<b>Major Negative</b> --	The size, nature and location of a reasonable alternative would be likely to: <ul style="list-style-type: none"> <li>• Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance;</li> <li>• Cause a very high-quality receptor to be permanently diminished;</li> <li>• Be unable to be entirely mitigated;</li> <li>• Be discordant with the existing setting; and/or</li> <li>• Contribute to a cumulative significant effect.</li> </ul>
<b>Minor Negative</b> -	The size, nature and location of a reasonable alternative would be likely to: <ul style="list-style-type: none"> <li>• Not quite fit into the existing location or with existing receptor qualities; and/or</li> <li>• Affect undesignated yet recognised local receptors.</li> </ul>
<b>Negligible</b> 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
<b>Uncertain</b> +/-	It is entirely uncertain whether impacts would be positive or adverse.
<b>Minor Positive</b> +	The size, nature and location of a reasonable alternative would be likely to: <ul style="list-style-type: none"> <li>• Improve undesignated yet recognised receptor qualities at the local scale;</li> <li>• Fit into, or with, the existing location and existing receptor qualities; and/or</li> <li>• Enable the restoration of valued characteristic features.</li> </ul>
<b>Major Positive</b> ++	The size, nature and location of a reasonable alternative would be likely to: <ul style="list-style-type: none"> <li>• Enhance and redefine the location in a positive manner, making a contribution at a national or international scale;</li> <li>• Restore valued receptors which were degraded through previous uses; and/or</li> <li>• Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.</li> </ul>

2.1.7 When selecting a single value to best represent the environmental performance of the relevant SA Objective, the precautionary principle is used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SA Framework (see the second column of the SA Framework in **Appendix A**) and a negative effect is identified in relation to another criterion within the same SA Objective, the overall score will be negative for that objective.

2.1.8 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without detrimental effects on known receptors (identified in the baseline).

## 2.2 Significance

- 2.2.1 Where an environmental impact has been identified, the significance of effect has been categorised as minor or major. **Table 2.1** lists the significance matrix and explains the terms used. The nature of the significant effect can be either beneficial or adverse depending on the type of development and the design and mitigation measures proposed.
- 2.2.2 Each reasonable alternative site that has been identified in this report has been assessed for its likely significant effect against each SA Objective in the Framework, as per **Table 2.1**. Scores are not intended to be summed.
- 2.2.3 It is important to note that the scores are high level indicators. The narrative assessment text which details the key decision-making criteria behind each awarded score should always read alongside the score. Assumptions and limitations in **Table 2.4** and **section 2.7** offer further insight into how each score was arrived at.
- 2.2.4 Significance of effect is a combination of impact sensitivity and magnitude.

## 2.3 Impact sensitivity

- 2.3.1 Impact sensitivity is measured through consideration as to how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability of the area, whether or not environmental quality standards will be exceeded, and if impacts will affect designated areas or landscapes.
- 2.3.2 A guide to the range of scales used in the impact significance matrix is presented in **Table 2.2**. For most receptors, sensitivity increases with geographic scale.

*Table 2.2: Geographic scales of receptors*

Scale	Typical criteria
International/ national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

## 2.4 Impact magnitude

- 2.4.1 Impact magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude is determined based on the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 2.3**).



**Table 2.3: Impact magnitude**

Impact magnitude	Typical criteria
High	Likely total loss of or major alteration to the receptor in question; <ul style="list-style-type: none"> <li>• Provision of a new receptor/feature; or</li> <li>• The impact is permanent and frequent.</li> </ul>
Medium	Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: <ul style="list-style-type: none"> <li>• Frequent and short-term;</li> <li>• Frequent and reversible;</li> <li>• Long-term (and frequent) and reversible;</li> <li>• Long-term and occasional; or</li> <li>• Permanent and occasional.</li> </ul>
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: <ul style="list-style-type: none"> <li>• Reversible and short-term;</li> <li>• Reversible and occasional; or</li> <li>• Short-term and occasional.</li> </ul>

## 2.5 Distances

2.5.1 Where distances have been measured, these are ‘as the crow flies’ from the furthest edge of the site unless specified otherwise. Site end users require access to a range of facilities and amenities. Some distances that are considered to be sustainable in this regard are based on Barton, Grant and Guise (2010) *Shaping Neighbourhoods for Local Health and Global Sustainability*<sup>20</sup>.

## 2.6 Limitations of predicting effects

2.6.1 SA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates professional judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.

2.6.2 The assessments in this report are based on the best available information, including that provided to us by GNDP and information that is publicly available. The assessment of reasonable alternatives is somewhat limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available. Every attempt has been made to predict effects as accurately as possible.

<sup>20</sup> Barton, H., Grant. M. & Guise. R. (2010) *Shaping Neighbourhoods: For local health and global sustainability*, January 2010.

2.6.3 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all reasonable alternatives must be assessed in the same way.

## 2.7 Assessment assumptions

2.7.1 A number of assumptions are inherent to the appraisal process for specific SA Objectives (see **Table 2.4**). These should be borne in mind when considering the assessment findings.

**Table 2.4:** Assumptions for each SA objective.

SA Objective	Assessment Assumptions/Methodology
<p><b>1. Air Quality and Noise:</b> Minimise air, noise and light pollution to improve wellbeing.</p>	<p>Exposure of new residents to air pollution has been considered in the context of development proposal location in relation to established Air Quality Management Areas (AQMAs) and main roads. It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution i.e. the road carriageway. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, “beyond 200m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant”<sup>21</sup>. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers<sup>22 23</sup>.</p> <p>The proximity of a development proposal in relation to a main road (defined as a motorway or A-road) determines the exposure level of site end users to road related air and noise emissions<sup>24</sup>. In line with the DMRB guidance, it is assumed that site end users would be most vulnerable to these impacts within 200m of a main road. This distance has therefore been applied throughout this assessment to both existing road and rail sources. Development proposals located within 200m of a main road would be expected to have a minor negative impact on local residents’ exposure to air and noise pollution. Development proposals located over 200m from a main road would be expected to have a negligible impact on local residents’ exposure to air and noise pollution.</p> <p>Development proposals located within 200m of a railway line would be expected to have a minor negative impact on local residents’ exposure to noise pollution and vibrations. Development proposals located over 200m from a railway line would be expected to have a negligible impact on local residents’ exposure to noise pollution and vibrations.</p> <p>Due to the extent and nature of the development (Gypsy &amp; Traveller pitches) it is assumed that development proposals would have a negligible impact on the generation of air pollution in the Plan area.</p>

<sup>21</sup> Department for Transport (2022) TAG unit A3 Environmental Impact Appraisal. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf) [Date accessed: 22/06/22]

<sup>22</sup> Bignal, K., Ashmore, M & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

<sup>23</sup> Ricardo-AEA (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.

<sup>24</sup> Design Manual for Roads and Bridges (2019) Sustainability & Environment Appraisal: LA 105 Air quality. Available at: <https://www.standardsforhighways.co.uk/dmrb/search/10191621-07df-44a3-892e-c1d5c7a28d90> [Date accessed: 22/06/22]

SA Objective	Assessment Assumptions/Methodology
<p><b>2. Climate Change Mitigation and Adaptation:</b>                      Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change.</p>	<p><b>Carbon Emissions</b></p> <p>At this stage, the nature and design of Gypsy and Traveller pitches which could be developed at each site is unknown. Therefore, increases in greenhouse gas (GHG) emissions as a result of the construction and occupation of dwellings is unknown.</p> <p>Due to the extent and nature of the development (pitches for Gypsies &amp; Travellers) it is assumed that development proposals would have a negligible impact on Greater Norwich's contributions to climate change.</p> <p><b>Fluvial Flooding</b></p> <p>The level of fluvial flood risk present across the Plan area is based on the Environment Agency's flood risk data<sup>25</sup>, such that:</p> <ul style="list-style-type: none"> <li>• Flood Zone 3: 1%+ chance of flooding each year;</li> <li>• Flood Zone 2: 0.1% - 1% chance of flooding each year; and</li> <li>• Flood Zone 1: Less than 0.1% chance of flooding each year.</li> </ul> <p>It is assumed that development proposals will be in perpetuity and it is therefore likely that development will be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of fluvial flooding.</p> <p>Where development proposals coincide with Flood Zone 2, a minor negative impact would be expected. Where development proposals coincide with Flood Zone 3 (either Flood Zone 3a or 3b), a major negative impact would be expected. Where development proposals are located within Flood Zone 1, a minor positive impact would be expected for climate change adaptation.</p> <p><b>Surface Water Flooding</b></p> <p>Areas determined to be at high risk of surface water (pluvial) flooding have more than a 3.3% chance of flooding each year, medium risk between 1% and 3.3%, and low risk between 0.1% and 1% chance.</p> <p>Development proposals located in areas at low and medium risk of surface water flooding would be expected to have a minor negative impact on surface water flooding.</p> <p>Development proposals located within areas at high risk of surface water flooding would be expected to have a major negative impact on surface water flooding.</p> <p>Where development proposals are not located in areas determined to be at risk of surface water flooding, a negligible impact would be expected for climate change adaptation.</p> <p>It is assumed that development proposals will be in perpetuity, and it is therefore likely that development would be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of surface water flooding.</p>
<p><b>3. Biodiversity, Geodiversity and Green Infrastructure:</b>                      Protect and enhance the area's biodiversity and geodiversity assets</p>	<p>Where a development proposal is coincident with, adjacent to or located in proximity to an ecological or geological receptor, it is assumed that negative effects associated with development will arise to some extent. These negative effects include those that occur during the construction phase and are associated with the construction process and construction vehicles (e.g. habitat loss, habitat fragmentation, habitat degradation, noise, air, water and light pollution) and those that are associated with the operation/occupation phases of development (e.g. public access associated disturbances, increases in local congestion resulting in a reduction in air quality, changes in noise levels, visual disturbance, light pollution, impacts on water levels and quality etc.).</p>

<sup>25</sup> Environment Agency (2013) Flood Map for Planning Risk. Available at: <http://apps.environment-agency.gov.uk/wiyby/cv/151263.aspx>  
 [Date accessed: 22/06/22]

SA Objective	Assessment Assumptions/Methodology
<p>and expand the provision of green infrastructure.</p>	<p>Negative impacts would be expected where the ecological or geological designations listed above may be harmed or lost as a result of proposals. The assessment is largely based on a consideration of the proximity of a site and the attributes and qualities of the receptor in question.</p> <p>For the purposes of this assessment, impacts on priority habitats protected under the 2006 NERC Act<sup>26</sup> have been considered in the context of Natural England’s publicly available Priority Habitat Inventory database<sup>27</sup>. It is acknowledged this may not reflect current local site conditions in all instances.</p> <p>It is assumed that construction and occupation of previously undeveloped greenfield land would result in a net reduction in vegetation cover and Green Infrastructure in the Plan area. Development proposals which would be likely to result in the loss of greenfield land are therefore expected to contribute towards a cumulative loss in vegetation cover. This would also be expected to lead to greater levels of fragmentation and isolation across the wider ecological network, such as the loss of habitat stepping-stones and corridors. This can restrict the ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land is considered under the Natural Resources objective (SA Objective 14) in this assessment.</p> <p>It should be noted that no detailed ecological surveys have been completed by Lepus to inform the assessments made in this report.</p> <p>Protected species survey information is not generally available for the sites within the Plan area. It is acknowledged that data is available from the local biological records centre. However, it is noted that this data may be under-recorded in certain areas. This under-recording does not imply species absence. As a consequence, consideration of this data on a site-by-site basis within this assessment would have the potential to skew results – favouring well recorded areas of the Plan area. As such, it has not been possible to assess impacts on protected species in a fair and consistent basis at the site level using primary survey data.</p> <p>It is anticipated that the GNDP will require detailed ecological surveys and assessments to accompany future planning applications. Such surveys will determine on a site-by-site basis the presence of Priority Species and Priority Habitats protected under the NERC Act.</p> <p>It is assumed that the loss of biodiversity assets, such as ancient woodland or an area of priority habitat, are permanent effects.</p> <p>It is assumed that mature trees and hedgerows will be retained where possible.</p> <p>Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country. IRZs are a Geographical Information System (GIS) tool which allow a rapid initial assessment of the potential risks posed by development proposals to: SSSIs, SACs, SPAs and Ramsar sites. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts<sup>28</sup>. It should be noted that IRZ</p>

<sup>26</sup> Natural Environment and Rural Communities Act 2006. Available at: <http://www.legislation.gov.uk/ukpga/2006/16/contents> [Date accessed: 22/06/22]

<sup>27</sup> Natural England (2021) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date accessed: 22/06/22]

<sup>28</sup> Natural England (2022) Natural England’s Impact Risk Zones for Sites of Special Scientific Interest, 08 June 2022. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/sss-i-impact-risk-zones> [Date accessed: 22/06/22]

SA Objective	Assessment Assumptions/Methodology
	<p>classifications are regularly updated by Natural England, and although were correct at the time of writing, may have since been amended.</p> <p>Where development proposals coincide with a Habitats site, a SSSI, NNR, LNR, CWS, CGS or ancient woodland, or are adjacent to a Habitats site, SSSI or NNR, it is assumed that development would have a permanent impact on these nationally important biodiversity and geodiversity assets, and a major negative impact would be expected.</p> <p>Where development proposals coincide with priority habitats, are adjacent to an ancient woodland, LNR, CWS or CGS, are located within a SSSI IRZ which states to “consult Natural England” or are located in close proximity to a Habitats site, SSSI, NNR, LNR or stand of ancient woodland, it is assumed that development would have an impact on these biodiversity and geodiversity assets, and a minor negative impact would be expected.</p> <p>There are numerous Habitats sites located within and in close proximity to the Plan area and various Zones of Influence, primarily relating to nutrient impacts, coincide with the Gypsy and Traveller sites. Advice relating to nutrient neutrality issues has been published in March 2022 by Natural England<sup>29</sup> and DLUHC<sup>30</sup>, which affects a large proportion of the GNLP area, for which a mitigation strategy is currently being developed. The emerging HRA<sup>31</sup> has assessed the potential effects of the Gypsy and Traveller sites in further detail.</p> <p>Where a development proposal would not be anticipated to impact a biodiversity or geodiversity asset, a negligible impact would be expected for this objective.</p>
<p><b>4. Landscape:</b>                      Promote efficient use of land, while respecting the variety of landscape types in the area.</p>	<p>Impacts on landscape will be largely determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances. Detailed proposals for each development are uncertain at this stage of the assessment. Furthermore, this assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. However, there is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.</p> <p>Where a development proposal would not be anticipated to impact a local or designated landscape, a negligible impact would be expected for this objective.</p> <p><b>The Norfolk Coast and Suffolk Coast and Heaths AONBs:</b></p> <p>The Suffolk Coast and Heaths AONB is located, at its closest point, approximately 3km south east of the Greater Norwich boundary. Parts of the Norfolk Coast AONB are located approximately 8km to the north and east of Greater Norwich. It is not anticipated that the</p>

<sup>29</sup> 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.

<sup>30</sup> 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](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]

<sup>31</sup> The Landscape Partnership (2022) Habitats Regulations Assessment of published Proposed Submission Greater Norwich Local Plan – Gypsy and Traveller sites Addendum for Greater Norwich Development Partnership, June 2022.

SA Objective	Assessment Assumptions/Methodology
	<p>proposed development of Gypsy and Traveller Sites at any of the identified sites would impact either of these AONBs, and as such, they have not been considered further in this report.</p> <p><b>Discordant with LCA:</b></p> <p>Baseline data on Landscape Character Areas (LCAs) within the Plan area are derived from the Broadland Character Assessment Supplementary Planning Document (SPD)<sup>32</sup> and South Norfolk Landscape Character Assessment<sup>33</sup>. Key characteristics of each LCA have informed the appraisal of each development proposal against the landscape objective. Given that the detailed nature of the landscape in relation to each development proposal is unknown, the assessment of impact is based on the overall landscape character guidelines and key characteristics. Development proposals which are considered to be potentially discordant with the guidelines and characteristics provided in the published landscape character assessment would be expected to have a minor negative impact on the landscape objective.</p> <p><b>The Broads National Park:</b></p> <p>The Broads is an area covering approximately 303km<sup>2</sup> of low-lying wetland with National Park status. It is located to the east of Greater Norwich and follows the River Yare into Norwich City. None of the proposed Gypsy and Traveller sites are located within, or within close proximity to, the Broads and as such a negligible impact would be anticipated at all sites.</p> <p><b>Views:</b></p> <p>Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the Public Rights of Way (PRoW) network and/ or local residents would be expected to have minor negative impacts on the landscape objective.</p> <p>Potential views from residential properties are identified through reference to aerial mapping and the use of Google Maps<sup>34</sup>.</p> <p>It is anticipated that the GNLP will require developers to undertake Landscape and Visual Impact Assessments (LVIAs) to accompany any future proposals, where relevant. The LVIAs should seek to provide greater detail in relation to the landscape character of the development proposals and its surroundings, the views available towards the development, the character of those views and the sensitivity and value of the relevant landscape and visual receptors.</p> <p><b>Urbanisation of the Countryside:</b></p> <p>Development proposals which are considered to increase the risk of future development spreading further into the wider landscape would be expected to have a minor negative impact on the landscape objective.</p>
<p><b>5. Housing:</b> Ensure that everyone has</p>	<p>It is assumed that there will be no net loss of existing lawful Gypsy and Traveller pitches.</p>

<sup>32</sup> Broadland District Council (2013) Landscape Character Assessment Supplementary Planning Document (SPD). Available at: [https://www.broadland.gov.uk/downloads/download/167/landscape\\_character\\_assessment\\_supplementary\\_planning\\_document\\_spd](https://www.broadland.gov.uk/downloads/download/167/landscape_character_assessment_supplementary_planning_document_spd) [Date accessed: 22/06/22]

<sup>33</sup> Land Use Consultants (2001) South Norfolk Landscape Assessment. Available at: <https://www.south-norfolk.gov.uk/residents/planning/planning-policy/landscape-character-assessments> [Date accessed: 22/06/22]

<sup>34</sup> Google Maps (2022). Available at: <https://www.google.co.uk/maps> [Date accessed: 22/06/22]

SA Objective	Assessment Assumptions/Methodology
good quality housing of the right size and tenure to meet their needs.	Sites put forward for the development of additional pitches for Gypsies and Travellers are expected to make a minor positive contribution to fulfilling the identified accommodation needs.
<b>6. Population and Communities:</b> Maintain and improve the quality of life of residents.	<p><b>Local Services:</b></p> <p>In accordance with Barton et al.'s sustainable distances<sup>35</sup>, proposed development which is located within 600m of a local service, such as a post office or a convenience store, would be expected to provide site end users with access to essential services. Development proposals located within this target distance would be expected to have a minor positive impact on this objective. Development proposals located outside this target distance would be expected to have a minor negative impact on this objective.</p> <p><b>Local Landscape Designations:</b></p> <p>The local landscape designations dataset has been provided by the GNLP. This includes areas of multi-functional green infrastructure and community buildings such as playing fields, allotments and other communal spaces which would be expected to help improve the quality of life for local residents.</p> <p>Development proposals which would situate site end users within 600m of a local landscape designation would be likely to have a minor positive impact on this objective.</p> <p><b>Overall:</b></p> <p>Development proposals which would locate site end users within 600m of both an open greenspace and a local landscape designation would be expected to have a major positive impact for this objective.</p>
<b>7. Deprivation:</b> To reduce deprivation.	<p>The purpose of this objective is to help redress deprivation issues across the Plan area. None of the site proposals assessed in this report will be expected to redress these issues. At this stage, it is assumed that development proposals at all of the reasonable alternative sites would have a negligible impact for this objective.</p>
<b>8. Health:</b> To promote access to health facilities and promote healthy lifestyles.	<p><b>Green Network:</b></p> <p>Development proposals have been assessed in terms of their access to the local PRoW networks and public greenspace. In line with Barton et al.<sup>36</sup>, a sustainable distance of 600m has been used for the assessments. Development proposals that are located within 600m of a PRoW/public greenspace would be expected to have a minor positive impact on residents' access to a diverse range of natural habitats. Development proposals located over 600m from a PRoW/public greenspace could potentially have a minor negative impact on residents' access to natural habitats, and therefore have an adverse impact on the physical and mental health of local residents.</p> <p><b>Air Quality:</b></p> <p>It is assumed that development proposals located in close proximity to main roads would expose site end users to transport associated noise and air pollution. In line with the DMRB guidance, it is assumed that receptors would be most vulnerable to these impacts</p>

<sup>35</sup> Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability.

<sup>36</sup> Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability.



SA Objective	Assessment Assumptions/Methodology
	<p>located within 200m of a main road<sup>37</sup>. Negative impacts on the long-term health of residents would be anticipated where residents would be exposed to air pollution.</p> <p>Development proposals located within 200m of a main road would be expected to have a minor negative impact on local residents' exposure to air pollution. Development proposals located over 200m from a main road would be expected to have a minor positive impact on local residents' exposure to air pollution.</p> <p>Air Quality Management Areas (AQMAs) are considered to be an area where the national air quality objective will not be met. No proposed Gypsy and Traveller sites are located within, or within 200m of, an AQMA.</p> <p><b>Health Facilities:</b></p> <p>In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the GNDP should seek to ensure that residents have access to NHS hospitals, GP surgeries, leisure centres and a diverse range of accessible natural habitats and the surrounding PRoW network. Sustainable distances to each of these necessary services are derived from Barton et al.<sup>38</sup>.</p> <p>Adverse impacts are anticipated where the proposed development would not be expected to facilitate active and healthy lifestyles for current or future residents.</p> <p>For the purposes of this assessment, accessibility to a hospital has been taken as proximity to an NHS hospital with an A&amp;E service. Distances of development proposals to other NHS facilities (e.g. community hospitals and treatment centres) or private hospitals has not been taken into consideration in this assessment. The two NHS hospitals with an A&amp;E department in close proximity Greater Norwich are Norfolk and Norwich University Hospital and James Paget University Hospital.</p> <p>Development proposals located within 5km of one of these hospitals would be expected to have a minor positive impact on the access of site end users to emergency health services. Development proposals located over 5km from one of these hospitals would be likely to have a minor negative impact on the access of site end users to emergency health care.</p> <p>There are numerous GP surgeries located across the Plan area. Development proposals located within 800m of a GP surgery would be expected to have a minor positive impact on the access of site end users to this essential health service. Development proposals located over 800m from a GP surgery would be likely to have a minor negative impact on the access of site end users to essential health care.</p> <p>Access to leisure centres can provide local residents with opportunities to facilitate healthy lifestyles through exercise. Development proposals located within 1.5km of a leisure centre would be expected to have a minor positive impact on the access of site end users to these facilities. Development proposal located over 1.5km from a leisure centre would be likely to have a minor negative impact on the access of site end users to these facilities.</p> <p><b>Overall:</b></p> <p>Development proposals which would locate site end users in close proximity to one of the listed NHS hospitals, a GP surgery and a leisure centre would be expected to have a major positive impact for this objective.</p>

<sup>37</sup> Design Manual for Roads and Bridges (2019) Sustainability & Environment Appraisal: LA 105 Air quality. Available at: <https://www.standardsforhighways.co.uk/dmrb/search/10191621-07df-44a3-892e-c1d5c7a28d90> [Date accessed: 22/04/22]

<sup>38</sup> Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

SA Objective	Assessment Assumptions/Methodology
	<p>Development proposals which would locate site end users away from the listed NHS hospitals, a GP surgery and a leisure centre would be expected to have a major negative impact for this objective.</p>
<p><b>9. Crime:</b> To reduce crime and the fear of crime.</p>	<p>The purpose of this objective is to help reduce crime rates in the local area. It is not possible to assess the impacts of residential site proposals on local crime prevention or crime rates. At this stage, it is assumed that development proposals at all reasonable alternative sites would have a negligible impact for this objective.</p>
<p><b>10. Education:</b> To improve skills and education.</p>	<p>It is assumed that new residents in the Plan area require access to primary and secondary education services to help facilitate good levels of education, skills and qualifications of residents.</p> <p>In line with Barton et al.'s sustainable distances<sup>39</sup>, for the purpose of this assessment, 800m is assumed to be the target distance for travelling to a primary school and 1.5km to secondary schools. All schools identified are publicly accessible state schools.</p> <p>It is recognised that not all schools within Greater Norwich are accessible to all pupils. For instance, independent and academically selective schools may not be accessible to all. Local primary schools may only be Infant or Junior schools and therefore not provide education for all children of primary school age. Some secondary schools may only be for girls or boys and therefore would not provide education for all. This has been considered within the assessment.</p> <p>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.</p> <p>Development proposals which would locate site end users within the target distances of a primary school or secondary school would be expected to have a minor positive impact for this objective.</p> <p>Development proposals which would locate site end users outside of the target distances of a primary or secondary school would be expected to have a minor negative impact for this objective.</p> <p>Development proposals which would locate new residents within the target distance to both a primary and secondary school would be expected to have a major positive impact on the education objective.</p> <p>Development proposals which would locate new residents outside of the target distance to both a primary and secondary school would be likely to have a major negative impact on the education objective.</p>
<p><b>11. Economy:</b> Encourage economic development covering a range of sectors and skill levels to improve employment</p>	<p><b>Employment Opportunities:</b></p> <p>It is assumed that, in line with Barton et al.'s sustainable distances<sup>40</sup>, new residents should be situated within 5km of key employment areas to ensure they have access to a range of employment opportunities capable of meeting their needs. Key employment areas are defined as locations which would provide a range of employment opportunities from a variety of employment sectors, including retail parks, industrial estates and major local employers. No further study has been undertaken to identify all employment areas.</p> <p>Development proposals which would locate site end users within the target distances of a key employment area would be expected to have a minor positive impact for this</p>

<sup>39</sup> Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010.

<sup>40</sup> Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

SA Objective	Assessment Assumptions/Methodology
<p>opportunities for residents and maintain and enhance town centres.</p>	<p>objective. Development proposals which would locate site end users outside the target distances to a key employment area would be expected to have a minor negative impact for this objective.</p> <p><b>Employment Floorspace:</b></p> <p>An assessment of current land use at all sites has been made through reference to aerial mapping and the use of Google Maps<sup>41</sup>.</p> <p>Development proposals which could result in a net decrease in employment floorspace would be expected to have a negative impact on the local economy.</p>
<p><b>12. Transport and Access to Services:</b>                      Reduce the need to travel and promote the use of sustainable transport modes.</p>	<p><b>Public Transport:</b></p> <p>In line with Barton et al.'s sustainable distances, site end users should be situated within 2km of a railway station and 400m of a bus stop offering a frequent service. Bus service frequency and destination information was obtained from Google Maps<sup>42 43</sup>.</p> <p>In order for a positive impact to be anticipated with regard to access to public transport, consideration has been given to the proportion of a development proposal within the target distance of these key transport services. To be sustainable, the bus stop should provide users with hourly services.</p> <p>Development proposals located within the target distance to a railway station or bus stop would be expected to have a minor positive impact on local transport and accessibility. Development proposals located outside of the target distance to a railway station or a bus stop would be expected to have a minor negative impact on transport and accessibility.</p> <p><b>Pedestrian Access:</b></p> <p>Development proposals have been assessed in terms of their access to the surrounding footpath network. In order for a positive impact to be anticipated with regard to pedestrian access, consideration has been given to safe access to and from the development e.g. footpath. Safe access is determined to be that which is suitable for wheelchair users and pushchairs.</p> <p>Development proposals which would be expected to provide site end users with adequate access to the surrounding footpath network would be expected to have a minor positive impact on pedestrian access. Development proposals which would not be anticipated to provide adequate access would be expected to result in a minor negative impact on pedestrian access.</p> <p><b>Road Access:</b></p> <p>Development proposals have been assessed in terms of their access to the surrounding road network. Development proposals which would be likely to provide site end users with adequate access to the surrounding road network would be expected to have a minor positive impact on road access. Development proposals which would not be anticipated to provide adequate access would be expected to have a minor negative impact on road access.</p> <p><b>Overall:</b></p> <p>Development proposals which would locate site end users in close proximity to all the above receptors would be expected to have a major positive impact for this objective.</p>

<sup>41</sup> Google Maps (2022). Available at: <https://www.google.co.uk/maps> [Date accessed: 14/04/22]

<sup>42</sup> Ibid

<sup>43</sup> Live departure boards available from Google Maps have been used to assess the frequency of services at bus stops within the Plan area. These are obtained from local bus timetables.

SA Objective	Assessment Assumptions/Methodology
	<p>Development proposals which would locate site end users away from all the above receptors would be expected to have a major negative impact for this objective.</p>
<p><b>13. Historic Environment:</b>                      Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment.</p>	<p>Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. There is a risk of adverse effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a site is in close proximity to heritage assets.</p> <p>Adverse impacts are recorded for options which have the potential to have an adverse impact on sensitive heritage designations, including Listed Buildings, Scheduled Monuments (SM), Registered Parks and Gardens (RPG), and Conservation Areas.</p> <p>It is assumed that where a designated heritage asset coincides with a site proposal, the heritage asset will not be lost as a result of development (unless otherwise specified by the GNDP). Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset.</p> <p><b>Setting:</b></p> <p>Development which could potentially be discordant with the local character or setting, for example, due to design, layout, scale or type, would be expected to adversely impact the setting of nearby heritage assets that are important components of the local area. Views of, or from, the heritage asset are considered as part of the assessment of potential impacts on the setting of the asset.</p> <p><b>Designated Features:</b></p> <p>No proposed Gypsy and Traveller sites coincide with a designated heritage asset.</p> <p>Where the development proposal lies adjacent to, or in close proximity to, a Listed Building, Conservation Area, SM, or RPG, an adverse impact on the setting of the asset would be likely, to some extent, and a minor negative impact may therefore be expected.</p> <p>Where development proposals are not located in close proximity to any heritage asset, or the nature of development is determined not to affect the setting or character of the nearby heritage asset, a negligible impact would be expected for this objective.</p> <p>It is anticipated that the GNDP will require a Heritage Statement to be prepared to accompany future planning applications, where appropriate. The Heritage Statement should describe the significance of any heritage assets affected by the proposals, including any contribution made by their settings.</p> <p>It is assumed that desk-based assessments will be required on a site-by-site basis for planning proposals which could potentially impact archaeological features. At this stage of the Plan preparation process there is no data available to indicate areas of archaeological potential within Greater Norwich, and as such no assessment has been carried out with regard to archaeology at present.</p>
<p><b>14. Natural Resources, Waste and Contaminated Land:</b> Minimise waste generation,</p>	<p><b>Previously Developed Land:</b></p> <p>In accordance with the core planning principles of the NPPF<sup>44</sup>, development on previously developed land will be recognised as an efficient use of land. Development of previously undeveloped land and greenfield sites is not considered to be an efficient use of land.</p>

<sup>44</sup> Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 22/04/22]

SA Objective	Assessment Assumptions/Methodology
<p>promote recycling and avoid the sterilisation of mineral resources. Remediate contaminated land and minimise the use of the best and most versatile agricultural land.</p>	<p>Development of an existing brownfield site would be expected to contribute positively to safeguarding greenfield land in Greater Norwich and have a minor positive impact on this objective.</p> <p>Development proposals situated on previously undeveloped land would be expected to pose a threat to soil within the site perimeter due to excavation, soil compaction, erosion and an increased risk of soil pollution and contamination during construction.</p> <p>In addition, development proposals which would result in the loss of greenfield land would be expected to contribute towards a cumulative loss of ecological habitat. This would be expected to lead to greater levels of habitat fragmentation and isolation for the local ecological network restricting the ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land has therefore been considered to have an adverse effect under this objective.</p> <p>For the purpose of this report, a 20ha threshold has been used based on available guidance<sup>45</sup>. Development proposals which would result in the loss of less than 20ha of greenfield land would be expected to have a minor negative impact on this objective. Development proposals which would result in the loss of 20ha or more of greenfield land would be expected to have a major negative impact on this objective.</p> <p><b>Agricultural Land Classification:</b></p> <p>The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and 3a, are referred to as the Best and Most Versatile (BMV) land<sup>46</sup>. In the absence of site-specific surveys to identify Grades 3a and 3b, and in line with the precautionary principle, ALC Grade 3 is considered as BMV land.</p> <p>Adverse impacts are expected for options which would result in a net loss of agriculturally valuable soils. Development proposals which are situated on Grade 1, 2 or 3 ALC land, and would therefore risk the loss of some of the Plan areas BMV land, would be expected to have a minor negative impact for this objective.</p> <p>Development proposals which are situated on Grade 4 and 5 ALC land, or land classified as 'urban' or 'non-agricultural' and would therefore help prevent the loss of the Plan areas BMV land, would be expected to have a minor positive impact for this objective.</p> <p><b>Household Waste:</b></p> <p>At this stage, the nature and design of pitches or plots at each site is unknown. Therefore, increases in waste and consumption of resources as a result of the construction and occupation of dwellings is unknown.</p> <p>Due to the extent and nature of the development (pitches for Gypsies &amp; Travellers) it is assumed that development proposals would have a negligible impact on Greater Norwich's waste and resources.</p>
<p><b>15. Water:</b> Maintain and enhance water quality and ensure</p>	<p><b>Groundwater:</b></p> <p>The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones</p>

<sup>45</sup> Natural England (2009) Agricultural Land Classification: protecting the best and most versatile agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/35012> [Date accessed: 22/04/22]

<sup>46</sup> Natural England (1988) Agricultural Land Classification of England and Wales: Revised criteria for grading the quality of agricultural land (ALC011). Available at: <http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736> [Date accessed: 14/04/22]

SA Objective	Assessment Assumptions/Methodology
<p>the most efficient use of water.</p>	<p>(SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. As such, any development proposal that is located within a groundwater SPZ could potentially have an adverse impact on groundwater quality.</p> <p><b>Watercourses:</b></p> <p>Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact on the quality of the water<sup>47</sup>. An approximate 10m buffer zone from a watercourse should be used in which no works, clearance, storage or run-off should be permitted<sup>48</sup>. In this assessment, a 200m buffer zone was deemed appropriate.</p> <p>Development proposals located within 200m of a watercourse would be expected to have a minor negative impact on local water quality.</p> <p><b>Water Consumption:</b></p> <p>It is assumed that development proposals will be in accordance with the national mandatory water efficiency standard of 125 litres per person per day, as set out in the Building Regulations 2010<sup>49</sup>.</p> <p>It is assumed that all Gypsy and Traveller site proposals in the GNLP will be subject to appropriate approvals and licensing for sustainable water supply from the Environment Agency.</p>

<sup>47</sup> World Health Organisation (1996) Water Quality Monitoring - A Practical Guide to the Design and Implementation of Freshwater Quality Studies and Monitoring Programmes: Chapter 2 – Water Quality. Available at: <https://apps.who.int/iris/handle/10665/41851> [Date accessed: 14/04/22]

<sup>48</sup> Department of Agriculture, Environment and Rural Affairs (no date) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date accessed: 22/04/22]

<sup>49</sup> The Building Regulations 2010. Available at: <http://www.legislation.gov.uk/uksi/2010/2214/contents/made> [Date accessed: 22/04/22]

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## 3 Pre-mitigation site assessments

### 3.1 Overview

- 3.1.1 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.
- 3.1.2 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.
- 3.1.3 **Table 3.1** presents a summary of the pre-mitigation impacts identified for each of the 11 reasonable alternative Gypsy and Traveller sites. The pre-mitigation assessments of the reasonable alternative sites proposed for Gypsy and Traveller pitches are presented in full in **sections 3.2 to 3.12** and should be read in conjunction with **Table 3.1**.
- 3.1.4 The SA assessments of the reasonable alternative sites identified positive, negligible, minor negative and major negative impacts for the SA objectives (pre-mitigation). The SA found that the proposed development at the majority of the sites would be expected to have minor negative or negligible impacts.



**Table 3.1: Pre-mitigation impacts of each site identified in the SA Report**

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	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5004	0	+	-	0	+	-	0	--	0	--	+	-	0	-	-
GNLP5005	-	+	--	0	+	-	0	-	0	--	-	-	0	-	-
GNLP5009	0	+	-	-	+	-	0	-	0	-	+	-	-	-	-
GNLP5013	0	+	-	0	+	-	0	-	0	--	-	-	0	+	-
GNLP5014	-	+	+/-	-	+	-	0	--	0	--	+	-	0	-	0
GNLP5019	0	-	-	0	+	-	0	--	0	--	+	--	0	-	0
GNLP5020	0	-	-	0	+	-	0	--	0	--	-	-	0	-	-
GNLP5021	-	+	-	0	+	-	0	--	0	--	+	-	0	-	-
GNLP5022	0	-	-	0	+	-	0	--	0	--	+	-	0	-	-
GNLP5023	-	+	-	-	+	-	0	-	0	--	+	-	0	-	-
GNLP5024	0	-	-	0	+	-	0	--	0	--	-	-	0	-	-

### 3.2 Site GNL P5004 - Land off Buxton Road, Eastgate

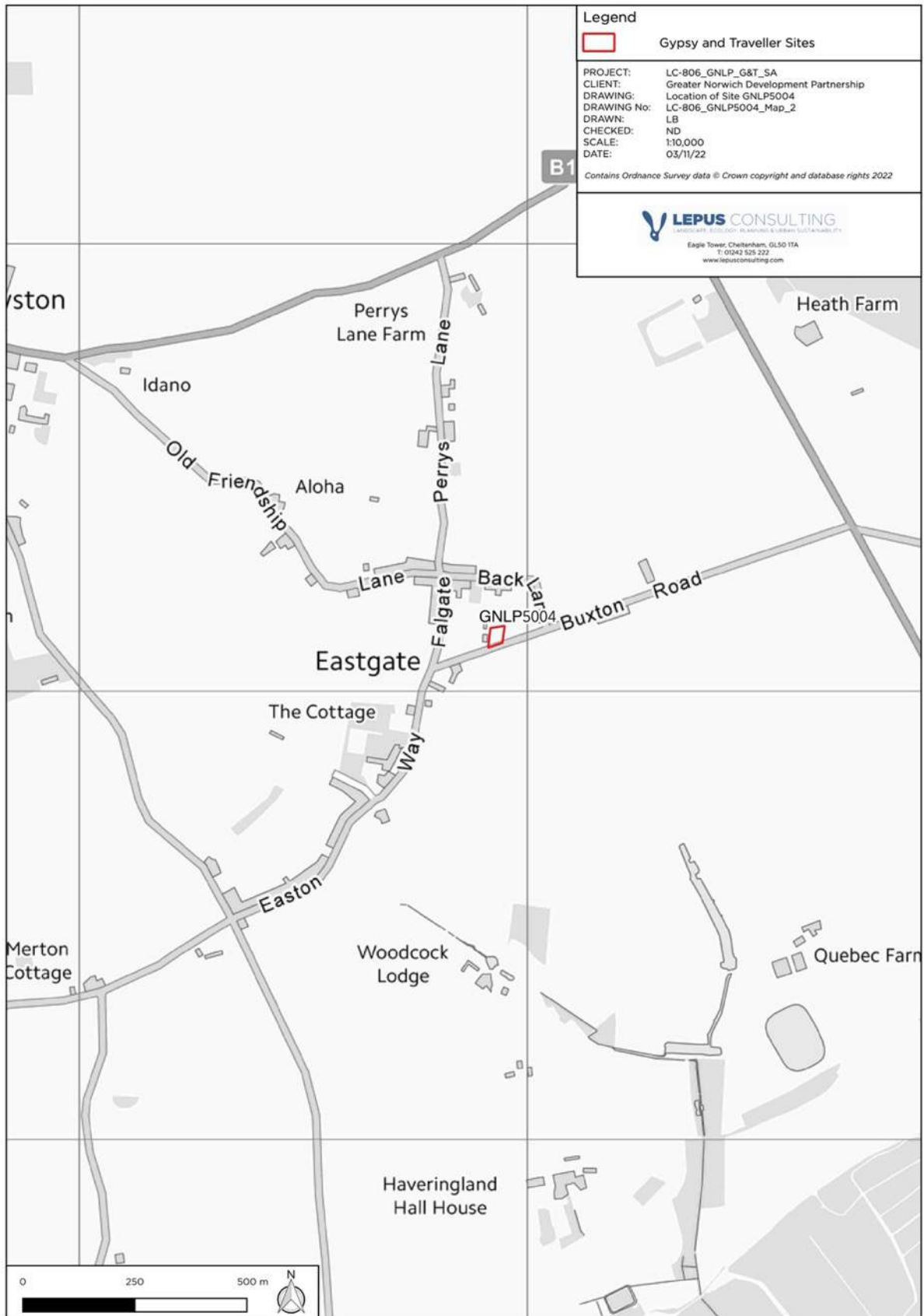


Figure 3.1: Location of proposed Gypsy and Traveller Site GNL P5004

Site GNLP5004: Site information and overall scores per SA Objective (pre-mitigation)														
Site Name							Area (ha)				Proposed No. of Pitches			
Land off Buxton Road, Eastgate							0.12				4			
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	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
0	+	-	0	+	-	0	--	0	--	+	-	0	-	-

**SA1: Air Quality and Noise**

3.2.1 **Air and Noise Pollution:** Site GNLP5004 is proposed for small-scale development (four Gypsy and Traveller pitches) and is situated away from major sources of air and noise pollution. A negligible impact on local air quality and noise would be expected.

**SA2: Climate Change Mitigation and Adaptation**

3.2.2 **Fluvial Flooding:** Site GNLP5004 is located wholly within Flood Zone 1. 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.

**SA3: Biodiversity, Geodiversity and Green Infrastructure**

3.2.3 **Habitats Sites:** Site GNLP5004 is located approximately 2.3km from ‘Norfolk Valley Fens’ SAC and 12.8km from ‘Broadland’ SPA/Ramsar and ‘The Broads’ SAC . It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

3.2.4 **SSSI IRZ:** Site GNLP5004 is located within a Nutrient Impact Area, 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”. A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

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## SA4: Landscape

- 3.2.5 **Landscape Character:** Site GNLP5004 is located within the LCA 'Cawston Tributary Farmland'. Some key characteristics of this LCA include the mosaic of arable fields, woodland and parkland, and landscape setting of villages and notable buildings. Due to the expected small-scale development (four Gypsy and Traveller pitches) situated in a small enclosed field, it is not anticipated that development proposals would be discordant with this LCA. Therefore, a negligible impact on the landscape character would be expected.

## SA5: Housing

- 3.2.6 **Provision of Pitches:** Site GNLP5004 is proposed for the development of four Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

## SA6: Population and Communities

- 3.2.7 **Local Services:** The nearest local shop to Site GNLP5004 is Cawston Post Office and Store, located approximately 1.4km from the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

## SA7: Deprivation

- 3.2.8 See **Table 2.4**, 'SA7: Deprivation'.

## SA8: Health

- 3.2.9 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5004 is Norfolk and Norwich University Hospital, located approximately 16.3km from the site, outside the sustainable target distance. The proposed development at Site GNLP5004 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.
- 3.2.10 **GP Surgery:** Site GNLP5004 is located approximately 1.2km from the closest GP surgery, 'Dr Harrison K & Partners', outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.
- 3.2.11 **Leisure Facilities:** The closest leisure centre to Site GNLP5004 is 'Victory Swim and Fitness Leisure Centre', located approximately 14.8km from the site. Site GNLP5004 is located outside of 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.
- 3.2.12 **Main Road:** Site GNLP5004 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.

3.2.13 **Green Network:** Site GNLP5004 is located within 600m from the PRow network. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

3.2.14 As Site GNLP5004 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.

### **SA9: Crime**

3.2.15 See **Table 2.4**, 'SA9: Crime'.

### **SA10: Education**

3.2.16 **Primary/Secondary School:** Site GNLP5004 is located approximately 1.1km from the closest primary school, Cawston CE Primary School. The site is also located approximately 5.3km from the closest secondary school, Reepham High School and College. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

### **SA11: Economy**

3.2.17 **Primary Employment Location:** Site GNLP5004 is located approximately 5km from the market town of Reepham, which would be expected to provide a range of employment opportunities for site end users and is within the sustainable target distance. Therefore, a minor positive impact on the local economy would be expected.

### **SA12: Transport and Access to Services**

3.2.18 **Bus Stop:** Site GNLP5004 is located within the target distance to bus service '42', Reepham to Norwich route; however, this only provides two services per day. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to bus services.

3.2.19 **Railway Station:** Site GNLP5004 is located outside the target distance to a railway station, with the nearest being North Walsham Railway Station situated over 14km to the north east. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.

3.2.20 **Pedestrian Access:** Site GNLP5004 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.

3.2.21 **Road Network:** Site GNLP5004 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.

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### SA13: Historic Environment

- 3.2.22 **Heritage Assets:** The development proposed at Site GNLP5004 would be unlikely to significantly impact any surrounding heritage assets, and therefore, would be expected to have a negligible impact on the local historic environment.

### SA14: Natural Resources, Waste and Contaminated Land

- 3.2.23 **Previously Developed Land:** Site GNLP5004 is located upon 0.12ha of previously undeveloped land. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

- 3.2.24 **ALC:** Site GNLP5004 is situated upon ALC Grade 2 land which represents 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.

### SA15: Water

- 3.2.25 **SPZ:** Site GNLP5004 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.



### 3.3 Site GNL P5005 – Wymondham Recycling Centre, Strayground Lane

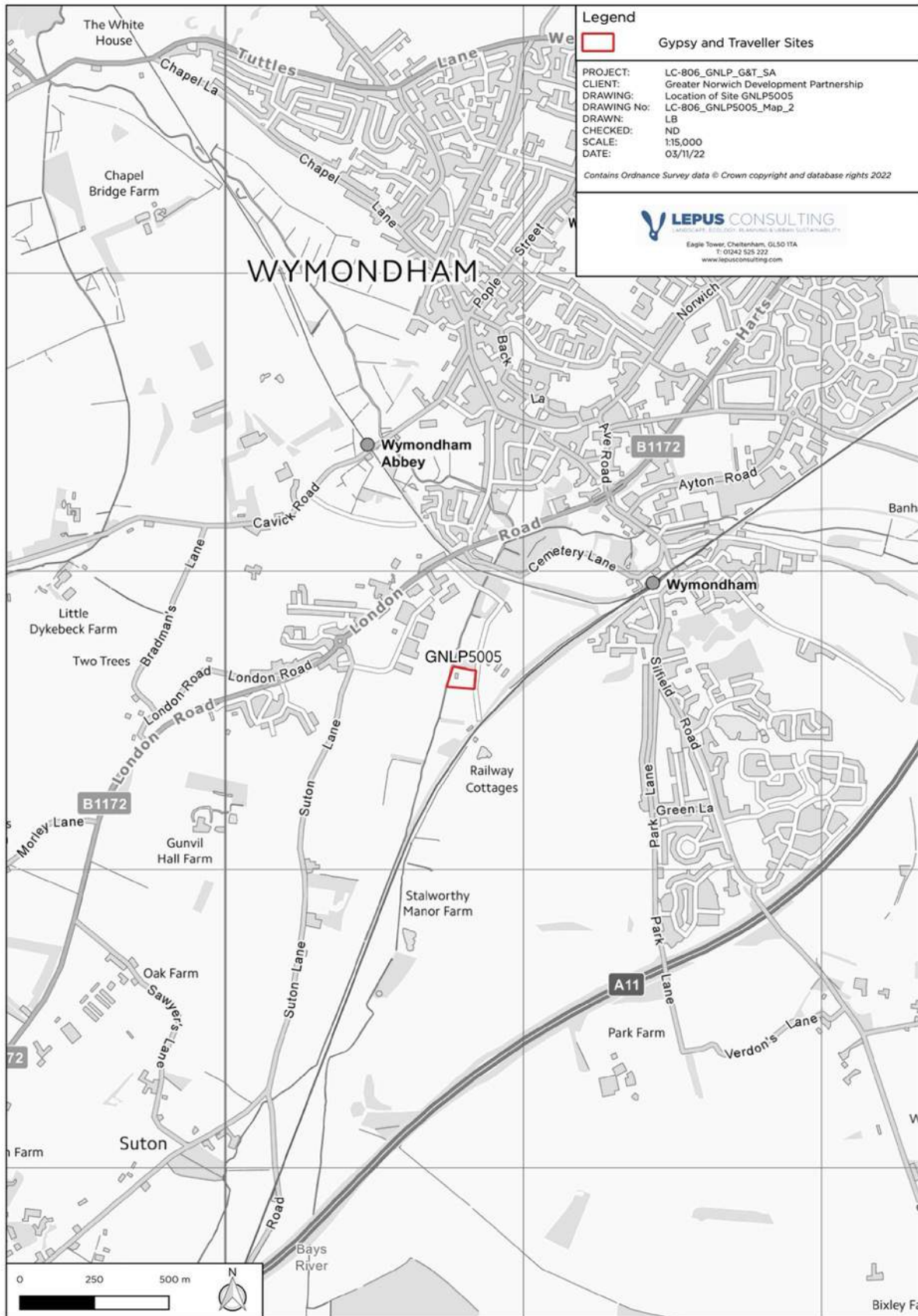


Figure 3.2: Location of proposed Gypsy and Traveller Site GNL P5005

**Site GNLG5005: Site information and overall scores per SA Objective (pre-mitigation)**

Site Name		Area (ha)		Proposed No. of Pitches										
Wymondham Recycling Centre, Strayground Lane		0.07		2										
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	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
-	+	--	0	+	-	0	-	0	--	-	-	0	-	-

**SA1: Air Quality and Noise**

3.3.1 **Railway Line:** Site GNLG5005 is located within 200m of a railway line, therefore the proposed development at this site could potentially expose site end users to higher levels of noise pollution and vibrations associated with this railway. A minor negative impact would be expected.

**SA2: Climate Change Mitigation and Adaptation**

3.3.2 **Fluvial Flooding:** Site GNLG5005 is located wholly within Flood Zone 1. 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.

**SA3: Biodiversity, Geodiversity and Green Infrastructure**

3.3.3 **Habitats Sites:** Site GNLG5005 is located approximately 7.8km from ‘Norfolk Valley Fens’ SAC, 12.5km from ‘River Wensum’ SAC and 20km from ‘Broadland’ SPA/Ramsar and ‘The Broads’ SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.



- 3.3.4 **SSSI IRZ:** Site GNLP5005 is located within a Nutrient Impact Area, 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*”. A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.
- 3.3.5 **County Wildlife Site:** The north of Site GNLP5005 coincides with a section of ‘Bays River Meadows North’ CWS. It is noted that part of this section of the CWS within the boundary of Site GNLP5005 comprises hardstanding associated with Wymondham Recycling Centre; however, a section along the northern site boundary remains undeveloped. The proposed development at this site could potentially result in direct adverse impacts on this CWS, and therefore a major negative impact on biodiversity could be expected.
- 3.3.6 **Priority Habitats:** The north of Site GNLP5005 coincides with approximately 0.01ha of lowland fens priority habitat. Therefore, the proposed development at this site could potentially result in the partial loss or degradation of this habitat, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.

#### **SA4: Landscape**

- 3.3.7 **Landscape Character:** Site GNLP5005 is located within the LCA ‘Tiffey Tributary Farmland’. Some key characteristics of this LCA include large scale arable farmland, water bodies, sparse settlements and long views. Due to the expected small-scale development (two Gypsy and Traveller pitches) situated on a partially developed site, it is not anticipated that development proposals would be discordant with this LCA. Therefore, a negligible impact on the landscape character would be expected.

#### **SA5: Housing**

- 3.3.8 **Provision of Pitches:** Site GNLP5005 is proposed for the development of two Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

#### **SA6: Population and Communities**

- 3.3.9 **Local Services:** The nearest local shop to Site GNLP5005 is Co-op, located just over 600m from the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.
- 3.3.10 **Local Landscape Designations:** Site GNLP5005 is located within 600m from natural and semi-natural greenspace at Tolls Meadow. The proposed development at this site would therefore be likely to provide site end users with good access to this asset, and as such, result in a minor positive impact on opportunities for integration with the local community.

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### SA7: Deprivation

3.3.11 See **Table 2.4**, 'SA7: Deprivation'.

### SA8: Health

3.3.12 **NHS Hospital:** The closest hospital with an A&E department to Site GNLG5005 is Norfolk and Norwich University Hospital, located approximately 9.7km from the site, outside the sustainable target distance. The proposed development at Site GNLG5005 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.

3.3.13 **GP Surgery:** Site GNLG5005 is located approximately 840m from the closest GP surgery, 'Dr Watts', outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.

3.3.14 **Leisure Facilities:** The closest leisure centre to Site GNLG5005 is 'Wymondham Leisure Centre', located approximately 1.3km from the site. Site GNLG5005 is located within the target distance to this leisure facility, and therefore a minor positive impact on the health and wellbeing of site end users would be expected.

3.3.15 **Main Road:** Site GNLG5005 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.

3.3.16 **Green Network:** Site GNLG5005 is located within 600m from the PRow network and open greenspaces, including play space and a cemetery. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

### SA9: Crime

3.3.17 See **Table 2.4**, 'SA9: Crime'.

### SA10: Education

3.3.18 **Primary/Secondary School:** Site GNLG5005 is located approximately 960m from the closest primary school, Browick Road Primary School. The majority of Site GNLG5005 is located outside of the sustainable distance to the closest secondary school, Wymondham High Academy. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

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### SA11: Economy

- 3.3.19 **Primary Employment Location:** Site GNLP5005 is located approximately 300m from Wymondham Business Park with many potential employment opportunities for site end users, including businesses 'Express Equine', 'Supreme Bathroom and Kitchen Centre' and 'Abbeygate Accident and Repair', in addition to those expected in Wymondham Town Centre. Therefore, a minor positive impact on the local economy would be expected.
- 3.3.20 **Employment Floorspace:** Site GNLP5005 coincides with 'Wymondham Recycling Centre'. The proposed development of this site could potentially result in the loss of any employment opportunities currently associated with this site. Therefore, a minor negative impact could be expected following development at this site.

### SA12: Transport and Access to Services

- 3.3.21 **Bus Stop:** Site GNLP5005 is located outside the target distance to a bus stop. The closest bus stop is located approximately 410m from the site on London Road and provides regular services '13', '13A', '13B' and '805', including routes to Norwich and the surrounding area. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.
- 3.3.22 **Railway Station:** Site GNLP5005 is located within the target distance to Wymondham Railway Station. The proposed development at this site would be likely to have a minor positive impact on the access of site end users to rail services.
- 3.3.23 **Pedestrian Access:** Site GNLP5005 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.
- 3.3.24 **Road Network:** Site GNLP5005 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.

### SA13: Historic Environment

- 3.3.25 **Grade II Listed Building:** Site GNLP5005 is located approximately 350m from the Grade II Listed Building 'Ivy Green Villa'. Due to this distance and intervening development (Wymondham Business Park), and the expected small number of pitches at this site, it is not anticipated that it would affect the setting of this Listed Building. Therefore, the proposed development at this site would be expected to result in a negligible impact on the historic environment.

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### SA14: Natural Resources, Waste and Contaminated Land

- 3.3.26 **Previously Developed Land:** Site GNL P5005 is located upon 0.07ha of primarily previously developed land; however, the site also contains an undeveloped area along the Bays River. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- 3.3.27 **ALC:** Site GNL P5005 is situated upon ALC Grade 2 land which represents 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.

### SA15: Water

- 3.3.28 **SPZ:** Site GNL P5005 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.
- 3.3.29 **Watercourse:** Site GNL P5005 is located approximately 70m from the Bays River. 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.

### 3.4 Site GNLP5009 - Hockering Lane

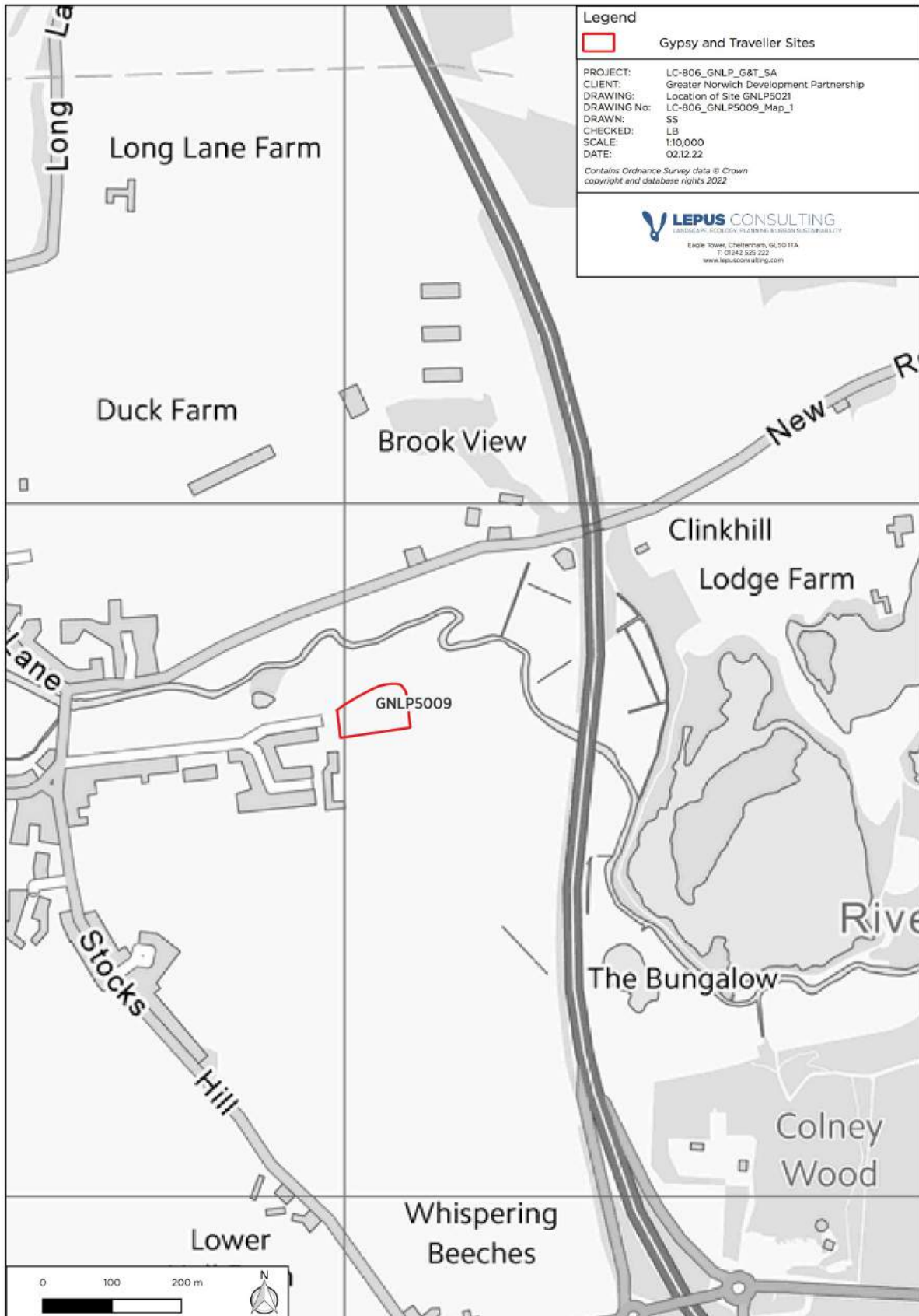


Figure 3.3: Location of proposed Gypsy and Traveller Site GNLP5009

**Site GNL P5009: Site information and overall scores per SA Objective (pre-mitigation)**

Site Name		Area (ha)		Proposed No. of Pitches										
Hockering Lane		0.59		6										
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	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
0	+	-	-	+	-	0	-	0	-	+	-	-	-	-

**SA1: Air Quality and Noise**

3.4.1 **Air and Noise Pollution:** Site GNL P5009 is proposed for small-scale development (six Gypsy and Traveller pitches), and is situated away from major sources of air and noise pollution. A negligible impact on local air quality and noise would be expected.

**SA2: Climate Change Mitigation and Adaptation**

3.4.2 **Fluvial Flooding:** Site GNL P5009 is located wholly within Flood Zone 1. 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.

**SA3: Biodiversity, Geodiversity and Green Infrastructure**

3.4.3 **Habitats Sites:** Site GNL P5009 is located approximately 3km from ‘River Wensum’ SAC and 12.5km from ‘Broadland’ SPA/Ramsar and ‘The Broads’ SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites.

3.4.4 **SSSI IRZ:** Site GNL P5009 is located within a Nutrient Impact Area, 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”. A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

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## SA4: Landscape

- 3.4.5 **Landscape Character:** Site GNLP5009 is located within the LCA 'Yare/Tiffey Rural River Valley'. Some key characteristics of this LCA include vegetated valley floor, meandering rivers, pastoral land use, small woodland blocks, and small attractive villages. Site GNLP5009 comprises an area of arable farmland and hedgerow/trees outside of the existing settlement of Bawburgh, in close proximity to the River Yare. The proposed development at this site could potentially result in some small-scale loss or degradation of vegetation associated with the river corridor, and therefore, have a minor negative impact on the local landscape character.
- 3.4.6 **Views for Local Residents:** Site GNLP5009 is located within the outskirts of Bawburgh and the proposed development at this site has the potential to alter views experienced by local residents of surrounding dwellings to some extent, such as those on Hockering Lane. Therefore, a minor negative impact on the local landscape would be expected.
- 3.4.7 **Urbanisation of the Countryside:** Site GNLP5009 comprises previously undeveloped land and is located outside of Bawburgh. 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.

## SA5: Housing

- 3.4.8 **Provision of Pitches:** Site GNLP5009 is proposed for the development of six Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

## SA6: Population and Communities

- 3.4.9 **Local Services:** The nearest local shop to Site GNLP5009 is Co-op, located approximately 1.7km from the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.
- 3.4.10 **Local Landscape Designations:** Site GNLP5009 is located within 600m from Bawburgh Allotments, Village Green and amenity open space at Harts Land and New Road. The proposed development at this site would therefore be likely to provide site end users with good access to these assets, and as such, result in a minor positive impact on opportunities for integration with the local community.

## SA7: Deprivation

- 3.4.11 See **Table 2.4**, 'SA7: Deprivation'.



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## SA8: Health

- 3.4.12 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5009 is Norfolk and Norwich University Hospital, located approximately 2.6km from the site, within the sustainable target distance. The proposed development at Site GNLP5009 would be expected to provide site end users with good access to this healthcare facility and therefore a minor positive impact would be expected.
- 3.4.13 **GP Surgery:** Site GNLP5009 is located approximately 1.6km from the closest GP surgery, 'Bowthorpe Health Centre', outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.
- 3.4.14 **Leisure Facilities:** The closest leisure centre to Site GNLP5009 is 'Riverside Leisure Centre', located approximately 7.9km from the site. Site GNLP5009 is located outside of 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.
- 3.4.15 **Main Road:** Site GNLP5009 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.
- 3.4.16 **Green Network:** Site GNLP5009 is located within 600m from an open greenspace (play space). Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

## SA9: Crime

- 3.4.17 See **Table 2.4**, 'SA9: Crime'.

## SA10: Education

- 3.4.18 **Primary School:** Site GNLP5009 is located approximately 200m from The Bawburgh School, within the sustainable target distance. Therefore, a minor positive impact on the access of site end users to primary education would be expected.
- 3.4.19 **Secondary School:** Site GNLP5009 is located approximately 2.1km from the closest secondary school, Ormiston Victory Academy. Therefore, as the site is located outside of the sustainable target distance to this facility, a minor negative impact on the access of site end users to secondary education would be expected.

## SA11: Economy

- 3.4.20 **Primary Employment Location:** Site GNLP5009 is located approximately 1.8km from Bowthorpe Employment Area in the outskirts of Norwich City, which would be expected to provide a range of employment opportunities for site end users and is within the sustainable target distance. Therefore, a minor positive impact on the local economy would be expected.

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## SA12: Transport and Access to Services

- 3.4.21 **Bus Stop:** Site GNLP5009 is located outside the target distance to a bus stop that provides a regular service. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.
- 3.4.22 **Railway Station:** Site GNLP5009 is located outside the target distance to a railway station, with the nearest being Norwich Railway Station situated over 7km to the east. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.
- 3.4.23 **Pedestrian Access:** Site GNLP5009 is well connected to the existing footpath network, via pavement. The proposed development at this site would be expected to have a minor positive impact on the access of site end users to the site and surrounding areas.
- 3.4.24 **Road Network:** Site GNLP5009 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 local accessibility.

## SA13: Historic Environment

- 3.4.25 **Grade II\* Listed Building:** Site GNLP5009 is located approximately 260m from the Grade II\* Listed Building 'The Slipper Chapel in Garden of Brecon House' and 280m from 'The Hermit's House'. The site is separated from these Listed Buildings by the undeveloped River Yare corridor. 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.
- 3.4.26 **Conservation Area:** Site GNLP5009 is located approximately 170m from 'Bawburgh' CA. The proposed development at this site could potentially alter the setting of this CA to some extent, and as such have a minor negative impact on the local historic environment.
- 3.4.27 **Scheduled Monument:** Site GNLP5009 is located approximately 280m from 'Two Garden Houses near the Hall' SM, across the undeveloped River Yare corridor. The proposed development at this site could potentially have a minor negative impact on the setting of this SM.

## SA14: Natural Resources, Waste and Contaminated Land

- 3.4.28 **Previously Developed Land:** Site GNLP5009 is located upon 0.59ha of previously undeveloped land. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- 3.4.29 **ALC:** Site GNLP5009 is situated upon ALC Grade 4, which is considered to be poor quality agricultural land. Therefore, a minor positive impact on natural resources could be expected as development would help to prevent the loss of BMV land across the Plan area.

### **SA15: Water**

- 3.4.30 **SPZ:** Site GNLP5009 coincides with the outer zone (Zone II) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.
- 3.4.31 **Watercourse:** Site GNLP5009 is located within 200m of the River Yare. 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.

### 3.5 Site GNL5013 – Ketteringham Recycling Centre (revised area)

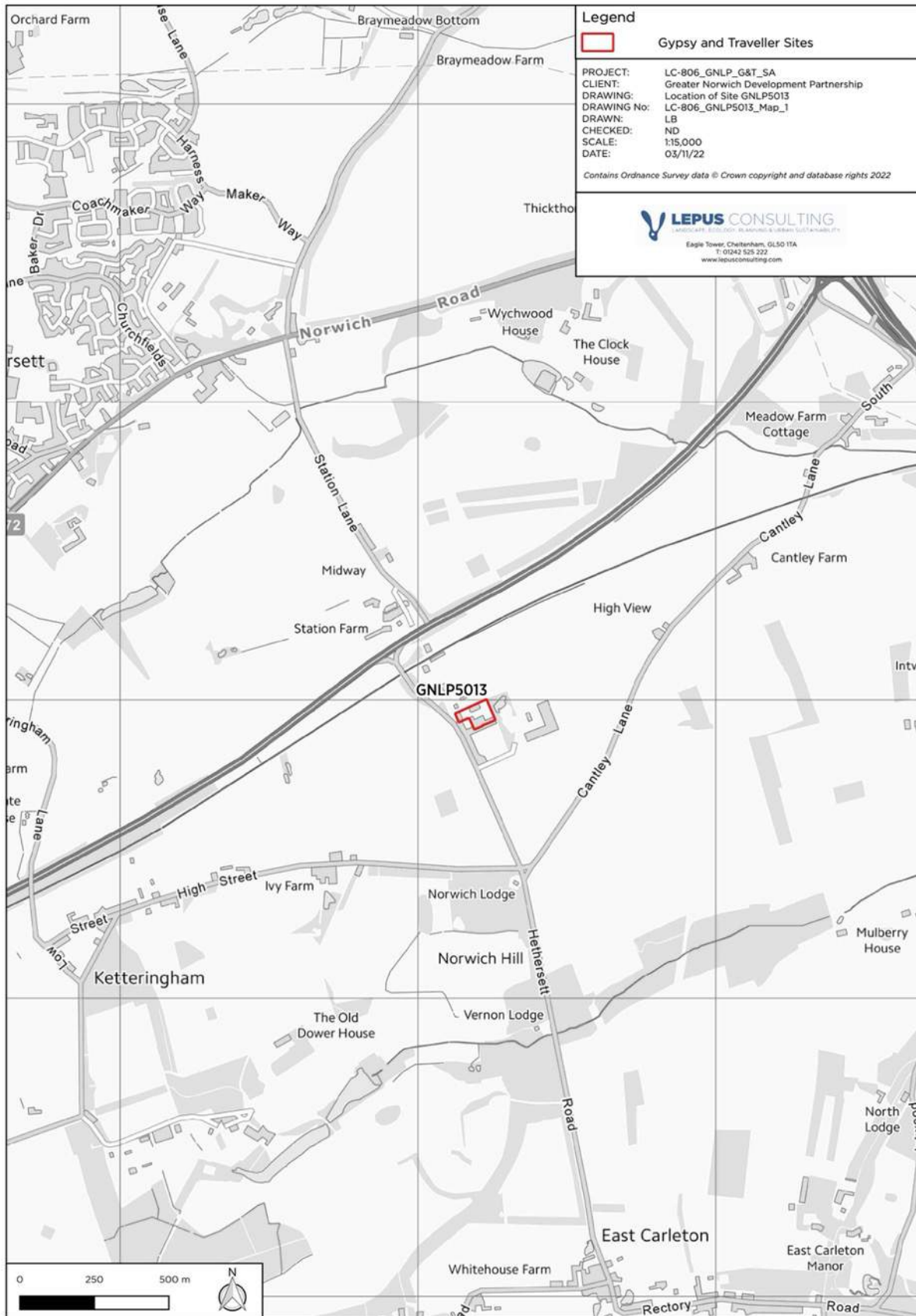


Figure 3.4: Location of proposed Gypsy and Traveller Site GNL5013

**Site GNLP5013: Site information and overall scores per SA Objective (pre-mitigation)**

Site Name		Area (ha)		Proposed No. of Pitches										
Ketteringham Recycling Centre (revised area)		0.70		10										
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	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
0	+	-	0	+	-	0	-	0	-	-	-	0	+	-

**SA1: Air Quality and Noise**

3.5.1 **Air and Noise Pollution:** Site GNLP5013 is proposed for small-scale development (10 Gypsy and Traveller pitches) and is situated away from major sources of air and noise pollution. A negligible impact on local air quality and noise would be expected.

**SA2: Climate Change Mitigation and Adaptation**

3.5.2 **Fluvial Flooding:** Site GNLP5013 is located wholly within Flood Zone 1. 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.

**SA3: Biodiversity, Geodiversity and Green Infrastructure**

3.5.3 **Habitats Sites:** Site GNLP5013 is located approximately 6.4km from ‘Norfolk Valley Fens’ SAC, 7km from ‘River Wensum’ SAC and 13.5km from ‘Broadland’ SPA/Ramsar and ‘The Broads’ SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

- 3.5.4 **SSSI IRZ:** Site GNLP5013 is located within a Nutrient Impact Area, 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”*. A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

#### **SA4: Landscape**

- 3.5.5 **Landscape Character:** Site GNLP5013 is located within the LCA ‘Yare Tributary Farmland with Parkland’. Some key characteristics of this LCA include meandering rivers, blocks of woodland, avenues of poplars and small villages with strong vernacular qualities. Site GNLP5013 comprises previously developed land and is situated amongst an existing industrial area. The proposed development at this site would be unlikely to affect any of these identified key characteristics, and therefore, a negligible impact on the landscape character would be expected.

#### **SA5: Housing**

- 3.5.6 **Provision of Pitches:** Site GNLP5013 is proposed for the development of 10 Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

#### **SA6: Population and Communities**

- 3.5.7 **Local Services:** The nearest local shop to Site GNLP5013 is Church Farm Shop, located approximately 1.4km to the north west of the site, or various shops and services in Hethersett, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

#### **SA7: Deprivation**

- 3.5.8 See **Table 2.4**, ‘SA7: Deprivation’.

#### **SA8: Health**

- 3.5.9 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5013 is Norfolk and Norwich University Hospital, located approximately 3.2km from the site, within the sustainable target distance. The proposed development at Site GNLP5013 would be expected to provide site end users with good access to this healthcare facility and therefore a minor positive impact would be expected.

- 3.5.10 **GP Surgery:** Site GNLP5013 is located approximately 2.2km from the closest GP surgery, 'Hethersett Surgery', outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.
- 3.5.11 **Leisure Facilities:** The closest leisure centre to Site GNLP5013 is 'Wymondham Leisure Centre', located approximately 6km from the site. Site GNLP5013 is located outside of 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.
- 3.5.12 **Main Road:** Site GNLP5013 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.
- 3.5.13 **Green Network:** Site GNLP5013 is located within 600m from the PRow network. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

#### **SA9: Crime**

- 3.5.14 See **Table 2.4**, 'SA9: Crime'.

#### **SA10: Education**

- 3.5.15 **Primary/Secondary School:** Site GNLP5013 is located approximately 1.7km from the closest primary schools, Hethersett Woodside Infant & Nursery School and Hethersett VC Junior School. The site is also located approximately 1.9km from the closest secondary school, Hethersett Academy. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

#### **SA11: Economy**

- 3.5.16 **Primary Employment Location:** Site GNLP5013 is located within the sustainable target distance of 5km from various employment locations, including the industrial/commercial area Penfold Drive in Wymondham, and Norwich and Norfolk University Hospital and other locations in the south west of Norwich City, which would be expected to provide a range of employment opportunities for site end users. Therefore, a minor positive impact on the local economy would be expected.
- 3.5.17 **Employment Floorspace:** Site GNLP5013 coincides with 'Ketteringham Depot' and 'Whites Staircases'. The proposed development of this site could potentially result in the loss of any employment opportunities currently associated with this location. Therefore, a minor negative impact could be expected following development at this site.



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## SA12: Transport and Access to Services

- 3.5.18 **Bus Stop:** Site GNLP5013 is located outside the target distance to a bus stop. The closest bus stop is located approximately 1.3km from the site on Norwich Road and provides several regular services including '13', '14' and '15' to Norwich City Centre and various other surrounding towns and villages. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.
- 3.5.19 **Railway Station:** Site GNLP5013 is located outside the target distance to a railway station, with the nearest being Wymondham Station situated approximately 6.4km to the south west. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.
- 3.5.20 **Pedestrian Access:** Site GNLP5013 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.
- 3.5.21 **Road Network:** Site GNLP5013 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.

## SA13: Historic Environment

- 3.5.22 **Heritage Assets:** The development proposed at Site GNLP5013 would be unlikely to significantly impact any surrounding heritage assets, and therefore, would be expected to have a negligible impact on the local historic environment.

## SA14: Natural Resources, Waste and Contaminated Land

- 3.5.23 **Previously Developed Land:** Site GNLP5013 comprises previously developed land. The proposed development at this site would be expected to have a minor positive impact on natural resources as development would be classed as an efficient use of land.

## SA15: Water

- 3.5.24 **SPZ:** Site GNLP5013 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.

### 3.6 Site GNL P5014 - Land adjacent to A47

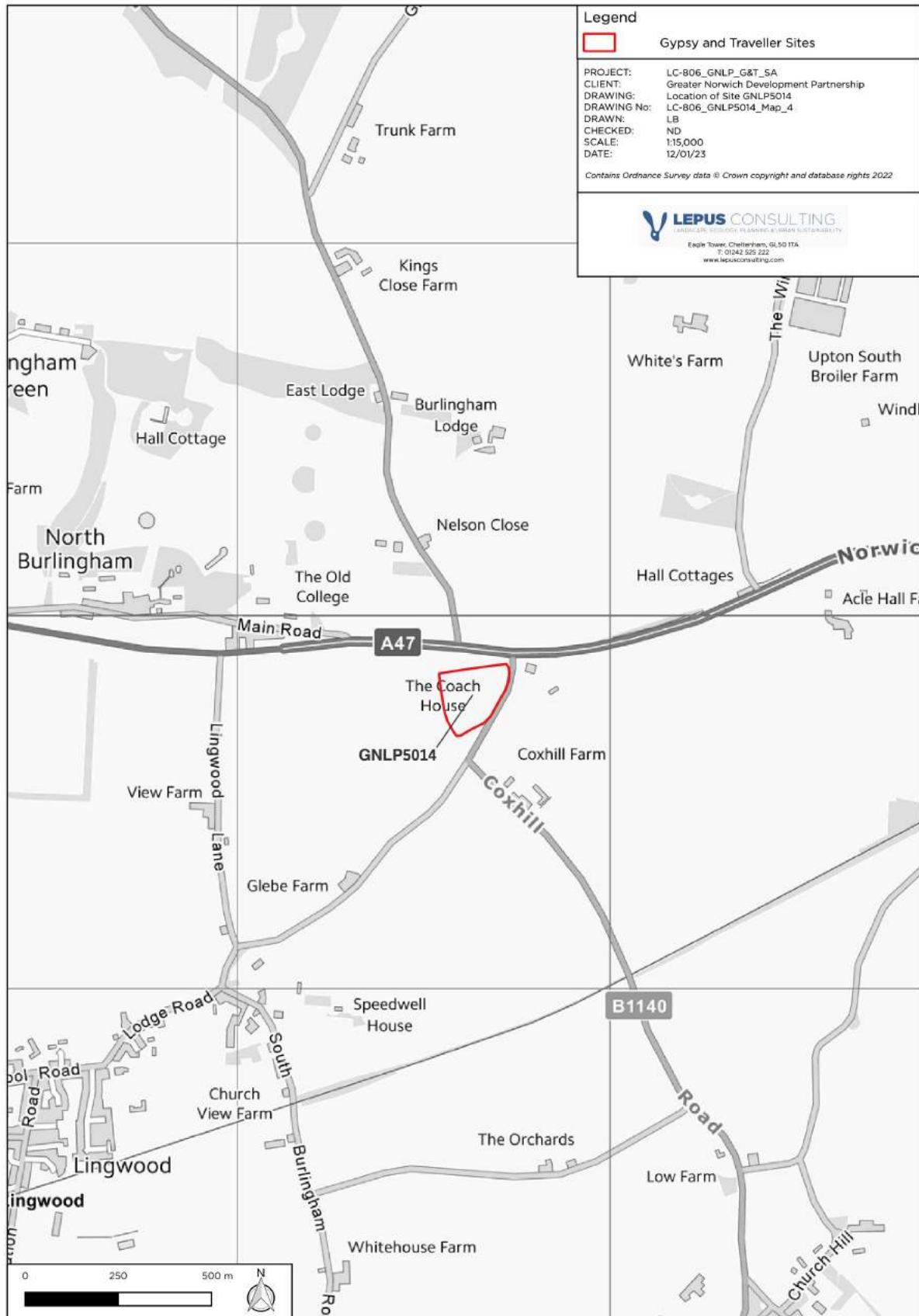


Figure 3.5: Location of proposed Gypsy and Traveller Site GNL P5014

**Site GNLP5014: Site information and overall scores per SA Objective (pre-mitigation)**

Site Name		Area (ha)		Proposed No. of Pitches										
Land adjacent to A47		1ha of 2.48ha larger site		15										
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	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
-	+	0	-	+	-	0	--	0	--	+	-	0	-	0

**SA1: Air Quality and Noise**

3.6.1 **Main Road:** The A47 passes to the north of Site GNLP5014, with the majority of the site within 200m of this main road. 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.

**SA2: Climate Change Mitigation and Adaptation**

3.6.2 **Fluvial Flooding:** Site GNLP5014 is located wholly within Flood Zone 1. 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.

**SA3: Biodiversity, Geodiversity and Green Infrastructure**

3.6.3 **Habitats Sites:** Site GNLP5014 is located approximately 2.5km from ‘Broadland’ SPA/Ramsar and ‘The Broads’ SAC, at its closest point. The site is also located approximately 17.5km from ‘River Wensum’ SAC, and 7.5km from ‘Breydon Water’ SPA/Ramsar. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

- 3.6.4 **SSSI IRZ:** Site GNLP5014 is located within an IRZ which states that “*Any discharge of water or liquid waste of more than 5m<sup>3</sup>/day to ground (i.e. to seep away) or to surface water, such as a beck or stream*”. It is uncertain at this stage whether the proposed Gypsy and Traveller development would exceed this threshold, and consequently whether adverse impacts on nearby SSSIs would occur.

#### **SA4: Landscape**

- 3.6.5 **Landscape Character:** Site GNLP5014 is located within the LCA ‘Blofield Tributary Farmland’. Some key characteristics of this LCA include the landscape setting of historic halls and churches, villages, and mosaic of arable fields with views to features. Site GNLP5014 comprises part of the open arable landscape surrounding Lingwood and Burlingham Green. The proposed development at this site could potentially be discordant with these key characteristics and would be expected to have a minor negative impact on the local landscape character.
- 3.6.6 **Urbanisation of the Countryside:** Site GNLP5014 comprises previously undeveloped land and is located outside of the existing settlements of Lingwood and Burlingham Green. 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.

#### **SA5: Housing**

- 3.6.7 **Provision of Pitches:** Site GNLP5014 is proposed for the development of 15 Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

#### **SA6: Population and Communities**

- 3.6.8 **Local Services:** The nearest local shop to Site GNLP5014 is SPAR in Lingwood, located approximately 2km to the south west of the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

#### **SA7: Deprivation**

- 3.6.9 See **Table 2.4**, ‘SA7: Deprivation’.

#### **SA8: Health**

- 3.6.10 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5014 is James Paget University Hospital, located approximately 16km from the site, outside the sustainable target distance. The proposed development at Site GNLP5014 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.

- 3.6.11 **GP Surgery:** Site GNLP5014 is located approximately 2.5km from the closest GP surgery, 'Dr Rolls & Partners' in Acle, outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.
- 3.6.12 **Leisure Facilities:** The closest leisure centre to Site GNLP5014 is 'Riverside Leisure Centre' in Norwich City, located approximately 13.5km from the site. Site GNLP5014 is located outside of 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.
- 3.6.13 **Main Road:** Site GNLP5014 is located adjacent to the A47. 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.
- 3.6.14 **Green Network:** The majority of Site GNLP5014 is located within 600m from public greenspace, including religious grounds and a bowling green. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.
- 3.6.15 As Site GNLP5014 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.

#### **SA9: Crime**

- 3.6.16 See **Table 2.4**, 'SA9: Crime'.

#### **SA10: Education**

- 3.6.17 **Primary/Secondary School:** Site GNLP5014 is located approximately 1.9km from the closest primary school, Lingwood Primary School. The site is also located approximately 2.2km from the closest secondary school, Acle Academy. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

#### **SA11: Economy**

- 3.6.18 **Primary Employment Location:** Site GNLP5014 is located approximately 3km from the market town of Acle, which would be expected to provide a range of employment opportunities for site end users and is within the sustainable target distance. Therefore, a minor positive impact on the local economy would be expected.

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## SA12: Transport and Access to Services

- 3.6.19 **Bus Stop:** Site GNLP5014 is located outside the target distance to a bus stop. The closest bus stops can be found in Lingwood, including a bus stop along Station Road approximately 1.6km from the site, which provides regular service '15A' to Wymondham. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.
- 3.6.20 **Railway Station:** Site GNLP5014 is located within the target distance to Lingwood Railway Station. The proposed development at this site would be likely to have a minor positive impact on the access of site end users to rail services.
- 3.6.21 **Pedestrian Access:** Site GNLP5014 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.
- 3.6.22 **Road Network:** Site GNLP5014 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.

## SA13: Historic Environment

- 3.6.23 **Heritage Assets:** The development proposed at Site GNLP5014 would be unlikely to significantly impact any surrounding heritage assets, and therefore, would be expected to have a negligible impact on the local historic environment.

## SA14: Natural Resources, Waste and Contaminated Land

- 3.6.24 **Previously Developed Land:** Site GNLP5014 comprises 2.48ha of previously undeveloped land, with the proposed Gypsy and Traveller pitches to be located on up to 1.00ha of this wider site. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- 3.6.25 **ALC:** Site GNLP5014 is situated upon ALC Grade 1 land which represents 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.

## SA15: Water

- 3.6.26 **Water Quality:** Site GNLP5014 is located over 200m from a watercourse and does not coincide with a groundwater SPZ. Therefore, the proposed development at this site would be expected to have a negligible impact on local water receptors considered in this assessment. However, it should be noted that the emerging HRA will explore potential for wider water quality issues relating to nutrient thresholds (see SA3: Biodiversity).



### 3.7 Site GNL P5019 – Land at Woodland Stable, Shortthorn Road, Stratton Strawless



Figure 3.6: Location of proposed Gypsy and Traveller Site GNL P5019



**Site GNLP5019: Site information and overall scores per SA Objective (pre-mitigation)**

Site Name		Area (ha)		Proposed No. of Pitches										
Land at Woodland Stable, Shortthorn Road, Stratton Strawless		0.33		4										
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	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
0	-	-	0	+	-	0	--	0	--	+	--	0	-	0

**SA1: Air Quality and Noise**

3.7.1 **Air and Noise Pollution:** Site GNLP5019 is proposed for small-scale development (four Gypsy and Traveller pitches) and is situated away from major sources of air and noise pollution. A negligible impact on local air quality and noise would be expected.

**SA2: Climate Change Mitigation and Adaptation**

3.7.2 **Fluvial Flooding:** Site GNLP5019 is located wholly within Flood Zone 1. 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.

3.7.3 **Surface Water Flooding:** A small proportion of Site GNLP5019 in the south coincides with an area determined to be at low risk of surface water flooding. The proposed development at this site could potentially have a minor negative impact on surface water flood risk, as development could potentially locate some site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

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### SA3: Biodiversity, Geodiversity and Green Infrastructure

- 3.7.4 **Habitats Sites:** Site GNLP5019 is located approximately 2.3km from ‘Norfolk Valley Fens’ SAC, 5.6km from ‘River Wensum’ SAC and 7.8km from ‘Broadland’ SPA/Ramsar and ‘The Broads’ SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.
- 3.7.5 **SSSI IRZ:** Site GNLP5019 is located within a Nutrient Impact Area, 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”*. A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

### SA4: Landscape

- 3.7.6 **Landscape Character:** Site GNLP5019 is located within the LCA ‘Horsford Woodland Heath Mosaic’. Some key characteristics of this LCA include extensive blocks of woodland, remnant patches of heathland and fen, and small-scale settlement. Site GNLP5019 comprises a small area of scrub / trees, situated adjacent to an existing Gypsy and Traveller site, and bounded by woodland to the north. The proposed development of four Gypsy and Traveller pitches at this site would be unlikely to significantly affect any of these identified key characteristics, and therefore, a negligible impact on the landscape character would be expected.

### SA5: Housing

- 3.7.7 **Provision of Pitches:** Site GNLP5019 is proposed for the development of four Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

### SA6: Population and Communities

- 3.7.8 **Local Services:** The nearest local shop to Site GNLP5019 is Co-op in Horsford, located approximately 3.2km from the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

### SA7: Deprivation

- 3.7.9 See **Table 2.4**, ‘SA7: Deprivation’.

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## SA8: Health

- 3.7.10 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5019 is Norfolk and Norwich University Hospital, located approximately 12km from the site, outside the sustainable target distance. The proposed development at Site GNLP5019 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.
- 3.7.11 **GP Surgery:** Site GNLP5019 is located approximately 2.6km from the closest GP surgery, 'Dr O'Neil' in Horsford, outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.
- 3.7.12 **Leisure Facilities:** The closest leisure centre to Site GNLP5019 is 'Riverside Leisure Centre', located approximately 12.5km from the site. Site GNLP5019 is located outside of 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.
- 3.7.13 **Main Road:** Site GNLP5019 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.
- 3.7.14 **Green Network:** Site GNLP5019 is located within 600m from public greenspace, including a cemetery. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.
- 3.7.15 As Site GNLP5019 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.

## SA9: Crime

- 3.7.16 See **Table 2.4**, 'SA9: Crime'.

## SA10: Education

- 3.7.17 **Primary/Secondary School:** Site GNLP5019 is located approximately 2.1km from the closest primary school, Hevingham Primary School. The site is also located approximately 5.4km from the closest secondary school, Taverham High School. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

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### SA11: Economy

- 3.7.18 **Primary Employment Location:** Site GNLP5019 is located approximately 500m from Woodland Park Industrial Estate, and approximately 5km from Taverham in the outskirts of Norwich. These areas would be expected to provide a range of employment opportunities for site end users, within the sustainable target distance. Therefore, a minor positive impact on the local economy would be expected.

### SA12: Transport and Access to Services

- 3.7.19 **Bus Stop:** Site GNLP5019 is located outside the target distance to a bus stop. The closest bus stop is located approximately 800m from the site on Shortthorn Road and provides regular service '43A' and '45B' from Holt to Norwich City Centre. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.
- 3.7.20 **Railway Station:** Site GNLP5019 is located outside the target distance to a railway station, with the nearest being Norwich Station situated approximately 12km to the south east. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.
- 3.7.21 **Pedestrian Access:** Site GNLP5019 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.
- 3.7.22 **Road Network:** Site GNLP5019 is not accessible from the current road network. Therefore, the proposed development at this site could potentially result in a minor negative impact on accessibility.
- 3.7.23 Site GNLP5019 is located outside of the sustainable target distance to a bus stop and railway station and is poorly connected to the current road and footpath networks. Therefore, a major negative impact on travel and accessibility would be expected at this site.

### SA13: Historic Environment

- 3.7.24 **Heritage Assets:** The development proposed at Site GNLP5019 would be unlikely to significantly impact any surrounding heritage assets, and therefore, would be expected to have a negligible impact on the local historic environment.

### SA14: Natural Resources, Waste and Contaminated Land

- 3.7.25 **Previously Developed Land:** Site GNLP5019 is located upon 0.33ha of previously undeveloped land. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

3.7.26 **ALC:** Site GNLP5019 is situated on land which is classed as ‘non-agricultural’ ALC. A minor positive impact would therefore be expected as development at this site would be likely to help prevent the loss of BMV land across the Plan area.

#### **SA15: Water**

3.7.27 **Water Quality:** Site GNLP5019 is located over 200m from a watercourse and does not coincide with a groundwater SPZ. Therefore, the proposed development at this site would be expected to have a negligible impact on local water receptors considered in this assessment. However, it should be noted that the emerging HRA will explore potential for wider water quality issues relating to nutrient thresholds (see SA3: Biodiversity).

### 3.8 Site GNL P5020 – Land at Romany Meadow, The Turnpike, Carleton Rode

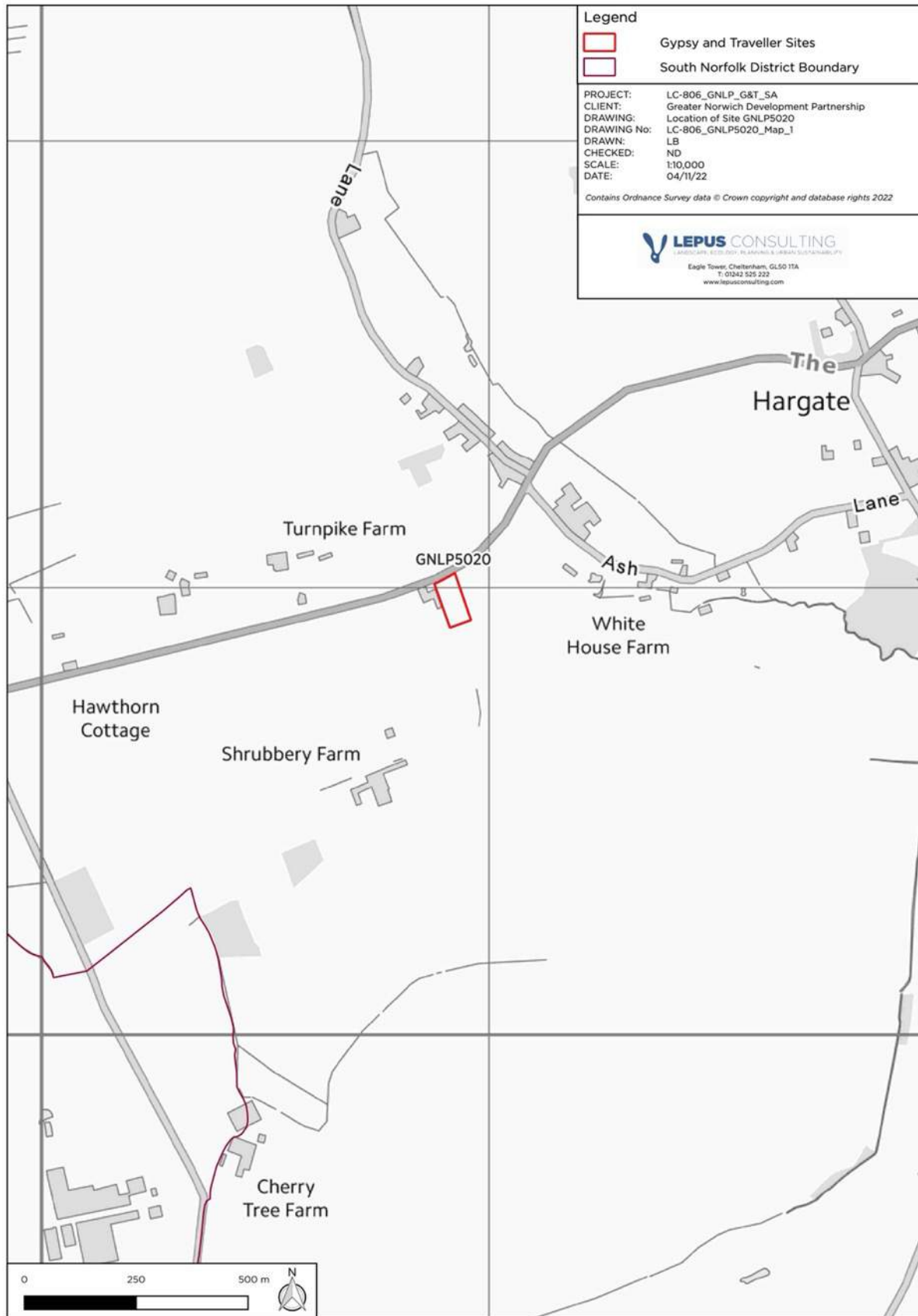


Figure 3.7: Location of proposed Gypsy and Traveller Site GNL P5020

**Site GNLP5020: Site information and overall scores per SA Objective (pre-mitigation)**

Site Name		Area (ha)		Proposed No. of Pitches										
Land at Romany Meadow, The Turnpike, Carleton Rode		0.54		6										
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	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
0	-	-	0	+	-	0	--	0	--	-	-	0	-	-

**SA1: Air Quality and Noise**

3.8.1 **Air and Noise Pollution:** Site GNLP5020 is proposed for small-scale development (six Gypsy and Traveller pitches) and is situated away from major sources of air and noise pollution. A negligible impact on local air quality and noise would be expected.

**SA2: Climate Change Mitigation and Adaptation**

3.8.2 **Fluvial Flooding:** Site GNLP5020 is located wholly within Flood Zone 1. 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.

3.8.3 **Surface Water Flooding:** A large proportion of Site GNLP5020 in the south coincides with an area determined to be at low risk of surface water flooding, and a small proportion of the site in the east is within an area of medium risk. The proposed development at this site could potentially have a minor negative impact on surface water flood risk, as development could potentially locate some site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.



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### SA3: Biodiversity, Geodiversity and Green Infrastructure

- 3.8.4 **Habitats Sites:** Site GNLP5020 is located approximately 9.2km from ‘Norfolk Valley Fens’ SAC, 11km from ‘Waveney & Little Ouse Valley Fens’ SAC and ‘Redgrave & South Lopham Fens’ Ramsar site. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.
- 3.8.5 **SSSI IRZ:** Site GNLP5020 is located within a Nutrient Impact Area, 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”*. A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

### SA4: Landscape

- 3.8.6 **Landscape Character:** Site GNLP5020 is located within the LCA ‘Tas Tributary Farmland’. Some key characteristics of this LCA include large, open arable fields, blocks of woodland and open views. Site GNLP5020 comprises a small field, enclosed by hedgerows and trees, adjacent to an existing Gypsy and Traveller site. The proposed development of six Gypsy and Traveller pitches at this site would be unlikely to affect any of these identified key characteristics, and therefore, a negligible impact on the landscape character would be expected.

### SA5: Housing

- 3.8.7 **Provision of Pitches:** Site GNLP5020 is proposed for the development of six Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

### SA6: Population and Communities

- 3.8.8 **Local Services:** The nearest local shop to Site GNLP5020 is Kings Stores in New Buckenham, located approximately 2.2km to the west of the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

### SA7: Deprivation

- 3.8.9 See **Table 2.4**, ‘SA7: Deprivation’.

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## SA8: Health

- 3.8.10 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5020 is Norfolk and Norwich University Hospital, located approximately 17.5km from the site, outside the sustainable target distance. The proposed development at Site GNLP5020 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.
- 3.8.11 **GP Surgery:** Site GNLP5020 is located approximately 5.5km from the closest GP surgery, 'Dr Rolls & Partners' in Sneath Common, outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.
- 3.8.12 **Leisure Facilities:** The closest leisure centre to Site GNLP5020 is 'Long Stratton Leisure Centre', located approximately 8.6km from the site. Site GNLP5020 is located outside of 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.
- 3.8.13 **Main Road:** Site GNLP5020 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.
- 3.8.14 **Green Network:** Site GNLP5020 is located within 600m from the PRow network. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.
- 3.8.15 As Site GNLP5020 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.

## SA9: Crime

- 3.8.16 See **Table 2.4**, 'SA9: Crime'.

## SA10: Education

- 3.8.17 **Primary/Secondary School:** Site GNLP5020 is located approximately 1.5km from the closest primary school, Carleton Rode C of E VA Primary School. The site is also located approximately 4.2km from the closest secondary school, Old Buckenham High School. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

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### SA11: Economy

- 3.8.18 **Primary Employment Location:** Site GNLP5020 is located in a rural area, with the closest primary employment locations being the market town of Wymondham to the north, and Diss to the south, over 5km from the site and outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to employment.

### SA12: Transport and Access to Services

- 3.8.19 **Bus Stop:** Site GNLP5020 is located outside the target distance to a bus stop. The closest bus stop is located approximately 1km from the site on Fen Road and provides regular service '37A' from East Harling to Norwich City Centre. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.
- 3.8.20 **Railway Station:** Site GNLP5020 is located outside the target distance to a railway station, with the nearest being Spooner Row Station situated approximately 6.5km to the north. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.
- 3.8.21 **Pedestrian Access:** Site GNLP5020 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.
- 3.8.22 **Road Network:** Site GNLP5020 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.

### SA13: Historic Environment

- 3.8.23 **Heritage Assets:** The development proposed at Site GNLP5020 would be unlikely to significantly impact any surrounding heritage assets, and therefore, would be expected to have a negligible impact on the local historic environment.

### SA14: Natural Resources, Waste and Contaminated Land

- 3.8.24 **Previously Developed Land:** Site GNLP5020 is located upon 0.54ha of previously undeveloped land. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- 3.8.25 **ALC:** Site GNLP5020 is situated upon ALC Grade 3 land which could potentially 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.

### **SA15: Water**

- 3.8.26 **SPZ:** Site GNLP5020 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.

### 3.9 Site GNL P5021 – The Old Produce Shop, Holt Road, Horsford

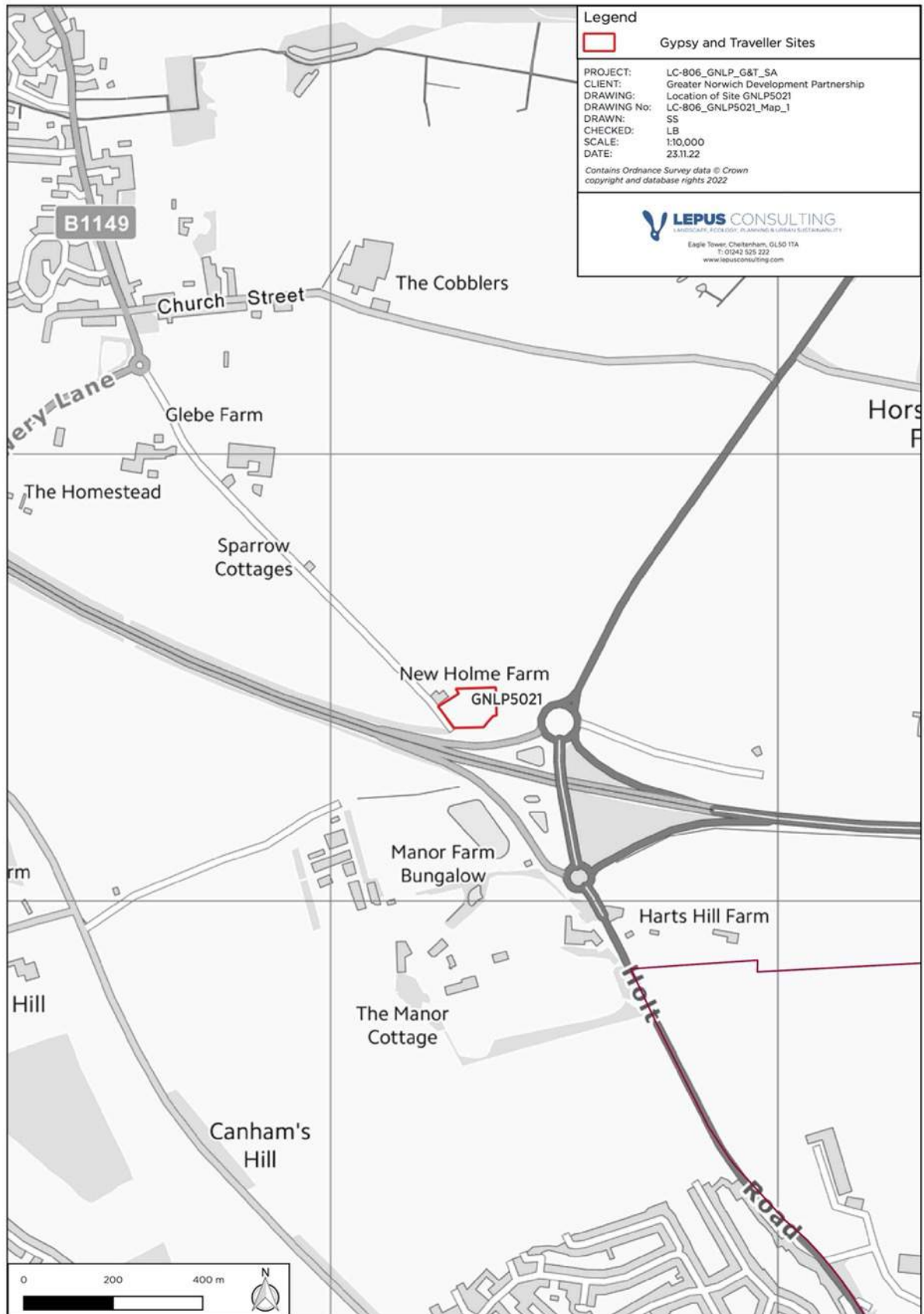


Figure 3.8: Location of proposed Gypsy and Traveller Site GNL P5021

**Site GNLP5021: Site information and overall scores per SA Objective (pre-mitigation)**

Site Name		Area (ha)	Proposed No. of Pitches												
The Old Produce Shop, Holt Road, Horsford		0.90	6												
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	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water	
-	+	-	0	+	-	0	--	0	--	+	-	0	-	-	

**SA1: Air Quality and Noise**

3.9.1 **Main Road:** Site GNLP5021 is located adjacent to the A1270/A140 roundabout, with the entirety of the site within 200m of these main roads. 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 A1270 and A140 would be expected to have a minor negative impact on air quality and noise at this site.

**SA2: Climate Change Mitigation and Adaptation**

3.9.2 **Fluvial Flooding:** Site GNLP5021 is located wholly within Flood Zone 1. 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.

**SA3: Biodiversity, Geodiversity and Green Infrastructure**

3.9.3 **Habitats Sites:** Site GNLP5021 is located approximately 7.5km from ‘Norfolk Valley Fens’ SAC, 2.3km from ‘River Wensum’ SAC and 6km from ‘Broadland’ SPA/Ramsar and ‘The Broads’ SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

- 3.9.4 **SSSI IRZ:** Site GNLP5021 is located within a Nutrient Impact Area, 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*”. A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

#### **SA4: Landscape**

- 3.9.5 **Landscape Character:** Site GNLP5021 is located within the LCA ‘Spixworth Wooded Estatelands’. Some key characteristics of this LCA include blocks of woodland and hedgerows, and the landscape setting of villages, historic houses and halls. Due to the expected small-scale development (six Gypsy and Traveller pitches) situated adjacent to existing rural buildings and the Broadland Northway roundabout, it is not anticipated that development proposals would be discordant with this LCA. Therefore, a negligible impact on the landscape character would be expected.

#### **SA5: Housing**

- 3.9.6 **Provision of Pitches:** Site GNLP5021 is proposed for the development of six Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

#### **SA6: Population and Communities**

- 3.9.7 **Local Services:** The nearest local shop to Site GNLP5021 is St Faiths Post Office and Stores, located approximately 1.4km to the north east of the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.
- 3.9.8 **Local Landscape Designations:** Site GNLP5021 is located within 600m from outdoor sports facilities (Horsford Manor Cricket Ground). The proposed development at this site could potentially provide site end users with good access to this asset, and as such, result in a minor positive impact on opportunities for integration with the local community.

#### **SA7: Deprivation**

- 3.9.9 See **Table 2.4**, ‘SA7: Deprivation’.

#### **SA8: Health**

- 3.9.10 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5021 is Norfolk and Norwich University Hospital, located approximately 7.6km from the site, outside the sustainable target distance. The proposed development at Site GNLP5021 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.



- 3.9.11 **GP Surgery:** Site GNLP5021 is located approximately 1.4km from the closest GP surgery, 'Dr Stone & Partners' in Hellesdon, outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.
- 3.9.12 **Leisure Facilities:** The closest leisure centre to Site GNLP5021 is 'Riverside Leisure Centre', located approximately 7.5km from the site. Site GNLP5021 is located outside of 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.
- 3.9.13 **Main Road:** Site GNLP5021 is located adjacent to the A1270/A140 roundabout. 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.
- 3.9.14 **Green Network:** Site GNLP5021 is located within 600m from public greenspace, including a playing field. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.
- 3.9.15 As Site GNLP5021 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.

#### **SA9: Crime**

- 3.9.16 See **Table 2.4**, 'SA9: Crime'.

#### **SA10: Education**

- 3.9.17 **Primary/Secondary School:** Site GNLP5021 is located approximately 1.3km from the closest primary school, Arden Grove Infant and Nursery School, and approximately 2km from the nearest school providing education for all primary ages, St Faiths C of E VC Primary School. The site is also located approximately 2.6km from the closest secondary school, Hellesdon High School. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

#### **SA11: Economy**

- 3.9.18 **Primary Employment Location:** Site GNLP5021 is located within 5km from a range of employment opportunities in the north of Norwich City, including Norwich Airport and various industrial and commercial areas, which would be expected to provide a range of employment opportunities for site end users and are within the sustainable target distance. Therefore, a minor positive impact on the local economy would be expected.

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## SA12: Transport and Access to Services

- 3.9.19 **Bus Stop:** Site GNLP5021 is located outside the target distance to a bus stop. The closest bus stop is located approximately 1.2km from the site on Holt Road and provides regular services including '36' from Horsford to Norwich City Centre. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.
- 3.9.20 **Railway Station:** Site GNLP5021 is located outside the target distance to a railway station, with the nearest being Norwich Railway Station situated over 7km to the south east. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.
- 3.9.21 **Pedestrian Access:** Site GNLP5021 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.
- 3.9.22 **Road Network:** Site GNLP5021 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.

## SA13: Historic Environment

- 3.9.23 **Heritage Assets:** The development proposed at Site GNLP5021 would be unlikely to significantly impact any surrounding heritage assets, and therefore, would be expected to have a negligible impact on the local historic environment.

## SA14: Natural Resources, Waste and Contaminated Land

- 3.9.24 **Previously Developed Land:** Site GNLP5021 comprises 0.90ha, the majority of which is previously undeveloped land. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- 3.9.25 **ALC:** Site GNLP5021 is situated upon ALC Grade 3 land which could potentially 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.

## SA15: Water

- 3.9.26 **SPZ:** Site GNLP5021 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.

### 3.10 Site GNL P5022 – The Oaks, Foulsham

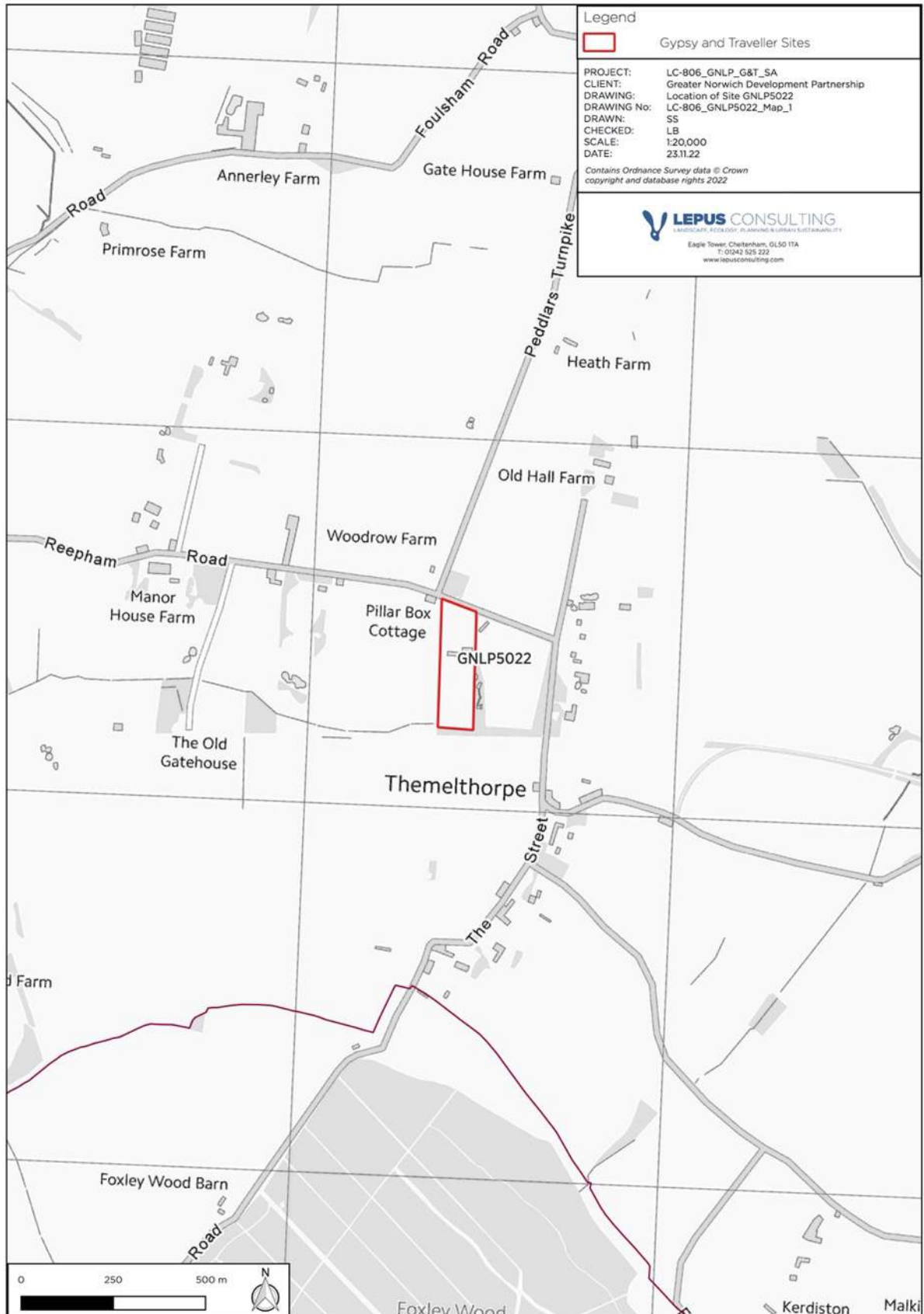


Figure 3.9: Location of proposed Gypsy and Traveller Site GNL P5022

**Site GNLP5022: Site information and overall scores per SA Objective (pre-mitigation)**

Site Name		Area (ha)		Proposed No. of Pitches										
The Oaks, Foulsham		3.19		5										
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	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
0	-	-	0	+	-	0	--	0	--	+	-	0	-	-

**SA1: Air Quality and Noise**

3.10.1 **Air and Noise Pollution:** Site GNLP5022 is proposed for small-scale development (five Gypsy and Traveller pitches) and is situated away from major sources of air and noise pollution. A negligible impact on local air quality and noise would be expected.

**SA2: Climate Change Mitigation and Adaptation**

3.10.2 **Fluvial Flooding:** Site GNLP5022 is located wholly within Flood Zone 1. 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.

3.10.3 **Surface Water Flooding:** A small proportion of Site GNLP5022 in the south coincides with an area determined to be at low risk of surface water flooding. The proposed development at this site could potentially have a minor negative impact on surface water flood risk, as development could potentially locate some site end users in areas at risk of surface water flooding, as well as exacerbate surface water flood risk in surrounding locations.

**SA3: Biodiversity, Geodiversity and Green Infrastructure**

3.10.4 **Habitats Sites:** Site GNLP5022 is located approximately 5.6km from ‘Norfolk Valley Fens’ SAC, 4.8km from ‘River Wensum’ SAC and 21km from ‘Broadland’ SPA/Ramsar and ‘The Broads’ SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

- 3.10.5 **SSSI IRZ:** Site GNLP5022 is located within a Nutrient Impact Area, 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”*. A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

#### **SA4: Landscape**

- 3.10.6 **Landscape Character:** Site GNLP5022 is located within the LCA ‘Foulsham and Reephram Plateau Farmland’. Some key characteristics of this LCA include the distinctive field pattern, wide views to churches and the setting of manors, halls and churches. Due to the expected small-scale development (five Gypsy and Traveller pitches) situated adjacent to an existing Gypsy and Traveller site, it is not anticipated that development proposals would be discordant with this LCA. Therefore, a negligible impact on the landscape character would be expected.

#### **SA5: Housing**

- 3.10.7 **Provision of Pitches:** Site GNLP5022 is proposed for the development of five Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

#### **SA6: Population and Communities**

- 3.10.8 **Local Services:** The nearest local shop to Site GNLP5022 is The Village Store in Foulsham, located approximately 2.2km to the north west of the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

#### **SA7: Deprivation**

- 3.10.9 See **Table 2.4**, ‘SA7: Deprivation’.

#### **SA8: Health**

- 3.10.10 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5022 is Norfolk and Norwich University Hospital, located approximately 21.5km from the site, outside the sustainable target distance. The proposed development at Site GNLP5022 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.
- 3.10.11 **GP Surgery:** Site GNLP5022 is located approximately 4.5km from the closest GP surgery, ‘Reephram Surgery’, outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.

- 3.10.12 **Leisure Facilities:** The closest leisure centre to Site GNLP5022 is 'Dereham Leisure Centre', located approximately 13km from the site. Site GNLP5022 is located outside of 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.
- 3.10.13 **Main Road:** Site GNLP5022 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.
- 3.10.14 **Green Network:** Site GNLP5022 is located within 600m from public greenspace, including religious grounds. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.
- 3.10.15 As Site GNLP5022 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.

#### **SA9: Crime**

- 3.10.16 See **Table 2.4**, 'SA9: Crime'.

#### **SA10: Education**

- 3.10.17 **Primary/Secondary School:** Site GNLP5022 is located approximately 2.2km from the closest primary school, Foulsham Primary School. The site is also located approximately 4.6km from the closest secondary school, Reepham High School. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

#### **SA11: Economy**

- 3.10.18 **Primary Employment Location:** Site GNLP5022 is located approximately 4.8km from the market town of Reepham, which would be expected to provide a range of employment opportunities for site end users and is within the sustainable target distance. Therefore, a minor positive impact on the local economy would be expected.

#### **SA12: Transport and Access to Services**

- 3.10.19 **Bus Stop:** Site GNLP5022 is located outside the target distance to a bus stop. The closest bus stop is located approximately 2.2km from the site on Station Road and provides service '80' to Dereham and '98' to Fakenham. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.

- 3.10.20 **Railway Station:** Site GNLP5022 is located outside the target distance to a railway station, with the nearest being Sheringham Railway Station situated over 21km to the north east, and Norwich Railway Station situated over 24km to the south east. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.
- 3.10.21 **Pedestrian Access:** Site GNLP5022 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.
- 3.10.22 **Road Network:** Site GNLP5022 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.

### SA13: Historic Environment

- 3.10.23 **Grade II\* Listed Building:** Site GNLP5022 is located approximately 330m from the Grade II\* Listed Building 'Church of St Andrew'. This Listed Building is situated amongst the existing settlement and surrounded by trees. Due to these factors, and the expected small number of pitches at this existing Gypsy and Traveller site, it is not anticipated that it would affect the setting of this Listed Building. Therefore, the proposed development at this site would be expected to result in a negligible impact on the historic environment.
- 3.10.24 **Grade II Listed Building:** Site GNLP5022 is located approximately 290m from the Grade II Listed Building 'The Old Hall'. This Listed Building is situated amongst the existing settlement and surrounded by trees. Due to these factors, and the expected small number of pitches at this existing Gypsy and Traveller site, it is not anticipated that it would affect the setting of this Listed Building. Therefore, the proposed development at this site would be expected to result in a negligible impact on the historic environment.

### SA14: Natural Resources, Waste and Contaminated Land

- 3.10.25 **Previously Developed Land:** Site GNLP5022 comprises 3.19ha, the majority of which is previously undeveloped land. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- 3.10.26 **ALC:** Site GNLP5022 is situated upon ALC Grade 3 land which could potentially 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.

### SA15: Water

- 3.10.27 **SPZ:** Site GNLP5022 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.



### 3.11 Site GNL P5023 – Strayground Lane, Wymondham

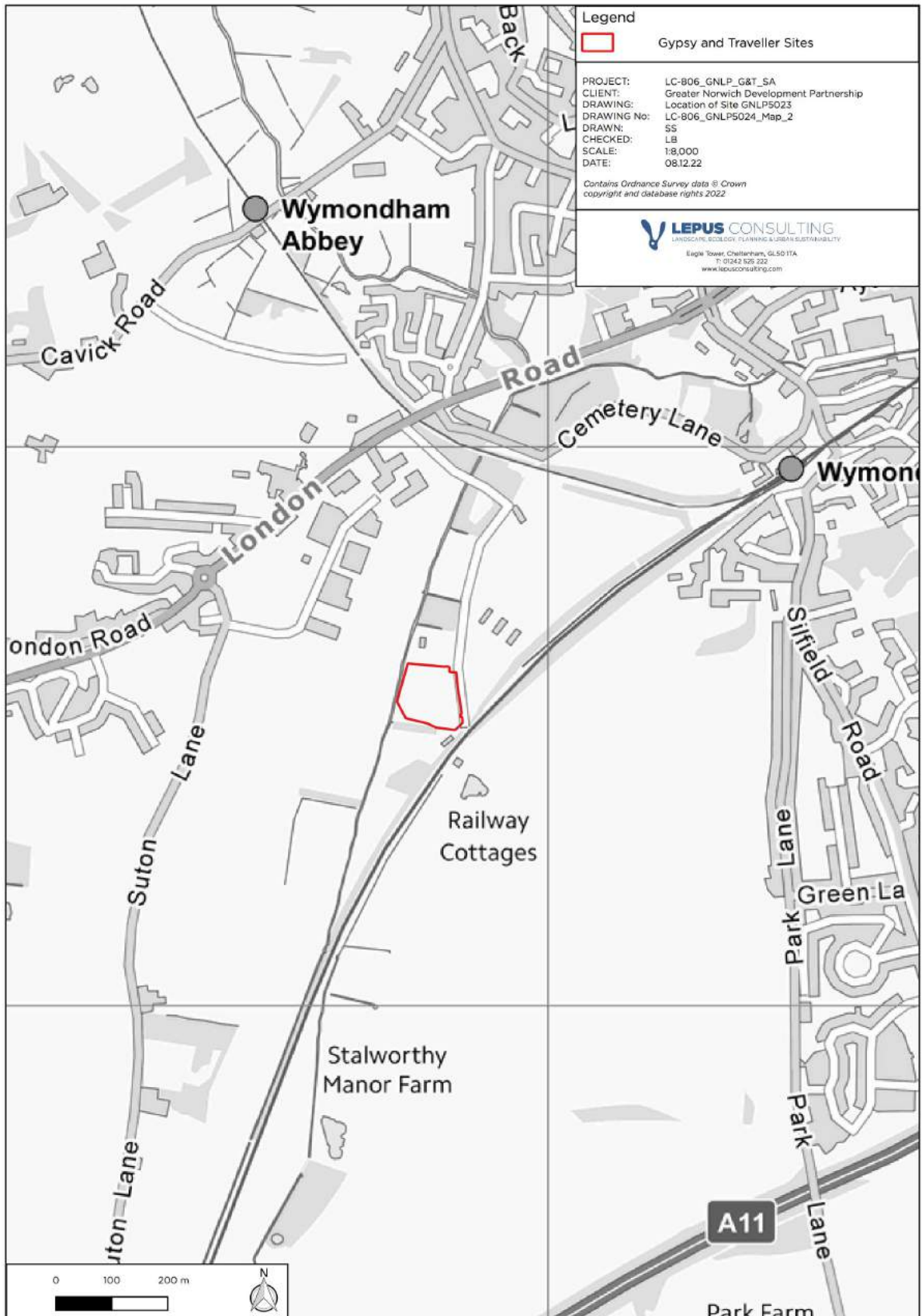


Figure 3.10: Location of proposed Gypsy and Traveller Site GNL P5023

**Site GNLP5023: Site information and overall scores per SA Objective (pre-mitigation)**

Site Name		Area (ha)		Proposed No. of Pitches										
Strayground Lane, Wymondham		1.19		10										
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	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
-	+	-	-	+	-	0	-	0	-	+	-	0	-	-

**SA1: Air Quality and Noise**

3.11.1 **Railway Line:** Site GNLP5023 is located within 200m of a railway line, therefore the proposed development at this site could potentially expose site end users to higher levels of noise pollution and vibrations associated with this railway. A minor negative impact would be expected.

**SA2: Climate Change Mitigation and Adaptation**

3.11.2 **Fluvial Flooding:** Site GNLP5023 is located wholly within Flood Zone 1. 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.

**SA3: Biodiversity, Geodiversity and Green Infrastructure**

3.11.3 **Habitats Sites:** Site GNLP5023 is located approximately 8km from ‘Norfolk Valley Fens’ SAC, 13.4km from ‘River Wensum’ SAC and 20km from ‘Broadland’ SPA/Ramsar and ‘The Broads’ SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

- 3.11.4 **SSSI IRZ:** Site GNLP5023 is located within a Nutrient Impact Area, 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*”. A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.
- 3.11.5 **County Wildlife Site:** Site GNLP5023 is located adjacent to ‘Bays River Meadow North’ CWS. The proposed development at this site could potentially have a minor negative impact on this CWS due to increased development related threats and pressures.
- 3.11.6 **Priority Habitats:** Site GNLP5023 wholly coincides with lowland fens priority habitat. Therefore, the proposed development at this site would be likely to result in the loss or degradation of this habitat, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area.

#### **SA4: Landscape**

- 3.11.7 **Landscape Character:** Site GNLP5023 is located within the LCA ‘Tiffey Tributary Farmland’. Some key characteristics of this LCA include large scale arable farmland, water bodies, sparse settlements and long views. Site GNLP5023 comprises previously undeveloped land including trees and hedgerow boundaries, forming part of the undeveloped approach to Wymondham along the Bays River valley. The proposed development at this site could potentially be discordant with the key characteristics of this LCA and would be expected to have a minor negative impact on the local landscape character.
- 3.11.8 **Urbanisation of the Countryside:** Site GNLP5023 comprises previously undeveloped land and is located outside of Wymondham. 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.

#### **SA5: Housing**

- 3.11.9 **Provision of Pitches:** Site GNLP5023 is proposed for the development of 10 Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

#### **SA6: Population and Communities**

- 3.11.10 **Local Services:** The nearest local shop to Site GNLP5023 is Co-op, located just over 600m from the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

#### **SA7: Deprivation**

- 3.11.11 See **Table 2.4**, ‘SA7: Deprivation’.

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## SA8: Health

- 3.11.12 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5023 is Norfolk and Norwich University Hospital, located approximately 9.8km from the site, outside the sustainable target distance. The proposed development at Site GNLP5023 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.
- 3.11.13 **GP Surgery:** Site GNLP5023 is located approximately 950m from the closest GP surgery, 'Dr Watts' in Wymondham, outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.
- 3.11.14 **Leisure Facilities:** The closest leisure centre to Site GNLP5023 is 'Wymondham Leisure Centre'. The majority of Site GNLP5023 is located within the 1.5km target distance to this leisure facility, and therefore a minor positive impact on the health and wellbeing of site end users would be expected.
- 3.11.15 **Main Road:** Site GNLP5023 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.
- 3.11.16 **Green Network:** Site GNLP5023 is located within 600m from the PRow network and public greenspace. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

## SA9: Crime

- 3.11.17 See **Table 2.4**, 'SA9: Crime'.

## SA10: Education

- 3.11.18 **Primary/Secondary School:** Site GNLP5023 is located approximately 1km from the closest primary school, Browick Road Primary and Nursery School. The site is also located approximately 1.6km from the closest secondary school, Wymondham High Academy. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

## SA11: Economy

- 3.11.19 **Primary Employment Location:** Site GNLP5023 is located approximately 300m from Wymondham Business Park with many potential employment opportunities for site end users, including businesses 'Express Equine', 'Supreme Bathroom and Kitchen Centre' and 'Abbeygate Accident and Repair', in addition to those expected in Wymondham Town Centre. Therefore, a minor positive impact on the local economy would be expected.

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## SA12: Transport and Access to Services

- 3.11.20 **Bus Stop:** The majority of Site GNLP5023 is located outside the 400m target distance to a bus stop. The closest bus stops are found on London Road to the north west and provide regular services '13', '13A', '13B' and '805', including routes to Norwich and the surrounding area. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.
- 3.11.21 **Railway Station:** Site GNLP5023 is located within the target distance to Wymondham Railway Station. The proposed development at this site would be likely to have a minor positive impact on the access of site end users to rail services.
- 3.11.22 **Pedestrian Access:** Site GNLP5023 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.
- 3.11.23 **Road Network:** Site GNLP5023 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.

## SA13: Historic Environment

- 3.11.24 **Grade II Listed Building:** Site GNLP5023 is located approximately 310m from the Grade II Listed Building 'Ivy Green Villa'. Due to this distance and intervening development (Wymondham Business Park), and the expected small number of pitches at this site, it is not anticipated that it would affect the setting of this Listed Building. Therefore, the proposed development at this site would be expected to result in a negligible impact on the historic environment.

## SA14: Natural Resources, Waste and Contaminated Land

- 3.11.25 **Previously Developed Land:** Site GNLP5023 comprises 1.19ha of previously undeveloped land. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- 3.11.26 **ALC:** Site GNLP5023 is situated upon ALC Grade 2 land which represents 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.

## SA15: Water

- 3.11.27 **SPZ:** Site GNLP5023 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.

3.11.28 **Watercourse:** Site GNLP5023 is located adjacent to the Bays River. 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.

### 3.12 Site GNL P5024 – Land at Upgate Street, Carleton Rode

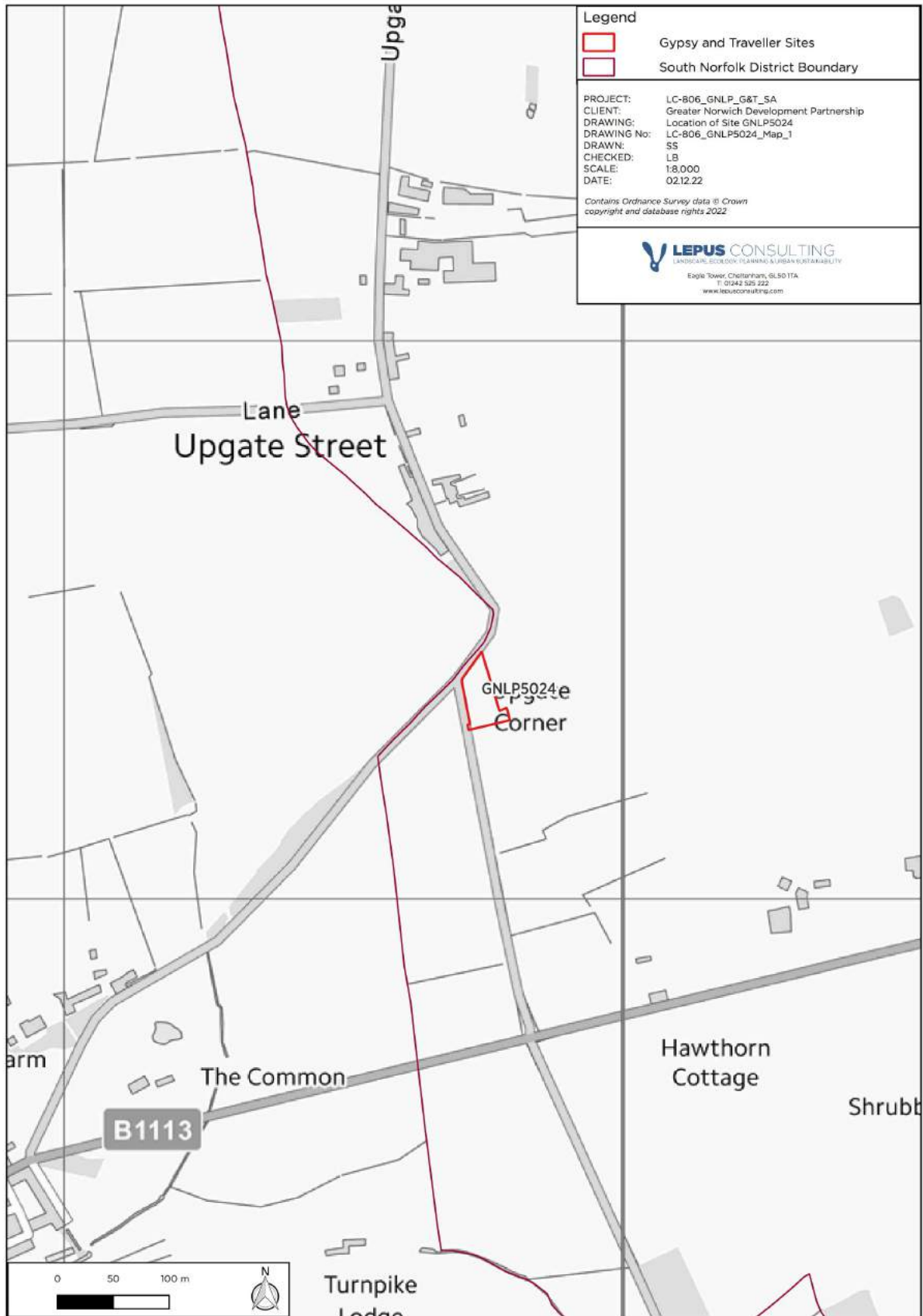


Figure 3.11: Location of proposed Gypsy and Traveller Site GNL P5024



**Site GNLP5024: Site information and overall scores per SA Objective (pre-mitigation)**

Site Name		Area (ha)		Proposed No. of Pitches										
Land at Upgate Street, Carleton Rode		0.62		4										
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	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
0	-	-	0	+	-	0	--	0	--	-	-	0	-	-

**SA1: Air Quality and Noise**

3.12.1 **Air and Noise Pollution:** Site GNLP5024 is proposed for small-scale development (four Gypsy and Traveller pitches) and is situated away from major sources of air and noise pollution. A negligible impact on local air quality and noise would be expected.

**SA2: Climate Change Mitigation and Adaptation**

3.12.2 **Fluvial Flooding:** Site GNLP5024 is located wholly within Flood Zone 1. 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.

**SA3: Biodiversity, Geodiversity and Green Infrastructure**

3.12.3 **Habitats Sites:** Site GNLP5024 is located approximately 8.2km from ‘Norfolk Valley Fens’ SAC, 11.8km from ‘Waveney & Little Ouse Valley Fens’ SAC and ‘Redgrave & South Lopham Fens’ Ramsar site and 26km from ‘Broadland’ SPA/Ramsar and ‘The Broads’ SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites. This includes the potential for nutrient impacts related to wastewater discharge from new developments, which may contribute towards worsening of water quality of rivers or wetland habitats associated with the Broads SAC and Broadland SPA/Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds.

3.12.4 **SSSI IRZ:** Site GNLP5024 is located approximately 170m from 'New Buckenham Common' SSSI, with the south west of the site lying within an IRZ which states "*Any residential development of 10 or more houses outside existing settlements/urban areas*" should be consulted on with Natural England. The majority of the site is also located within a Nutrient Impact Area, 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*". A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.

3.12.5 **Priority Habitats:** The north of Site GNLP5024 coincides with approximately 0.08ha of traditional orchard priority habitat; although, aerial photography indicates that this habitat may have since been lost. In absence of site surveys to confirm the quality or extent of the priority habitat, and in line with the precautionary principle, the proposed development at this site could potentially result in the partial loss or degradation of this habitat. A minor negative impact on the overall presence of priority habitats in the Plan area could occur.

#### **SA4: Landscape**

3.12.6 **Landscape Character:** Site GNLP5024 is located within the LCA 'Ashwellthorpe Plateau Farmland'. Some key characteristics of this LCA include arable fields, panoramic views and linear settlements along roads. Due to the expected small-scale development (four Gypsy and Traveller pitches) situated within an existing Gypsy and Traveller site, it is not anticipated that development proposals would be discordant with this LCA. Therefore, a negligible impact on the landscape character would be expected.

#### **SA5: Housing**

3.12.7 **Provision of Pitches:** Site GNLP5024 is proposed for the development of four Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

#### **SA6: Population and Communities**

3.12.8 **Local Services:** The nearest local shop to Site GNLP5024 is Kings Stores in New Buckenham, located approximately 1.3km to the south west of the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

#### **SA7: Deprivation**

3.12.9 See **Table 2.4**, 'SA7: Deprivation'.

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## SA8: Health

- 3.12.10 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5024 is Norfolk and Norwich University Hospital, located approximately 17.7km from the site, outside the sustainable target distance. The proposed development at Site GNLP5024 could potentially restrict the access of site end users to this facility. Therefore, a minor negative impact on access to healthcare could be expected.
- 3.12.11 **GP Surgery:** Site GNLP5024 is located approximately 5.9km from the closest GP surgery, 'Dr Martin & Partners' in Attleborough, outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.
- 3.12.12 **Leisure Facilities:** The closest leisure centre to Site GNLP5024 is 'Long Stratton Leisure Centre', located approximately 9.7km from the site. Site GNLP5024 is located outside of 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.
- 3.12.13 **Main Road:** Site GNLP5024 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.
- 3.12.14 **Green Network:** Site GNLP5024 is located within 600m from the PRow network. Therefore, a minor positive impact would be expected at this site as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.
- 3.12.15 As Site GNLP5024 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.

## SA9: Crime

- 3.12.16 See **Table 2.4**, 'SA9: Crime'.

## SA10: Education

- 3.12.17 **Primary/Secondary School:** Site GNLP5024 is located approximately 2km from the closest primary school, Carleton Rode C of E VA Primary School. The site is also located approximately 3km from the closest secondary school, Old Buckenham High School. Therefore, as the site is located outside the sustainable target distance to both primary and secondary schools, a major negative impact on the access of site end users to education would be expected.

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### SA11: Economy

- 3.12.18 **Primary Employment Location:** Site GNLP5024 is located in a rural area, with the closest primary employment locations being the market town of Wymondham to the north, and Diss to the south, over 5km from the site and outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to employment.

### SA12: Transport and Access to Services

- 3.12.19 **Bus Stop:** Site GNLP5024 is located outside the target distance to a bus stop. The closest bus stops are located approximately 1.2km from the site along the B1113 in New Buckenham, which provide regular service '37A' from East Harling to Norwich City Centre. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.
- 3.12.20 **Railway Station:** Site GNLP5024 is located outside the target distance to a railway station, with the nearest being Attleborough Railway Station situated over 5km to the north west. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.
- 3.12.21 **Pedestrian Access:** Site GNLP5024 currently has poor access to the surrounding footpath network and therefore the proposed development at this site could potentially have a minor negative impact on local accessibility.
- 3.12.22 **Road Network:** Site GNLP5024 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.

### SA13: Historic Environment

- 3.12.23 **Grade II Listed Building:** Site GNLP5024 is located approximately 280m from the Grade II Listed Buildings 'South Farmhouse' and 'Plumtree Farmhouse'. Due to the intervening development between the site and these Listed Buildings, as well as the previously developed nature of the site with a small number of additional pitches proposed, it is not anticipated that it would affect the setting of this Listed Building. Therefore, the proposed development at this site would be expected to result in a negligible impact on the historic environment.
- 3.12.24 **Conservation Area:** Site GNLP5024 is located approximately 175m from 'New Buckenham' CA. Due to the previously developed nature of the site with a small number of additional pitches proposed, it is not anticipated that it would affect the setting of this CA. Therefore, the proposed development at this site would be expected to result in a negligible impact on the historic environment.

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### SA14: Natural Resources, Waste and Contaminated Land

- 3.12.25 **Previously Developed Land:** Site GNLP5024 is located upon 0.62ha of primarily previously developed land; however, the site also contains undeveloped areas. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- 3.12.26 **ALC:** Site GNLP5024 is situated upon ALC Grade 3 land which could potentially 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.

### SA15: Water

- 3.12.27 **SPZ:** Site GNLP5024 coincides with the catchment (Zone III) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.

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## 4 Assessment of site policies

### 4.1 Preface

- 4.1.1 The following sections of this chapter provide an appraisal of the 11 site policies which have been prepared by the GNLP alongside each of the proposed Gypsy and Traveller sites. Each of the policies appraised in this report have been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework is presented in its entirety in **Appendix A**.
- 4.1.2 Each appraisal includes a SA impact matrix that provides an indication of the nature and magnitude of effects. Assessment narratives follow the impact matrices for each site policy, within which the findings of the appraisal and the rationale for the recorded impacts are described.
- 4.1.3 The assessments of the site policies presented within **sections 4.2 to 4.12** have drawn on the relevant site assessment findings as presented in **Chapter 3**.

## 4.2 Site Policy GNLP5004

### Policy GNLP5004 – Land off Buxton Road, Cawston

**Land off Buxton Road, Cawston (0.12 Ha) is allocated for a permanent residential Gypsy and Travellers Site. The site will accommodate approximately 4 residential Gypsy and Traveller pitches.**

The development will address the following site-specific matters:

1. Access will be via Buxton Road. Any trees or hedgerow lost to form the access or visibility splay should be compensated for with new planting within the development.
2. Additional landscaping and hedges will be provided to enhance screening and to maintain the residential amenity of adjoining properties.
3. An archaeological assessment will be required prior to development.
4. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
5. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5004	0	+	-	0	+	-	0	--	0	--	+	-	0	-	0

- 4.2.1 Policy GNLP5004 sets out site-specific requirements for the development of Site GNLP5004. The policy seeks to ensure residential amenity of adjoining properties (i.e. those on Buxton Road) is maintained through the use of hedgerows and landscaping, and that new hedgerows replace those that may be lost through the development of access to the site. Additionally, development of the site must ensure prior appropriate archaeological investigations and pollution mitigation measures are undertaken.
- 4.2.2 Through seeking to screen the site from nearby properties using hedgerows and landscaping, the policy would help to provide privacy for existing local residents and conserve the surrounding landscape to some extent. Additionally, archaeological investigations prior to the development of the site would help to identify any below ground assets with potential cultural heritage value that have not yet been discovered.
- 4.2.3 Additionally, the proposed “*pollution mitigation measures*” owing to the site’s location within a groundwater SPZ could help to ensure appropriate drainage of water from the site, which could help to protect water quality. A negligible impact on water could be achieved (SA Objective 15).
- 4.2.4 As such, Site Policy GNLP5004 could potentially improve the performance of this site for SA Objective 15, compared to the identified impacts in the site assessment (see **Chapter 3**). Although Policy GNLP5004 would lead to further potential benefits, such as regarding biodiversity, landscape and historic environment (SA Objectives 3, 4 and 13), the site policy is unlikely to change the assessment scores for these objectives (outlined within **Chapter 3**).



4.2.5 It is recommended that Policy GNLP5004 provides further details regarding landscaping measures, for example ensuring new planting with species appropriate to the local area which could be used to enhance the site, as well as to ascertain whether archaeological investigations will include desk or field studies.

### 4.3 Site Policy GNLP5005

#### Policy GNLP5005 - Wymondham Recycling Centre, Strayground Lane, Wymondham

Land off Strayground Lane Wymondham (0.07 ha), currently the Wymondham Recycling Centre, is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 2 residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

1. Access will be via Strayground Lane using the existing vehicular access for the recycling centre.
2. Improvements should be made to the passing bays along Strayground Lane and an adequate visibility is required at the junction of Whartons Lane with London Road (the B1172).
3. A contaminated land assessment is required and any mitigation must be completed prior to development.
4. An ecological assessment must be carried out and any identified impacts on nearby sites mitigated.
5. Pollution mitigation measures are required as the site is within the catchment of groundwater source protection zone (III).
6. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5005	-	+	--	0	+	-	0	-	0	--	-	-	0	-	-

4.3.1 Policy GNLP5005 sets out site-specific requirements for the development of Site GNLP5005 which regard the provision of access to the site, as well as the various assessments to be undertaken prior to the development of the site.

4.3.2 The site policy seeks to prepare the development of the site through requiring a contaminated land assessment, which would help to ensure that site end users would not be exposed to harmful contaminants which may potentially be present at the site. Additionally, the proposed “*pollution mitigation measures*” could help to ensure appropriate drainage of water from the site, which could help to protect water quality. An ecological assessment of the site could help to further identify potential impacts and required mitigation related to the ‘Bays River Meadows North’ CWS and lowland fens priority habitat which both coincide with the site.

4.3.3 It is deemed that although Site Policy GNLP5005 would lead to potential benefits, such as regarding biodiversity, health and water (SA Objectives 3, 8 and 15), the site policy is unlikely to change the assessment scores for the site overall (outlined within **Chapter 3**).

4.3.4 It is recommended that Site Policy GNLG5005 provides specific wording in relation to the protection of the CWS and retention of priority habitat within the site, as well as protection of the Bays River from construction/end use related pollution.

#### 4.4 Site Policy GNLG5009

##### Policy GNLG5009 – Hockering Lane, Bawburgh

**Land off Hockering Lane Bawburgh (0.59 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 6 residential Gypsy and Traveller pitches.**

The development will address the following site-specific matters:

1. Access will be from Hockering Lane via a private road, therefore third-party rights of access will be required.
2. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
3. An archaeological assessment will be required prior to development.
4. Development will be designed to avoid impacts to and from the underground gas pipeline.
5. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (II).
6. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNL5009	0	+	-	-	+	-	0	-	0	-	+	-	-	-	-

4.4.1 Policy GNLG5009 sets out site-specific requirements for the development of Site GNLG5009 which includes provision of access to the site, design considerations and assessments to be undertaken prior to the development of the site.

4.4.2 The policy states that an ecological assessment will be carried out prior to the development of the site, to help inform any required mitigation measures in relation to protected species and nearby sites. This would be likely to help identify and conserve local biodiversity features.

4.4.3 The policy also requires an archaeological assessment prior to the development of the site, which would help to identify any below ground assets with potential cultural heritage value that have not yet been discovered.

4.4.4 Furthermore, as a Cadent gas pipeline crosses the site from east to west, Policy GNLG5009 requires this to be investigated further to ensure that the site can be developed safely and without adverse effects on the function of this pipeline.

4.4.5 Additionally, the proposed “*pollution mitigation measures*” owing to the site’s location within a groundwater SPZ could help to ensure appropriate drainage of water from the site, which could help to protect water quality.

4.4.6 Overall, although Site Policy GNLP5009 would lead to potential benefits, such as regarding biodiversity, the historic environment and water (SA Objectives 3, 13 and 15), the site policy is unlikely to change the assessment scores for the site overall (outlined within **Chapter 3**).

4.4.7 It is recommended that Policy GNLP5009 incorporates wording to protect or where possible enhance the trees and hedgerow surrounding the site, which would be likely to help conserve the landscape character and historic settings of nearby heritage assets in Bawburgh by ensuring the site is appropriately screened.

#### 4.5 Site Policy GNLP5014

##### Policy GNLP5014 – A47 North Burlingham Junction

**Land off A47 North Burlingham Junction is allocated as a 2.48 ha broad location for a residential Gypsy and Traveller site within which a 1 ha site will accommodate approximately 15 residential Gypsy and Traveller pitches.**

The development will address the following site-specific matters:

1. Access will be from the stopped-off road linking to the newly aligned B1140.
2. Noise and air quality investigations will be required, with provision of a layout and design that incorporates a landscape buffer to the nearby major roads and noise mitigation measures to protect residential amenity.
3. Landscaping and tree planting will be required to preserve the landscape character of the surrounding area and to protect views of non-designated heritage assets nearby.
4. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5014	0	+	+/-	0	+	-	0	--	0	--	+	-	0	-	0

4.5.1 Policy GNLP5014 sets out site-specific requirements for the development of Site GNLP5014 which includes provision of access to the site, design considerations regarding the adjacent main road, and landscaping to be undertaken for the development.

4.5.2 The policy requires noise and air quality investigations to be undertaken, and for the development to ensure “*provision of a layout and design that incorporates a landscape buffer to the nearby major roads and noise mitigation measures*”. Through careful design and layout, it is possible that this could mitigate adverse impacts on site end users associated with traffic along the adjacent A47 and proposed road improvements, leading to a negligible impact on air quality and noise (SA Objective 1). The proposed landscape buffer in combination with the required “*Landscaping and tree planting*” would also be likely to reduce adverse effects on the landscape character and help to protect residential amenity, with a negligible impact likely for SA Objective 4.

- 4.5.3 Furthermore, the policy sets out that the proposed landscape measures should seek to protect views of nearby non-designated heritage assets, with potential benefits in terms of cultural heritage.
- 4.5.4 Overall, Site Policy GNLP5014 could potentially improve the performance of this site for air quality and noise (SA Objective 1) and landscape (SA Objective 4), compared to the identified impacts in the site assessment (see **Chapter 3**). Although the policy would also lead to potential benefits in terms of health (SA Objective 8), and potentially climate change adaptation owing to the GI provisions (SA Objective 2), the site policy is unlikely to change the assessment scores for the site overall for these objectives, as outlined within **Chapter 3**.
- 4.5.5 The site is relatively isolated in location and performs poorly in terms of access to healthcare, schools and other services. It is recommended that Policy GNLP5014 seeks to improve connections to and from the site, including sustainable transport options, to improve accessibility.

## 4.6 Site Policy GNLP5019

### Policy GNLP5019 – Woodland Stable, Shortthorn Road, Stratton Strawless

**Woodland Stable, Shortthorn Road, Stratton Strawless (0.33 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 8 additional residential Gypsy and Traveller pitches.**

The development will address the following site-specific matters:

1. Access should be via the existing access off Shortthorn Road that serves the Woodland Stables site.
2. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
3. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5019	0	-	-	0	+	-	0	--	0	--	+	--	0	-	0

- 4.6.1 Policy GNLP5019 sets out site-specific requirements for the development of Site GNLP5019 which includes provision of suitable access to the site via the neighbouring land uses, and assessments to be undertaken prior to the development.
- 4.6.2 The policy would be expected to ensure that appropriate road access to the site is provided, as the site is not currently connected to the existing road network.
- 4.6.3 The policy states that an ecological assessment will be carried out prior to the development of the site, to help inform any required mitigation measures in relation to protected species and nearby sites. This would be likely to help identify and conserve local biodiversity features.

4.6.4 It is deemed that although Site Policy GNLP5019 would lead to potential benefits, such as regarding biodiversity and accessibility (SA Objectives 3 and 12), the site policy is unlikely to change the assessment scores for the site overall (outlined within **Chapter 3**).

4.6.5 The site is relatively isolated in location and performs poorly in terms of access to healthcare, schools and other services. It is recommended that Policy GNLP5019 seeks to improve connections to and from the site, including sustainable transport options, to improve accessibility. Furthermore, the policy could be enhanced through seeking to retain as many of the existing trees on site as possible alongside the proposed development, or re-plant where removal is deemed necessary following ecological or arboricultural surveys.

## 4.7 Site Policy GNLP5020

### Policy GNLP5020 – Romany Meadow, The Turnpike, Carleton Rode

**Land off the B1113 (0.54 ha) at Romany Meadow, The Turnpike, Carleton Rode is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 6 additional residential Gypsy and Traveller pitches.**

The development will address the following site-specific matters:

1. Access should be via the existing access off The Turnpike that serves the Romany Meadow site.
2. A surface water flood risk assessment must be carried out with caravans and other structures positioned away from areas at surface water flood risk.
3. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
4. Landscaping and tree planting will be required to preserve the landscape character of the surrounding area and to protect views of nearby listed buildings.
5. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
6. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5020	0	0	-	0	+	-	0	--	0	--	-	-	0	-	0

4.7.1 Policy GNLP5020 sets out site-specific requirements for the development of Site GNLP5020 which includes provision of access to the site, landscaping measures, and assessments to be undertaken prior to the development.

4.7.2 The policy states that an ecological assessment will be carried out prior to the development of the site, to help inform any required mitigation measures in relation to protected species and nearby sites. This would be likely to help identify and conserve local biodiversity features.

- 4.7.3 The policy sets out the requirement for landscaping and tree planting alongside the proposed development, in order to help “*preserve the landscape character of the surrounding area and to protect views of nearby listed buildings*”. These measures would be likely to reduce the potential for adverse effects on the landscape character and help to protect residential amenity. Through seeking to preserve views of nearby heritage assets, the policy would also lead to potential benefits in terms of cultural heritage.
- 4.7.4 The policy also requires a surface water flood risk assessment which may help to ensure that site end users are protected from adverse effects associated with surface water flooding, and that the development does not exacerbate surface water flood risk elsewhere. A negligible impact on climate change adaptation could therefore be expected (SA Objective 2).
- 4.7.5 Additionally, the proposed “*pollution mitigation measures*” owing to the site’s location within a groundwater SPZ could help to ensure appropriate drainage of water from the site, which could help to protect water quality. A negligible impact on water could be achieved (SA Objective 15).
- 4.7.6 As such, Site Policy GNLP5020 could potentially improve the performance of this site for SA Objectives 2 and 15, compared to the identified impacts in the site assessment (see **Chapter 3**). It is deemed that although Site Policy GNLP5020 would lead to further potential benefits, such as regarding biodiversity, landscape and the historic environment (SA Objectives 3, 4 and 13), the site policy is unlikely to change the assessment scores for these objectives (outlined within **Chapter 3**).
- 4.7.7 The site is relatively isolated in location and performs poorly in terms of access to healthcare, schools and employment opportunities. It is recommended that Policy GNLP5020 seeks to improve connections to and from the site, including sustainable transport options, to improve accessibility.

## 4.8 Site Policy GNLP5021

### Policy GNLP5021 – Land off Holt Road, Horsford

**The Old Produce Shop, Holt Road, Horsford (0.9 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 6 additional residential Gypsy and Traveller pitches.**

The development will address the following site-specific matters:

1. Access should be via the existing access off Holt Road that serves the Old Produce Shop site.
2. Noise and air quality investigations are required, with provision of a layout and design that incorporates a landscape buffer to the nearby major roads and noise mitigation measures to protect residential amenity.
3. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
4. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5021	0	+	-	0	+	-	0	--	0	--	+	-	0	-	0

- 4.8.1 Policy GNLP5021 sets out site-specific requirements for the development of Site GNLP5021 which includes provision of access to the site as well as design and landscaping measures.
- 4.8.2 The policy requires noise and air quality investigations to be undertaken, and for the development to ensure “*provision of a layout and design that incorporates a landscape buffer to the nearby major roads and noise mitigation measures*”. Through careful design and layout, it is possible that this could mitigate adverse impacts on site end users associated with traffic along the adjacent A1270/A140 roundabout, leading to a negligible impact on air quality and noise (SA Objective 1). Depending on the design of the landscape buffer, these measures could also help to reduce the potential for adverse impacts on the surrounding landscape.
- 4.8.3 Additionally, the proposed “*pollution mitigation measures*” owing to the site’s location within a groundwater SPZ could help to ensure appropriate drainage of water from the site, which could help to protect water quality. A negligible impact on water could be achieved (SA Objective 15).
- 4.8.4 As such, Site Policy GNLP5021 could potentially improve the performance of this site for air quality and noise (SA Objective 1) and water (SA Objective 15), compared to the identified impacts in the site assessment (see **Chapter 3**). Although the policy would also lead to potential benefits in terms of landscape (SA Objective 4), the site policy is unlikely to change the assessment scores for the site overall for this objective.
- 4.8.5 The site is relatively isolated in location and performs poorly in terms of access to healthcare, schools and other services. It is recommended that Policy GNLP5021 seeks to improve connections to and from the site, including sustainable transport options, to improve accessibility.



## 4.9 Site Policy GNLP5022

### Policy GNLP5022 – Land off Reepham Road, The Oaks, Foulsham

**The Oaks off Reepham Road, is allocated for a residential Gypsy and Traveller site (3.3 ha). The site will accommodate approximately 5 additional residential Gypsy and Traveller pitches.**

The development will address the following site-specific matters:

1. Access will be via the existing access on Reepham Road. A highway safety assessment is required and an appropriate visibility splay must be achieved.
2. A surface water flood risk assessment must be carried out with caravans and other structures positioned away from areas at surface water flood risk.
3. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
4. Landscaping and tree planting will be required to preserve the landscape character of the surrounding area and to protect views of nearby listed buildings.
5. Development will be designed to avoid impacts to and from the underground gas pipeline.
6. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
7. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5022	0	0	-	0	+	-	0	--	0	--	+	-	0	-	0

4.9.1 Policy GNLP5022 sets out site-specific requirements for the development of Site GNLP5022 which includes provision of access to the site, design and landscaping measures, and assessments to be undertaken prior to the development.

4.9.2 The policy states that an ecological assessment will be carried out prior to the development of the site, to help inform any required mitigation measures in relation to protected species and nearby sites. This would be likely to help identify and conserve local biodiversity features.

4.9.3 The policy sets out the requirement for landscaping and tree planting alongside the proposed development, with the aim of helping to “*preserve the landscape character of the surrounding area and to protect views of nearby listed buildings*”. These measures would be likely to reduce the potential for adverse effects on the landscape character and help to protect residential amenity. Through seeking to preserve views of nearby heritage assets, which may include the Grade II Listed Building ‘The Old Hall’ and Grade II\* Listed Building ‘Church of St Andrew’ in Themelthorpe, the policy would also lead to potential benefits in terms of cultural heritage.

4.9.4 Furthermore, as the Bacton to Kings Lynn gas pipeline crosses the site from east to west, Policy GNLP5022 requires this to be investigated further to ensure that the site can be developed safely and without adverse effects on the function of this pipeline.

- 4.9.5 The policy also requires a surface water flood risk assessment which may help to ensure that site end users are protected from adverse effects associated with surface water flooding, and that the development does not exacerbate surface water flood risk elsewhere. A negligible impact on climate change adaptation could therefore be expected (SA Objective 2).
- 4.9.6 Additionally, the proposed “*pollution mitigation measures*” owing to the site’s location within a groundwater SPZ could help to ensure appropriate drainage of water from the site, which could help to protect water quality. A negligible impact on water could be achieved (SA Objective 15).
- 4.9.7 As such, Site Policy GNLP5022 could potentially improve the performance of this site for climate change adaptation (SA Objective 2) and water (SA Objective 15), compared to the identified impacts in the site assessment (see **Chapter 3**). It is deemed that although Site Policy GNLP5022 would lead to further potential benefits, such as regarding biodiversity, landscape and the historic environment (SA Objectives 3, 4 and 13), the site policy is unlikely to change the assessment scores for these objectives (outlined within **Chapter 3**).
- 4.9.8 The site is relatively isolated in location and performs poorly in terms of access to healthcare, schools and public transport infrastructure. It is recommended that Policy GNLP5022 seeks to improve connections to and from the site, including sustainable transport options, to improve accessibility.

#### 4.10 Site Policy GNLP5023

##### Policy GNLP5023 – Land off Strayground Lane, Wymondham

**Land at Strayground Lane, Wymondham (1.1 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 10 residential Gypsy and Traveller pitches.**

The development will address the following site-specific matters:

1. Access will be via Strayground Lane, using either the existing field access at the north-east corner of the site or a new access on the eastern boundary. If a new access is provided any loss of trees or hedgerows will be compensated for by new planting within the site.
2. Highway improvements will be required to the passing bays along Strayground Lane and an adequate visibility is required at the junction of Whartons Lane with London Road (the B1172).
3. As the land adjacent to the south west is in Flood Zones 2 and 3 a flood risk assessment maybe required, caravans and other structures shall be positioned away from this area.
4. A contaminated land assessment is required and any mitigation must be completed prior to development.
5. Screening will be required to the neighbouring paving company.
6. An ecological assessment must be carried out and any identified impacts on nearby sites mitigated.
7. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
8. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5023	-	+	-	-	+	-	0	-	0	--	+	-	0	-	-

- 4.10.1 Policy GNLP5023 sets out site-specific requirements for the development of Site GNLP5023 which includes provision of access to the site and various assessments to be undertaken prior to the development.
- 4.10.2 The site policy seeks to prepare the development of the site through requiring a contaminated land assessment, which would help to ensure that site end users would not be exposed to harmful contaminants which may potentially be present at the site. Additionally, the proposed “*pollution mitigation measures*” could help to ensure appropriate drainage of water from the site, which could help to protect water quality. An ecological assessment of the site could help to further identify potential impacts and required mitigation related to the ‘Bays River Meadows North’ CWS which is directly adjacent to the site.
- 4.10.3 Site GNLP5023 wholly coincides with lowland fens priority habitat. In line with the NPPF, local plans should “*promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity*”. As such, the loss or degradation of priority habitats should be avoided where possible. The proposed ecological assessment would be expected to help understand the quality and extent of the priority habitat and inform required mitigation or compensation measures. The policy also requires compensatory planting for any loss of trees required as a result of construction of access to the site, which would help to reduce adverse effects in this regard. Although, it is likely that the proposed development would result in some loss of the priority habitat.
- 4.10.4 The proposed compensatory planting, and policy provision that “*Screening will be required to the neighbouring paving company*” could help to reduce adverse effects on the surrounding landscape character, to some extent.
- 4.10.5 The policy also seeks to ensure that any flooding issues on site associated with the adjacent areas of Flood Zone 2 and 3 along the Bays River are addressed, where necessary. These provisions would be expected to benefit climate change adaptation (SA Objective 2).
- 4.10.6 On the whole, although Site Policy GNLP5023 would lead to potential benefits, such as regarding climate change adaptation, biodiversity, landscape, health and water (SA Objectives 2, 3, 4, 8 and 15), the site policy is unlikely to change the assessment scores for the site overall (outlined within **Chapter 3**).

4.10.7 It is recommended that Site Policy GNLP5023 provides specific wording in relation to the protection of the adjacent CWS and priority habitat within the site, as well as protection of the Bays River from construction/end use related pollution. The policy could also be enhanced through including more detailed requirements to consider landscaping measures to reduce potential for adverse effects on the surrounding landscape character.

#### 4.11 Site Policy GNLP5024

##### Policy GNLP5024 – Upgate Street, Carleton Rode

**Upgate Street, Carleton Rode (0.62 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 4 additional residential Gypsy and Traveller pitches.**

The development will address the following site-specific matters:

1. Access should be via the existing access off Upgate Street.
2. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
3. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
4. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5024	0	-	-	0	+	-	0	--	0	--	-	-	0	-	0

4.11.1 Policy GNLP5024 sets out site-specific requirements for the development of Site GNLP5024 which includes provision of access to the site and assessments to be undertaken prior to the development.

4.11.2 The policy states that an ecological assessment will be carried out prior to the development of the site, to help inform any required mitigation measures in relation to protected species and nearby sites. This would be likely to help identify and conserve local biodiversity features. The proposed ecological assessment would be expected to help understand the quality and extent of the traditional orchard priority habitat located in the north of the site, and inform required mitigation or compensation measures.

4.11.3 Additionally, the proposed “*pollution mitigation measures*” owing to the site’s location within a groundwater SPZ could help to ensure appropriate drainage of water from the site, which could help to protect water quality. A negligible impact on water could be achieved (SA Objective 15).

4.11.4 As such, Site Policy GNLG5024 could potentially improve the performance of this site for water (SA Objective 15), compared to the identified impacts in the site assessment (see **Chapter 3**). It is deemed that although Site Policy GNLG5024 would lead to further potential benefits, such as regarding biodiversity (SA Objective 3), the site policy is unlikely to change the assessment scores for this objective (outlined within **Chapter 3**).

4.11.5 Although the site is largely previously developed with low potential for adverse effects on environmentally focused objectives, it is relatively isolated in location and performs poorly in terms of access to healthcare, schools, employment and local services. It is recommended that Policy GNLG5024 seeks to improve connections to and from the site, including sustainable transport options, to improve accessibility.

#### 4.12 Site Policy GNLG5013 (Reasonable Alternative)

##### Policy GNLG5013 – Ketteringham Depot, Land west of Station Lane, Ketteringham

Land west of Station Lane, Ketteringham, (0.86 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 10 residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

1. Access should be via the existing access that currently serves the depot.
2. Investigation is required of the potential for the conversion of existing buildings, particularly at the frontage, as part of the redevelopment.
3. Noise and air quality investigations are required, and the layout and design of the site should include boundary treatments that protect residential amenity.
4. A contaminated land assessment is required and any mitigation must be completed prior to development.
5. An ecological survey is required due to the potential presence of protected species such as bats or barn owls in the existing buildings.
6. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
7. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Policy	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLG5013	0	+	-	+	+	-	0	-	0	--	-	-	0	+	0

4.12.1 Policy GNLG5013 sets out site-specific requirements for the development of Site GNLG5013 which includes provision of access to the site, design considerations regarding the existing buildings on site, and various assessments to be undertaken prior to the development. Although the site is not preferred by the Councils for allocation at this stage, it is considered to be a reasonable alternative and so the policy sets out the requirements for the site, should it come forward at a later date.

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- 4.12.2 The policy seeks to ensure that potential for redevelopment of buildings within the previously developed site is explored, and that the layout and design of the site seeks to protect residential amenity through boundary treatments. These requirements may help to improve the quality and character of the site and surroundings compared to the current nature of the site, and provide a more attractive frontage, potentially leading to a minor positive impact on landscape (SA Objective 4).
- 4.12.3 Owing to the presence of existing buildings on site, the policy states that an ecological survey will be required, to help inform any required mitigation measures in relation to protected species.
- 4.12.4 The policy requires a contaminated land survey to be carried out, to inform any necessary mitigation measures to make the site safe. Furthermore, “*noise and air quality investigations*” are required in addition to the proposed boundary treatments, which may help to reduce adverse effects on health and wellbeing experienced by site end users as a result of neighbouring site uses.
- 4.12.5 Additionally, the proposed “*pollution mitigation measures*” owing to the site’s location within a groundwater SPZ could help to ensure appropriate drainage of water from the site, which could help to protect water quality. A negligible impact on water could be achieved (SA Objective 15).
- 4.12.6 Overall, Site Policy GNLP5013 could potentially improve the performance of this site for landscape (SA Objective 4) and water (SA Objective 15), compared to the identified impacts in the site assessment (see **Chapter 3**). Although the policy would also lead to potential benefits in terms of air quality, noise, biodiversity, health and natural resources (SA Objectives 1, 3, 8 and 14), the site policy is unlikely to change the assessment scores for the site overall for these objectives, as outlined within **Chapter 3**.
- 4.12.7 Although the site is previously developed with low potential for adverse effects on environmentally focused objectives, it is relatively isolated in location and performs poorly in terms of access to healthcare, schools and other services. It is recommended that Policy GNLP5013 seeks to improve connections to and from the site, including sustainable transport options, to improve accessibility.

## 5 Mitigation and residual effects

### 5.1 Overview

- 5.1.1 The sustainability appraisal of the 11 reasonable alternative Gypsy and Traveller sites against baseline sustainability information has identified a number of adverse effects associated with the SA Objectives in the SA Framework (see **Appendix A**). The purpose of this chapter is to consider if and how these effects can be mitigated by applying the mitigation hierarchy.
- 5.1.2 The first stage of the mitigation hierarchy is to consider if the adverse effect can be avoided. This may be possible by withdrawing the potential site allocation.
- 5.1.3 For allocations which are likely to remain on the basis that the plan makers consider their inclusion to be necessary, mitigation measures should be explored to reduce the overall significance of effect. If it is not possible to mitigate identified adverse effects, these will remain as 'residual effects' at the end of the SA process.
- 5.1.4 One way to reduce adverse impacts identified against baseline receptors is to consider the potential mitigating effects of planning policies. **Tables 5.1 – 5.14** list the identified adverse impacts according to SA Objective, as discussed within **Chapter 3**, and list development management policies from lower tier plans (i.e. which have already been adopted) that might reasonably be expected to help mitigate identified adverse effects. The plans in question have been prepared by Broadland District Council<sup>50</sup> and South Norfolk Council<sup>51</sup>.
- 5.1.5 Site policies have been prepared for all reasonable alternative Gypsy and Traveller sites assessed within this report. Attributes of the proposed Gypsy and Traveller Site Policies, alongside other emerging GNLP Strategic Policies, could also potentially help to mitigate some of the negative impacts that have been identified as a result of some of the development proposals. These are discussed in **Chapter 4**.
- 5.1.6 Each table has three columns. Column one lists the adverse effects, column two lists relevant policies and the final column indicates the extent to which these policies would be expected to mitigate each identified adverse effect.
- 5.1.7 It is important to demonstrate the amount of mitigation that may be required to ensure a site can optimise sustainability performance. The level of intervention that may be required to facilitate effective mitigation varies and can help determine the eventual choice of preferred option in the plan. Sites which require low levels of intervention are likely to be preferable to sites that require complex and potentially unviable strategies.

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<sup>50</sup> Broadland District Council (2015) Development Management DPD. Available at: [https://www.broadland.gov.uk/downloads/file/1118/development\\_management\\_dpd\\_adopted](https://www.broadland.gov.uk/downloads/file/1118/development_management_dpd_adopted) [Date accessed: 22/04/22]

<sup>51</sup> South Norfolk Council (2015) South Norfolk Local Plan, Development Management Policies Document. Available at: <https://www.south-norfolk.gov.uk/residents/planning/planning-policy/adopted-south-norfolk-local-plan/development-management-policies> [Date accessed: 22/04/22]



## 5.2 SA Objective 1 – Air Quality and Noise

5.2.1 **Table 5.1** presents the identified adverse impacts on air quality and noise and the likely impacts post-mitigation.

*Table 5.1: Identified adverse impacts and potential mitigation for SA Objective 1 - Air Quality and Noise*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>Exposure to air and noise pollution from main roads</b>	GNLP Policy 2 seeks to protect air quality and minimise pollution, which includes the provision of electric vehicle infrastructure.  Policies EN4 (Broadland) and DM3.14 (South Norfolk) seek to ensure that development proposals do not result in an unacceptable impact on air quality or noise pollution.  Policy DM3.3 (South Norfolk) seeks to ensure that proposals for new Gypsy and Traveller sites are not approved where there are unsafe localised pollution levels.	These policies would not be expected to fully mitigate the impacts of transport associated emissions from new development on health for development proposals located in close proximity to main roads.
<b>Exposure to noise pollution and vibrations from railway lines</b>	Not addressed within GNLP strategic policies or district DM policies.	These policies would not be anticipated to mitigate potential adverse impacts on noise pollution and vibrations at development proposals located in close proximity to railway lines.

## 5.3 SA Objective 2 – Climate Change Mitigation and Adaptation

5.3.1 **Table 5.2** presents the identified adverse impacts on climate change mitigation and adaptation, and the likely impacts post-mitigation.

*Table 5.2: Identified adverse impacts and potential mitigation for SA Objective 2 – Climate Change Mitigation and Adaptation*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>Risk of surface water flooding</b>	GNLP Policy 2 would be anticipated to mitigate the risk of surface water flooding that may arise as a result of development, through the requirement for development to incorporate sustainable drainage measures and contribute to the green infrastructure cover.  Policies CSU5, EN1, EN3 (Broadland), DM1.4, DM4.2 and DM4.4 (South Norfolk) would be expected to ensure development proposals alleviate the risk of surface water flooding.  Policy DM3.3 (South Norfolk) would ensure that Gypsy and Traveller sites include the provision of satisfactory foul and surface drainage.	Overall, these policies would be expected to mitigate the risk of surface water flooding and would seek to prevent the exacerbation of surface water flood risk in surrounding areas.

## 5.4 SA Objective 3 – Biodiversity, Geodiversity and Green Infrastructure

5.4.1 **Table 5.3** presents the identified adverse impacts on biodiversity, geodiversity and green infrastructure and the likely impacts post-mitigation.

*Table 5.3: Identified adverse impacts and potential mitigation for SA Objective 3 – Biodiversity, Geodiversity and Green Infrastructure*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>Threats or pressures to Habitats sites (SAC, SPA, Ramsar sites)</b>	<p>GNLP Policy 3 seeks to address impacts of visitor pressure caused by residents of new development on Habitats sites. The policy would be expected to ensure that developments provide, or provide funding for, significantly higher amounts of appropriate amenity green infrastructure to protect Habitats sites identified within the HRA.</p> <p>Policies EN1, EN3 (Broadland), DM1.4, DM3.8, DM4.2 and DM4.4 (South Norfolk) could potentially help to safeguard and enhance biodiversity including at internationally designated sites.</p> <p>Policy DM3.3 (South Norfolk) would ensure that Gypsy and Traveller developments are not permitted where sites designated at international or national levels will be unacceptably harmed.</p>	<p>These policies alone would not be expected to mitigate potential adverse impacts on Habitats sites.</p> <p>The emerging HRA found that, subject to satisfactory policy modification with respect to nutrient neutrality, the Gypsy and Traveller sites will have no adverse effect upon the integrity of Habitats sites alone or in combination. As this policy wording has not yet been finalised, the impacts on these Habitats sites remain uncertain for the purpose of this SA report at the time of writing.</p>
<b>Threats or pressures to SSSIs</b>	<p>GNLP Policy 2 would seek to ensure that development proposals contribute towards green infrastructure network, and GNLP Policy 3 aims to ensure development does not result in harm to designated assets of the natural environment.</p> <p>Policies EN1, EN3 (Broadland), DM1.4, DM3.8, DM4.2 and DM4.4 (South Norfolk) could potentially help to safeguard and enhance biodiversity including at SSSIs.</p> <p>Policy DM3.3 (South Norfolk) would ensure that Gypsy and Traveller developments are not permitted where sites designated at national levels will be unacceptably harmed.</p>	<p>At the time of writing, it is uncertain whether the policies would be expected to mitigate potential adverse impacts on SSSIs associated with Nutrient Impact Zones.</p>
<b>Threats or pressures to other designated and non-designated biodiversity sites and habitats (CWS and Priority Habitats)</b>	<p>GNLP Policy 2 would contribute towards the protection and enhancement of the green infrastructure network.</p> <p>GNLP Policy 3 aims to conserve and enhance the natural environment, including priority habitats, networks and species, ancient trees and woodlands, geodiversity, avoid harm to designated or non-designated assets and ensure development proposals result in biodiversity net gain.</p> <p>Policies EN1, EN3 (Broadland), DM1.4, DM3.8, DM4.2 and DM4.4 (South Norfolk) could potentially help to safeguard and enhance biodiversity including at designated and non-designated biodiversity sites.</p>	<p>These policies would be expected to mitigate adverse impacts of development proposals on designated and non-designated biodiversity assets.</p> <p>There is some uncertainty regarding the mitigation potential at Site GNLP5023 which wholly coincides with lowland fens priority habitat. Site surveys are</p>

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
	Policy DM3.3 (South Norfolk) would ensure that Gypsy and Traveller developments are not permitted where sites designated at national or county levels will be unacceptably harmed.	recommended to assess the quality and extent of this habitat and inform any required site-specific mitigation, further to the policies listed in this table.

## 5.5 SA Objective 4 – Landscape

5.5.1 **Table 5.4** presents the identified adverse impacts on landscape and the likely impacts post-mitigation.

*Table 5.4: Identified adverse impacts and potential mitigation for SA Objective 4 - Landscape*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>Threaten or result in the loss of rural and locally distinctive landscape character</b>	<p>GNLP Policies 2 and 3 would be expected to contribute towards mitigating negative impacts associated with development on Greater Norwich’s locally distinctive landscape character and seek to conserve and enhance the special qualities of the built, historic and natural environment.</p> <p>Policies EN2, GC4 (Broadland), DM1.4, DM2.1, DM2.3, DM2.6, DM2.7, DM2.8, DM2.9, DM3.3, DM3.4, DM3.5, DM3.8, DM3.9, DM4.5, DM4.6 and DM4.9 (South Norfolk) seek to protect and enhance the local landscape character and distinctiveness of the surrounding environment.</p> <p>Policy DM3.3 (South Norfolk) sets out various criteria to help ensure that proposed Gypsy and Traveller sites integrate with existing settlements and do not have significant adverse impacts on the local landscape.</p>	These policies would be anticipated to mitigate adverse impacts on the landscape character at all potential development sites.
<b>Change in views experienced by existing local residents</b>	<p>GNLP Policies 2 and 3 would be expected to mitigate impacts on views experienced by local residents, to some extent, through ensuring that development takes account of the setting and character of the local area.</p> <p>Policies EN2, GC4 (Broadland), DM2.8, DM3.8 and DM4.6 (South Norfolk) would be expected to protect visual amenity and ensure development proposals incorporate designs which enhance appearance and retain important views.</p> <p>Policy DM3.3 (South Norfolk) would be expected to ensure that Gypsy and Traveller development is sited and designed to integrate into the local landscape including screening by vegetation or landform, and that development has regard to the amenity of nearby properties.</p>	These policies would be expected to mitigate the impact of development on views experienced by local residents.
<b>Increase risk of urbanisation</b>	GNLP Policy 3 seeks to conserve and enhance the natural environment, by ensuring that new development is located and designed to enhance local character and sense of place, taking account of local design guidance. GNLP Policy 2 would be	These policies may help to reduce some of the negative impacts associated with transition of new

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>of the countryside</b>	<p>expected to help reduce the likelihood of urbanisation of the countryside and coalescence by maintaining strategic gaps.</p> <p>Policies EN2 (Broadland) and DM4.7 (South Norfolk) seek to protect strategic gaps between settlements.</p> <p>Policies GC4 (Broadland), DM1.3, DM3.13, DM4.4 and DM4.6 (South Norfolk) would be expected to ensure that new development is of an appropriate scale and form to retain the character of the surrounding area.</p> <p>Policy DM3.3 (South Norfolk) seeks to ensure that the scale of Gypsy and Traveller sites does not dominate the nearest settled community.</p>	<p>development into the countryside.</p> <p>However, due to the rural and undeveloped context in which affected proposed Gypsy and Traveller sites are situated, the policies would not be expected to fully mitigate these impacts.</p>

## 5.6 SA Objective 5 – Housing

5.6.1 No adverse impacts on housing anticipated.

## 5.7 SA Objective 6 – Population and Communities

5.7.1 **Table 5.5** presents the identified adverse impacts on population and communities and the likely impacts post-mitigation.

*Table 5.5: Identified adverse impacts and potential mitigation for SA Objective 6 – Population and Communities*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>Limited access to local services and facilities</b>	<p>GNLP Policy 2 seeks to provide safe and sustainable access to on-site and local services including schools, healthcare, shops, leisure/community facilities and libraries. This policy also would be expected to help promote inclusive and safe communities, through providing access to these services and opportunities for social interaction.</p> <p>GNLP Policy 4 would be expected to provide transport improvements including improved bus, cycling and walking networks through the Transport for Norwich Strategy.</p> <p>Policies CSU2, CSU3, R1 (Broadland), DM1.2, DM2.4, DM2.5 and DM3.16 (South Norfolk) seek to protect existing community facilities from loss and encourage the development of new shops and facilities in local centres.</p> <p>Policies DM3.3 (South Norfolk) and H6 (Broadland) would be expected to ensure future residents of the proposed Gypsy and Traveller sites are not overly isolated from settlements and can access facilities to meet their daily needs.</p>	<p>These policies would be expected to mitigate the adverse impact on restricted access to local services and facilities and would help to promote community cohesion.</p>

## 5.8 SA Objective 7 – Deprivation

- 5.8.1 The SA process has not identified any significant adverse impacts on deprivation as a result of the development of reasonable alternative sites. However, measures outlined in policies could potentially enhance the sustainability performance under this objective (see **Table 5.6**).

*Table 5.6: Identified adverse impacts and potential mitigation for SA Objective 7 – Deprivation*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>No significant adverse impacts on deprivation anticipated</b>	<p>GNLP Policy 2 promotes the development of inclusive, resilient and safe communities.</p> <p>Policy GC4 (Broadland) seeks to create sustainable, inclusive and mixed communities, and Policy DM3.8 (South Norfolk) promotes inclusive design.</p> <p>Policies DM3.3 (South Norfolk) and H6 (Broadland) seek to ensure that Gypsy and Traveller sites are not overly isolated from existing settlements and Policy DM3.3 promotes integration with the surrounding community.</p>	<p>These policies would be anticipated to have a minor positive impact on deprivation across Greater Norwich.</p>

## 5.9 SA Objective 8 – Health

- 5.9.1 **Table 5.7** presents the identified adverse impacts on health and the likely impacts post-mitigation.

*Table 5.7: Identified adverse impacts and potential mitigation for SA Objective 8 – Health*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>Limited access to NHS hospital</b>	<p>GNLP Policy 2 would be expected to ensure that development provides safe and sustainable access to existing healthcare facilities.</p> <p>GNLP Policy 4 seeks to deliver improvements to healthcare infrastructure and improved public transport, which could potentially improve site end users’ access to NHS hospitals.</p> <p>Policies TS1, TS2, CG4, H5 (Broadland), DM3.8 and DM3.10 (South Norfolk) would be expected to improve connections to public transport and incorporate travel plans where required. These policies could potentially provide improved bus links to NHS hospitals.</p>	<p>These policies would not be expected to fully mitigate the existing restricted access to these services, especially in terms of providing sustainable connections for rural areas of Greater Norwich to NHS hospitals.</p>
<b>Limited access to GP surgery</b>	<p>GNLP Policy 2 would be expected to ensure that development provides safe and sustainable access to existing healthcare facilities.</p> <p>GNLP Policy 4 seeks to deliver improvements to healthcare infrastructure and improved public transport, which could potentially improve site end users’ access to GP surgeries.</p> <p>Policies CSU2, CSU3 (Broadland), DM1.2 and DM3.16 (South Norfolk) seek to ensure community facilities including healthcare are provided and avoid the loss of existing facilities.</p>	<p>The policies would be likely to reduce adverse effects associated with access to GP surgeries for Sites GNLP5005 and GNLP5023 (in Wymondham).</p> <p>These policies would not be expected to fully mitigate the restricted access to GP surgeries for the other sites in the smaller, more rural</p>

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>Policies TS1, TS2, CG4, H5 (Broadland), DM3.8 and DM3.10 (South Norfolk) would be expected to improve connections to public transport and incorporate travel plans where required. These policies could potentially provide improved bus links to healthcare facilities.</p> <p>Policies DM3.3 (South Norfolk) and H6 (Broadland) would be expected to ensure future residents of the proposed Gypsy and Traveller sites are not overly isolated from settlements and can access facilities to meet their daily needs, which could potentially include GP surgeries.</p>	<p>settlements in South Norfolk and Broadland.</p>
<b>Limited access to leisure facilities and services</b>	<p>GNLP Policies 2 and 4 would be expected to improve access to existing leisure services through provision of safe and sustainable transport links.</p> <p>GNLP Policy 6 seeks to promote leisure industries including through the green infrastructure network, sustainable tourism initiatives, and additional leisure facility provision in Norwich city centre outlined in GNLP Policy 7.1.</p> <p>GNLP Policy 3 would be expected to provide additional opportunities for leisure and recreation through the provision of amenity green infrastructure.</p> <p>Policy RL1 (Broadland), DM2.4, DM2.5, DM2.9 and DM3.15 (South Norfolk) would be expected to provide recreational space and support the development of leisure proposals in appropriate locations.</p> <p>Policies TS1, TS2, CG4, H5 (Broadland), DM3.8 and DM3.10 (South Norfolk) would be expected to improve connections to public transport and incorporate travel plans where required. These policies could potentially provide improved bus links to leisure facilities.</p>	<p>These policies would not be expected to fully mitigate the existing restricted access to these services as all sites, except Site GNLP5005, are located in rural areas, or significantly outside the sustainable target distance to leisure facilities.</p>
<b>Exposure to air pollution from main road</b>	<p>GNLP Policy 2 seeks to protect air quality, which includes the provision of electric vehicle infrastructure.</p> <p>Policy EN4 (Broadland) and DM3.14 (South Norfolk) seek to ensure that development proposals do not result in an unacceptable impact on air quality or noise pollution.</p> <p>Policy DM3.3 (South Norfolk) seeks to ensure that proposals for new Gypsy and Traveller sites are not approved where there are unsafe localised pollution levels.</p>	<p>These policies would not be expected to fully mitigate the impacts of transport associated emissions from new development on health for development proposals located in close proximity to main roads.</p>
<b>Limited access to public greenspace</b>	<p>GNLP Policy 2 seeks to ensure that all development contributes towards multi-functional green infrastructure links.</p> <p>GNLP Policy 3 would be expected to ensure that developments provide, or provide funding for, significantly higher amounts of appropriate amenity green infrastructure to protect Habitats sites identified within the HRA.</p> <p>Policies EN2, EN3, RL1 (Broadland), DM1.2, DM1.4, DM3.15, DM4.4 (South Norfolk), DM2, DM3, DM8, DM26 and DM33</p>	<p>These policies would be expected to mitigate the limited access to public greenspace and community open spaces.</p>



Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
	(Norwich) would help to ensure that all residential development proposals have good access to outdoor space, and that development would avoid the loss of existing open spaces.	

## 5.10 SA Objective 9 – Crime

5.10.1 The SA process has not identified any significant adverse impacts on crime as a result of the development of reasonable alternative sites. However, measures outlined in policies could potentially enhance the sustainability performance under this objective (see **Table 5.8**).

*Table 5.8: Identified adverse impacts and potential mitigation for SA Objective 9 - Crime*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>No significant adverse impacts on deprivation anticipated</b>	GNLP Policy 2 promotes the development of inclusive, resilient and safe communities.  Policies GC4 (Broadland), DM3.8 and DM4.9 (South Norfolk) seek to create safe environments by using designs which address crime prevention and the safety of communities.	These policies would be anticipated to have a minor positive impact on crime across Greater Norwich.

## 5.11 SA Objective 10 – Education

5.11.1 **Table 5.9** presents the identified adverse impacts on education and the likely impacts post-mitigation.

*Table 5.9: Identified adverse impacts and potential mitigation for SA Objective 10 - Education*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>Limited access to primary schools</b>	GNLP Policy 7.1 would support the development of a new primary school in Norwich and would be expected to ensure school capacity is increased throughout the Plan area in order to meet the identified needs.  GNLP Policy 2 would be expected to provide improved safe and sustainable access to local schools across the Plan area.  GNLP Policy 7.4 seeks to ensure that safe routes to schools are provided in rural communities, and along with GNLP Policy 7.5, seeks to ensure that any windfall development will be limited by the capacity of local primary schools.  Policies CSU2, CSU3 (Broadland) and DM3.16 (South Norfolk) would also be expected to encourage the siting of new residential development in areas with good access to primary education, and the provision of new community facilities which could potentially include new primary schools.	These policies would be expected to improve access to primary schools, to some extent. However, detail about new primary schools and the capacity of existing primary schools is unknown. Until further detail is available, adverse impacts on sustainable access to primary education cannot be ruled out, particularly for development in rural settlements in Broadland and South Norfolk. Therefore, these policies would not be expected to fully mitigate this impact at this stage of the Plan preparation.



Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>Policy DM3.3 seeks to ensure Gypsy and Traveller sites are located in areas with convenient access to schools, and seeks to ensure that consideration is given to the capacity of local infrastructure and that measures are put in place to address any lack of capacity.</p>	
<p><b>Limited access to secondary schools</b></p>	<p>GNLP Policy 4 provides a new high school in the North East growth area and would be expected to ensure school capacity is increased throughout the Plan area in order to meet the identified needs.</p> <p>GNLP Policy 2 would be expected to provide improved safe and sustainable access to local schools across the Plan area, and GNLP Policy 7.4 seeks to ensure that safe routes to schools are provided in rural communities.</p> <p>Policy CSU3 (Broadland) would be expected to help ensure development proposals have good access to secondary education.</p> <p>Policies TS1, TS2, CG4, H5 (Broadland), DM3.8 and DM3.10 (South Norfolk) would be expected to improve connections to public transport and incorporate travel plans where required. These policies could potentially provide improved bus links to secondary schools.</p> <p>GNLP Policy 4 would also be expected to improve access to higher education, through the implementation of a cross valley bus link between University of East Anglia and Norwich Research Park.</p> <p>Policy DM3.3 seeks to ensure Gypsy and Traveller sites are located in areas with convenient access to schools, and seeks to ensure that consideration is given to the capacity of local infrastructure and that measures are put in place to address any lack of capacity.</p>	<p>These policies would be expected to mitigate poor access to secondary schools through delivering a new secondary school in Norwich and improving public transport across the Plan area.</p>

## 5.12 SA Objective 11 – Economy

5.12.1 **Table 5.10** presents the identified adverse impacts on the economy and the likely impacts post-mitigation.

*Table 5.10: Identified adverse impacts and potential mitigation for SA Objective 11 - Economy*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>Net loss of employment floorspace</b>	<p>GNLP Policy 6 seeks to improve employment opportunities across the Plan area in order to meet the identified need. It would be anticipated that this would mitigate any loss of employment floorspace as a result of residential development proposed with the GNLP, through the retention of a range of existing small and medium scale employment sites and encouraging provision of small-scale business opportunities in residential and commercial developments.</p> <p>GNLP Policy 2 could help to provide opportunities for working at home through allowing the delivery of broadband and fibre optic networks.</p> <p>Policies E1, E2, H4 (Broadland), DM2.1, DM2.2 and DM2.3 (South Norfolk) would be expected to ensure that existing employment sites are protected and that new employment opportunities are provided in line with local needs, including the promotion of home working.</p>	<p>These policies would be expected to ensure that any loss of active employment floorspace would be mitigated.</p>
<b>Limited access to primary employment location</b>	<p>GNLP Policy 4 would be expected to provide improved safe accessibility and infrastructure links to key employment areas including the Cambridge Norwich Tech Corridor and town centres and promote the growth of Norwich International Airport.</p> <p>GNLP Policy 6 seeks to meet the identified employment need and provide a range of small, medium and start-up business opportunities, as well as encourage the provision of local working opportunities within new and existing developments.</p> <p>Policy DM2.1 (South Norfolk) would be anticipated to ensure accessible employment opportunities are provided alongside new development. Furthermore, through seeking to encourage home working (Policy H4 in Broadland and DM2.3 in South Norfolk) this would contribute towards a reduced need to travel to work.</p>	<p>Overall, these policies would be expected to mitigate restricted access to employment opportunities throughout the Plan area.</p>

## 5.13 SA Objective 12 – Transport and Access to Services

5.13.1 **Table 5.11** presents the identified adverse impacts on transport and access to services and the likely impacts post-mitigation.

*Table 5.11: Identified adverse impacts and potential mitigation for SA Objective 12 – Transport and Access to Services*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>Limited access to bus stops</b>	<p>GNLP Policy 4 would be expected to improve access to bus stops through the implementation of the Transport for Norwich Strategy, including improvements to the bus network, developing the Park and Ride system, and providing a new cross valley bus link to the University of East Anglia.</p> <p>Policies TS1, TS2, CG4, H5 (Broadland), DM3.8 and DM3.10 (South Norfolk) would be expected to improve connections to public transport and incorporate travel plans where required.</p>	<p>These policies would be expected to mitigate restricted access to bus services and ensure that all residents have adequate public transport accessibility.</p>
<b>Limited access to train stations</b>	<p>GNLP Policy 4 promotes the enhancement of rail services, including improved journey times to London and Cambridge, and the East-West Rail Link. Improved bus links could potentially provide better connections to railway stations.</p> <p>Policies TS1, TS2, CG4, H5 (Broadland), DM3.8 and DM3.10 (South Norfolk) would be expected to improve connections to public transport and incorporate travel plans where required.</p>	<p>These policies would be expected to improve access to railway stations for development proposals within or in the outskirts of settlements which contain an existing railway station.</p> <p>However, these policies would not be anticipated to fully mitigate the restricted access to railway stations for the remaining sites, in the smaller, more rural settlements in Broadland and South Norfolk.</p>
<b>Lack of safe pedestrian access / access to road network</b>	<p>GNLP Policy 2 promotes safe and sustainable access to on-site and local services and facilities, and GNLP Policy 4 would be expected to improve the cycling and walking network, within the Transport for Norwich Strategy.</p> <p>Policies TS2, TS3, TS6 (Broadland), DM1.2, DM3.8, DM3.10 and DM3.11 (South Norfolk) would be likely to provide safe pedestrian access for all new development and promote highway safety and accessibility.</p> <p>Policy DM3.3 (South Norfolk) would ensure that proposed Gypsy and Traveller sites meet suitable access requirements to the site.</p>	<p>These policies would be expected to mitigate adverse impacts on accessibility, as they would provide improved access to the road, PRoW and cycle networks and facilitate pedestrian access to local facilities.</p>

## 5.14 SA Objective 13 – Historic Environment

5.14.1 **Table 5.12** presents the identified adverse impacts on the historic environment and the likely impacts post-mitigation.

*Table 5.12: Identified adverse impacts and potential mitigation for SA Objective 13 – Historic Environment*

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Alteration of character or setting of a Listed Building</b></p>	<p>GNLP Policy 3 seeks to ensure that development proposals do not result in harm to designated and non-designated heritage assets or their historic character and continued or new uses are provided for heritage assets which retain their historic significance. GNLP Policy 2 would be expected to ensure that landscaping measures are incorporated within new developments which consider local characteristics and enhance local landscape, including that of heritage assets.</p> <p>Policies EN2, GC4 (Broadland), DM1.4, DM2.10 and DM4.10 (South Norfolk) would also be expected to ensure that heritage assets including Listed Buildings and their settings are preserved and enhanced in line with their significance. These policies would also help to ensure that development proposals have regard to the character and appearance of the surrounding historic environment within Conservation Areas.</p> <p>Policy DM3.3 (South Norfolk) would help to ensure that proposed developments for Gypsy and Traveller sites do not have a significant impact on heritage assets and their settings and promotes good screening using vegetation and/or landform.</p>	<p>These policies would be expected to mitigate negative impacts on the character and setting of Grade I, Grade II* and Grade II Listed Buildings.</p>

## 5.15 SA Objective 14 – Natural Resources, Waste and Contaminated Land

5.15.1 **Table 5.13** presents the identified adverse impacts on natural resources, waste and contaminated land and the likely impacts post-mitigation.

**Table 5.13:** Identified adverse impacts and potential mitigation for SA Objective 14 – Natural Resources, Waste and Contaminated Land

Identified adverse impact	Potential mitigating influence of GNLP strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
<b>Loss of greenfield sites, land with an ecological or landscape value</b>	GNLP Policy 2 promotes resource efficiency, and GNLP Policy 3 seeks to protect high quality agricultural land. Policies GC4 (Broadland, DM1.4 and DM3.3 (South Norfolk) seek to encourage the efficient use of land and environmental resources, including prioritising development on previously developed land. Policy DM3.3 (South Norfolk) states that there is a preference for Gypsy and Traveller sites located on previously developed land or previously occupied agricultural yards and hard-standings.	All proposed sites for development of Gypsy and Traveller pitches in Greater Norwich, other than GNLP5013, comprise (wholly or partially) previously undeveloped land. These policies would not be expected to fully mitigate the loss of greenfield land.
<b>Loss of best and most versatile soils</b>	GNLP Policy 2 promotes resource efficiency, and GNLP Policy 3 seeks to protect high quality agricultural land. Policies DM2.8, DM2.9 and DM2.12 (South Norfolk) seek to ensure that high quality agricultural land is protected.	These policies would not be expected to mitigate the loss of ALC Grades 1, 2 and 3 land (potential BMV land) in Greater Norwich.

## 5.16 SA Objective 15 – Water

5.16.1 **Table 5.14** presents the identified adverse impacts on water and the likely impacts post-mitigation.

*Table 5.14: Identified adverse impacts and potential mitigation for SA Objective 15 - Water*

Identified adverse impact	Potential mitigating influence of GNLG strategic policies and adopted Local Plan DM policies	Commentary: Will the policies mitigate the identified adverse effects?
<p><b>Risk of contamination of groundwater Source Protection Zones</b></p>	<p>GNLG Policy 2 seeks to protect water quality and support a catchment approach to water management, including the use of sustainable drainage in order to meet high water efficiency requirements.</p> <p>GNLG Policy 3 seeks to conserve and enhance the natural environments, including increasing the provision of green infrastructure, which could potentially help to protect the quality of groundwater.</p> <p>Policies EN4, CSU5 (Broadland) and DM3.14 (South Norfolk), would be expected to ensure that all new developments include sustainable drainage, and that groundwater quality and aquifers are protected from pollution.</p> <p>Policy DM3.3 (South Norfolk) would ensure that Gypsy and Traveller sites include the provision of satisfactory foul and surface drainage, water supply and utilities.</p>	<p>Together, these policies would be expected to mitigate negative impacts associated with development on nearby groundwater SPZs.</p>
<p><b>Risk of contamination of watercourses</b></p>	<p>GNLG Policy 2 seeks to protect water quality and support a catchment approach to water management, including the use of sustainable drainage in order to meet high water efficiency requirements.</p> <p>GNLG Policy 3 seeks to conserve and enhance the natural environments, including increasing the provision of green infrastructure, which could potentially help to protect the quality of watercourses, and reduce the likelihood of pollutants entering watercourses.</p> <p>Policy 7.1 seeks to ensure development near the River Wensum is in accordance with the River Wensum Strategy which would be expected to prevent the worsening of water quality at this river.</p> <p>Policies EN1, EN4, CSU5 (Broadland) and DM1.4, DM2.9, DM3.14, DM4.2 (South Norfolk) would be anticipated to ensure that development proposals do not result in a deterioration of water quality.</p> <p>Policy DM3.3 (South Norfolk) would ensure that Gypsy and Traveller sites include the provision of satisfactory foul and surface drainage, water supply and utilities.</p>	<p>These policies would not be expected to fully mitigate the potential adverse impacts on the contamination of some watercourses.</p>

## 5.17 Post-mitigation site assessments

5.17.1 Following careful consideration of the mitigating effects of the GNLP strategic policies, Gypsy and Traveller site policies and adopted Local Plan DM policies on the assessment findings, the post-mitigation assessment findings for the 11 reasonable alternative Gypsy and Traveller sites considered in this report have been presented in **Table 5.15**.

5.17.2 The post-mitigation impacts indicate the optimal sustainability performance of each Gypsy and Traveller site, based on information available at the time of writing.

**Table 5.15:** Post-mitigation impacts of each site identified in the SA Report

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	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5004	0	+	+/-	0	+	0	+	--	+	-	0	-	0	-	0
GNLP5005	-	+	+/-	0	+	+	+	-	+	-	+	+	0	-	-
GNLP5013	0	+	+/-	+	+	0	+	-	+	-	+	-	0	+	0
GNLP5014	0	+	+/-	0	+	0	+	--	+	-	+	+	0	-	0
GNLP5019	0	+	+/-	0	+	0	+	--	+	-	+	-	0	-	0
GNLP5020	0	+	+/-	0	+	0	+	--	+	-	0	-	0	-	0
GNLP5021	0	+	+/-	0	+	+	+	--	+	-	+	-	0	-	0
GNLP5022	0	+	+/-	0	+	0	+	--	+	-	+	-	0	-	0
GNLP5023	-	+	+/-	-	+	0	+	-	+	-	+	0	0	-	-
GNLP5024	0	+	+/-	0	+	0	+	--	+	-	0	-	0	-	0

5.17.3 All 11 reasonable alternative Gypsy and Traveller sites have been identified as resulting in negative impacts on some SA Objectives, although the majority of these are considered to be minor.

5.17.4 The best performing option could be identified as Site GNLP5013, because after the potential mitigating influence of the GNLP policies is taken into account, no major negative scores are identified, and positive scores are identified overall for seven of the 15 SA Objectives. However, the assessment of this site has also identified the potential for minor negative impacts across five SA Objectives. Site GNLP5005 also performs relatively well, with positive scores for seven SA Objectives but five minor negative scores.



- 5.17.5 A major negative impact has been identified for Sites GNLP5004, GNLP5014, GNLP5019, GNLP5020, GNLP5021, GNLP5022 and GNLP5024 under SA Objective 8, owing to the rural location of these sites, outside of sustainable target distances to healthcare facilities. Sites GNLP5014 and GNLP5021 could be identified as the worst performing out of the sites, as they both have one major negative impact and four minor negative impacts identified post-mitigation; although, the majority of SA Objectives have been identified as negligible or minor positive for these sites.
- 5.17.6 There is a degree of uncertainty regarding the impacts of all sites on biodiversity (SA Objective 3) owing to the emerging mitigation strategy regarding nutrient neutrality issues within Norfolk. Site GNLP5023 wholly coincides with priority habitat, and as such, there is also uncertainty regarding the potential to mitigate the proposed development at this location.

## 5.18 Recommendations

- 5.18.1 The proposed site allocation policies currently provide an overview of requirements to be taken into account upon development of each site. Recommendations to improve the site policies have been presented within the assessment text for each policy in **Chapter 4**.

## 6 Preferred Options

### 6.1 Reasonable alternatives

- 6.1.1 The SEA Regulations require that the SEA process considers “*reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme*” (Regulation 12) and gives “*an outline of the reasons for selecting the alternatives dealt with*” (Schedule 2).
- 6.1.2 The SEA process must record how reasonable alternatives were identified, described, and evaluated. The plan makers must identify all reasonable alternatives, providing an explanation as to their provenance and qualities that qualify them as reasonable.
- 6.1.3 The findings of the SEA can help with refining and further developing these options in an iterative and on-going way. The SEA findings do not form the sole basis for decision-making; other studies, the feasibility of the option and consultation feedback will also contribute to the decision of identifying a preferred option.

### 6.2 Site identification and screening

- 6.2.1 GNLP’s identification of reasonable alternative sites for Gypsy and Traveller sites has been carried out through a ‘Call for Sites’ exercise in 2016 and various Regulation 18 consultations carried out during the plan making process. However, prior to submitting the GNLP for independent examination in July 2021 no Gypsy and Traveller sites had been submitted for consideration.
- 6.2.2 Since the GNLP has been at examination work has been ongoing to identify Gypsy and Traveller sites. Discussions have taken place with various public and private landowners, as well as contacting the Gypsy and Traveller community directly. The result is that 11 reasonable alternative sites are identified, which are proposed by landowners who indicate a commitment to delivering them, and as such, these 11 sites have been considered in the SA process.
- 6.2.3 Three further sites were submitted in autumn 2021 via a public consultation for the South Norfolk Village Clusters Housing Allocations Plan (VCHAP) but they are considered unreasonable and are outside the scope of this SA process. These being sites previously dismissed on appeal for Gypsy and Traveller sites.

### 6.3 Selection and rejection of reasonable alternative sites

- 6.3.1 Following consideration of the SA information, in addition to other evidence base documents, ten Gypsy and Traveller sites are preferred for allocation in the emerging GNLP. One site is proposed as a reasonable alternative but is not preferred for allocation at this stage.
- 6.3.2 **Table 6.1** presents an outline of the reasons for selecting each of the sites, provided by the Councils, in accordance with the requirements of the SEA Regulations.

**Table 6.1: Reasons for selection of each reasonable alternative Gypsy and Traveller site**

Site Reference & Name	Selected/rejected	Outline reason (provided by the Councils)
GNLP5004 – Land off Buxton Road, Eastgate	<b>Selected</b>	This is a greenfield site which could provide 4 pitches for Gypsies and Travellers and does not have any major constraints to make the site unsuitable for development, therefore subject to achieving an acceptable visibility splay and undertaking site investigations as per the findings of the site assessment process GNLP5004 is considered suitable for allocation, subject to public consultation and further assessment.
GNLP5005 - Wymondham Recycling Centre, Strayground Lane	<b>Selected</b>	This site is a brownfield site currently used as Wymondham recycling centre. The landowner intends to close this facility, and thus an opportunity exists to redevelop it for 2 residential Gypsy and Traveller pitches, therefore subject to achieving mitigation measures with respect to water quality and possible contamination as per the findings of the site assessment process GNLP5005 is considered suitable for allocation, subject to public consultation and further assessment.
GNLP5013 – Ketteringham Recycling Centre (revised area)	<b>Selected – Reasonable Alternative</b>	This site is currently a depot facility but the landowner proposes to relocate, meaning the land could come forward as a Gypsy and Traveller site for 10 pitches. Due to this situation the deliverability of GNLP5013 is less certain and there are the constraints of the site itself. It is less accessible by walking and cycling because it is separated by the A11 from the nearest services and facilities in Hethersett, and there could be issues of contamination due to previous uses of the land. These factors mean GNLP5013 is a less favoured site but it could still be suitable to allocate, especially if other favoured site are withdrawn. GNLP5013 merits consultation and is selected as a reasonable alternative for further public consultation.
GNLP5014 – Land adjacent to A47	<b>Selected</b>	This is a newly proposed piece of land that is currently in agricultural use. Upon the dualling of the A47 and construction of a new junction with the B1140 (South Walsham Road) this land will be surplus for farming and the landowner is willing to bring forward a new Gypsy and Traveller site for 15 pitches. The site has some constraints, which are to do with its proximity to the A47, but issues to do with noise, air quality, and landscaping appear to be mitigatable. Subject to the A47 road improvement scheme going ahead, public consultation and further assessment, GNLP5014 appears suitable for allocation.
GNLP5019 – Land at Woodland Stable, Shortthorn Road, Stratton Strawless	<b>Selected</b>	This site currently comprises 9 pitches and a community building. The proposal is to submit a revised scheme for 8 pitches on an area of land that has been granted permission for 4 pitches. The proposal would expand the site to a total of 17 pitches. While somewhat remote from services, this is an existing Gypsy and Traveller site which the owners would be likely to progress quickly.
GNLP5020 – Land at Romany Meadow, The Turnpike, Carleton Rode	<b>Selected</b>	This site currently comprises 6 pitches and the proposal is to expand on adjacent land to provide up to an additional 6 pitches. The site is not without constraints, which includes no walking route to services and facilities, but its allocation could be suitable subject to achieving mitigation measures and further public consultation. If approved, the Romany Meadow site would grow to a total of 12 pitches.
GNLP5021 – The Old Produce Shop, Holt Road, Horsford	<b>Selected</b>	This is an existing Gypsy and Traveller site for 1 pitch and the landowner wants to expand by adding a further 6 pitches. The land was previously a shop selling fruit and vegetables but has been a private Gypsy and

Site Reference & Name	Selected/ rejected	Outline reason (provided by the Councils)
		<p>Traveller site for nearly 10 years. The site already has a suitable access to the Holt Road, and since the site's original permission the Holt Road has been stopped-off to through traffic, following the construction of the A1270 Broadland Northway. Whilst disconnected from the nearest facilities in Horsford there are no constraints that would rule out adding further pitches development. Subject to public consultation and further assessment, GNLP5021 appears suitable for allocation and new pitches could be delivered within 5 years.</p>
<p>GNLP5022 – The Oaks, Foulsham</p>	<p><b>Selected</b></p>	<p>This site currently has 2 pitches and Broadland District Council is discussing regularising all the development on the site with the landowner. The landowner wants to expand the site by 5 pitches, bringing the total number of pitches to 7. The site is not without constraints, which includes no walking route to services and facilities, limitations on the access and surrounding road network, the presence of a gas pipeline, and some surface water flood risk on a part of the land. Development would need to be in the northern part of the site, as the gas pipeline runs east to west below the central part of the site. Despite these matters development potential is not ruled out, and so subject to achieving mitigation measures and public consultation, its allocation is suitable and additional pitches could come forward quickly over the next 1-3 years.</p>
<p>GNLP5023 – Strayground Lane, Wymondham</p>	<p><b>Selected</b></p>	<p>This is a newly proposed piece of land south of the Wymondham Recycling Centre, on Strayground Lane, for 10 pitches. Considerations for the site are highways constraints along Strayground Lane, the proximity to the Bays River Meadow County Wildlife Site, the possibility of contaminated land from the former landfill site, and neighbouring land uses. Subject to achieving mitigation measures for these constraints GNLP5023 is considered suitable for allocation, subject to public consultation and further assessment. 10 pitches is considered to be appropriate given the highway constraints posed by the narrowness of Strayground Lane and Whartons Lane and delivery would be likely to need to be delayed until after the waste and recycling centre has closed.</p>
<p>GNLP5024 – Ugate Street, Carleton Rode</p>	<p><b>Selected</b></p>	<p>This is an existing Gypsy and Traveller which currently comprises 2 pitches and the proposal is to expand within the current curtilage of the site by 4 pitches to grow the site to a total of 6 pitches. Considerations of the site includes the site access, that there is no walking route to services and facilities, there is a nearby SSSI and county wildlife site, and the site is adjacent to the Bunns Bank linear earthwork which elsewhere in its course is a Scheduled Monument. Nevertheless, these issues appear to be mitigatable and if allocated additional pitches would be deliverable within 5 years.</p>

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## 6.4 Reasonable alternative policies

- 6.4.1 The Councils have identified GNLP5013 as a reasonable alternative. Site GNLP5013 at Ketteringham is not part of the favoured approach, due to concerns over accessibility and integrations with neighbouring uses, although potential remains for this site. There are constraints to do with the site becoming vacant, due to the existing depot facility that operates from there, and also because there are constraints to do with access to services, and the possibility of contaminated land on site.
- 6.4.2 Each of the proposed site policies within the 'Site Policies for Gypsy and Traveller Permanent Residential Pitches Focused Consultation' document are deemed necessary in order to ensure that the identified need is addressed in the most sustainable way and that sites are deliverable, with policy criteria to address site-specific requirements. The Councils believe that a 'do nothing' approach for assessing these proposed site policies would not reflect the objective evidence.

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# 7 Next steps

## 7.1 Consultation

- 7.1.1 This SA Report is subject to a six-week focused consultation alongside the GNLP 'Site Policies for Gypsy and Traveller Permanent Residential Pitches Focused Consultation' document, the Gypsy and Traveller Site Assessment Booklet, HELAA Addendum and the HRA.
- 7.1.2 Following the consultation period, responses will be considered by the Councils to inform the emerging GNLP as the examination stage progresses.

## Appendix A: SA Framework

Theme	Over-arching Objective	Decision making criteria for site allocations and general polices	Suggested indicators
<b>Air Quality and Noise (ref: SA1)</b>	Minimise air, noise and light pollution to improve wellbeing.	<ul style="list-style-type: none"> <li>Will it have a significant impact on AQMAs in Norwich city central and Hoveton?</li> <li>Will it minimise impact on air quality?</li> <li>Will it minimise the impact of light and noise pollution?</li> </ul>	<ul style="list-style-type: none"> <li>Concentration of selected air pollutants:                             <ol style="list-style-type: none"> <li>NO<sub>2</sub></li> <li>PM<sub>10</sub> (particulate matter)</li> </ol> </li> </ul>
<b>Climate Change Mitigation and Adaptation (ref: SA2)</b>	Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change.	<ul style="list-style-type: none"> <li>Will it minimise CO<sub>2</sub> emissions?</li> <li>Will it support decentralised and renewable energy generation?</li> <li>Will it minimise the risk of fluvial or surface water flooding?</li> </ul>	<ul style="list-style-type: none"> <li>CO<sub>2</sub> emissions per capita</li> <li>Sustainable and renewable energy capacity permitted by type</li> <li>Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence or water quality grounds</li> </ul>
<b>Biodiversity, Geodiversity and Green Infrastructure (ref: SA3)</b>	Protect and enhance the area's biodiversity and geodiversity assets and expand the provision of green infrastructure.	<ul style="list-style-type: none"> <li>Will it minimise impact on designated sites and important species and habitats?</li> <li>Could it provide opportunities for bio- or geo-diversity enhancement?</li> <li>Could it contribute to green infrastructure networks?</li> <li>Will it help minimise the impact on air quality at designated sites?</li> <li>Will it ensure that current ecological networks are not compromised and future improvements in habitat connectivity are not prejudiced?</li> </ul>	<ul style="list-style-type: none"> <li>Net change in Local Sites in "Positive Conservation Management"</li> <li>Percentage of SSSIs in:                             <ol style="list-style-type: none"> <li>favourable condition;</li> <li>unfavourable recovering;</li> <li>unfavourable no change;</li> <li>unfavourable declining; or</li> <li>destroyed/ part destroyed.</li> </ol> </li> <li>Number of Planning Approvals granted contrary to the advice of Natural England or Norfolk Wildlife Trust (on behalf of the County Wildlife Partnership) or the Broads Authority on the basis of adverse impact on site of acknowledged biodiversity importance.</li> </ul>
<b>Landscape (ref: SA4)</b>	Promote efficient use of land, while respecting the variety of landscape types in the area.	<ul style="list-style-type: none"> <li>Will it minimise impact on the landscape character of the area, including the setting of the Broads?</li> <li>Will it enable development of previously developed land?</li> <li>Will it make efficient use of land?</li> </ul>	<ul style="list-style-type: none"> <li>Percentage of new and converted dwellings on Previously Developed Land</li> <li>Number of Planning Approvals granted contrary to the advice of the Broads Authority on the basis of adverse impact on the Broads Landscape</li> </ul>



Theme	Over-arching Objective	Decision making criteria for site allocations and general policies	Suggested indicators
<b>Housing (ref: SA5)</b>	Ensure that everyone has good quality housing of the right size and tenure to meet their needs.	<ul style="list-style-type: none"> <li>Will it ensure delivery of housing to meet needs in appropriate locations?</li> <li>Will it deliver affordable housing and other tenures to meet needs?</li> <li>Will it ensure a variety in the size and design of dwellings, to meet a range of circumstances and needs?</li> </ul>	<ul style="list-style-type: none"> <li>Net housing completions</li> <li>Affordable housing completions</li> <li>House completions by bedroom number, based on the proportions set out in the most recent Sub-regional Housing Market Assessment</li> <li>Starter Homes completions</li> </ul>
<b>Population and Communities (ref: SA6)</b>	Maintain and improve the quality of life of residents.	<ul style="list-style-type: none"> <li>Will it enhance existing, or provide new community facilities?</li> <li>Will promote integration with existing communities?</li> </ul>	<ul style="list-style-type: none"> <li>Distance and accessibility to key services and amenities</li> <li>Hectares of accessible open space per 1,000 population</li> </ul>
<b>Deprivation (ref: SA7)</b>	To reduce deprivation.	<ul style="list-style-type: none"> <li>Will it help to reduce deprivation?</li> </ul>	<ul style="list-style-type: none"> <li>Indices of Multiple Deprivation/Lower Super Output Areas</li> <li>Health indicators</li> </ul>
<b>Health (ref: SA8)</b>	To promote access to health facilities and promote healthy lifestyles.	<ul style="list-style-type: none"> <li>Will it maximise access to health services, taking into account the needs of an ageing population?</li> <li>Will it promote healthy lifestyles?</li> <li>Will it avoid impact on the quality and extent of existing assets, such as formal and informal footpaths?</li> </ul>	<ul style="list-style-type: none"> <li>Total hectares of accessible public open space (cumulative) provided as a consequence of a planning condition, S106 obligation or CIL investment within the plan period</li> <li>Percentage of physically active adults</li> <li>Access to health facilities</li> <li>Local air quality</li> </ul>
<b>Crime (ref: SA9)</b>	To reduce crime and the fear of crime.	<ul style="list-style-type: none"> <li>Will it help design out crime from new development?</li> </ul>	<ul style="list-style-type: none"> <li>Indices of Multiple Deprivation/Lower Super Output Areas</li> <li>Rates of crime</li> </ul>
<b>Education (ref: SA10)</b>	To improve skills and education.	<ul style="list-style-type: none"> <li>Will it enable access to education and skills training?</li> </ul>	<ul style="list-style-type: none"> <li>Local educational attainment levels</li> <li>Proximity to primary and secondary schools</li> <li>Capacity of primary and secondary schools</li> <li>Access to higher education opportunities</li> </ul>
<b>Economy (ref: SA11)</b>	Encourage economic development covering a range of sectors and skill levels to improve employment opportunities for residents and maintain and enhance town centres.	<ul style="list-style-type: none"> <li>Will it promote Greater Norwich as a regional economic centre?</li> <li>Will it promote employment land provision to support existing and future growth sectors?</li> </ul>	<ul style="list-style-type: none"> <li>Amount of land developed for employment by type</li> <li>Annual count of jobs by BRES across the Plan area</li> <li>Employment rate of economically active population</li> <li>Percentage of workforce employed in higher occupations</li> </ul>

Theme	Over-arching Objective	Decision making criteria for site allocations and general policies	Suggested indicators
		<ul style="list-style-type: none"> <li>Will it promote a range of employment opportunities?</li> <li>Will it promote vibrant town centres?</li> <li>Will it promote the rural economy?</li> </ul>	
<b>Transport and Access to Services (ref: SA12)</b>	Reduce the need to travel and promote the use of sustainable transport modes.	<ul style="list-style-type: none"> <li>Does it reduce the need to travel?</li> <li>Does it promote sustainable transport use?</li> <li>Does it promote access to local services?</li> <li>Does it promote road safety?</li> <li>Does it promote strategic access to and within the area?</li> </ul>	<ul style="list-style-type: none"> <li>Percentage of residents who travel to work: <ul style="list-style-type: none"> <li>a) By private motor vehicle;</li> <li>b) By public transport;</li> <li>c) By foot or cycle; or</li> <li>d) Work at, or mainly at, home.</li> </ul> </li> <li>IMD Access to services and housing</li> </ul>
<b>Historic Environment (ref: SA13)</b>	Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment.	<ul style="list-style-type: none"> <li>Does it enable the protection and enhancement of heritage assets, including their setting?</li> <li>Does it provide opportunities to reveal and conserve archaeological assets?</li> <li>Could it benefit heritage assets currently 'at risk'?</li> </ul>	<ul style="list-style-type: none"> <li>Percentage of Conservation Areas with appraisals</li> <li>Heritage at risk – number and percentage of <ul style="list-style-type: none"> <li>a) Listed buildings; and</li> <li>b) Scheduled Ancient Monuments.</li> </ul> </li> </ul> <p>on Heritage at Risk register</p>
<b>Natural Resources, Waste and Contaminated Land (ref: SA14)</b>	<p>Minimise waste generation, promote recycling and avoid the sterilisation of mineral resources.</p> <p>Remediate contaminated land and minimise the use of the best and most versatile agricultural land.</p>	<ul style="list-style-type: none"> <li>Does it contribute to the minimisation of waste production and to recycling?</li> <li>Does it safeguard existing and planned mineral and waste operations?</li> <li>Will it help to remediate contaminated land?</li> <li>Does it avoid loss of the best and most versatile agricultural land (grades 1-3a)?</li> <li>Will there be adequate provision for waste and recycling facilities?</li> </ul>	<ul style="list-style-type: none"> <li>Number of planning permissions granted on non-allocated sites on class 1, 2 or 3a agricultural land</li> <li>Percentage of land allocated for development, or subject to an extant planning permission of 5 or more dwellings that is identified as Grade 1 or 2 agricultural land value.</li> <li>Minerals and waste indicators and targets should be informed by the outputs of the adopted Minerals and Waste Plans for Norfolk.</li> </ul>
<b>Water (ref: SA15)</b>	Maintain and enhance water quality and ensure the most efficient use of water.	<ul style="list-style-type: none"> <li>Will it maximise water efficiency?</li> <li>Will it minimise impact on water quality?</li> <li>Will it impact on water discharges that affect designated sites?</li> <li>Will it contribute to achieving the River Basin Management Plan actions and objectives?</li> </ul>	<ul style="list-style-type: none"> <li>Water efficiency in new homes</li> <li>See also flood section (Number of planning permissions contrary to the advice of the Environment Agency on either flood defence or water quality grounds)</li> </ul>



Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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