

# Strategic Environmental Assessment (SEA) for the Diss and District Neighbourhood Plan

**Environmental Report Addendum: Focused consultation report  
on major modifications to the draft Regulation 14 plan**

March 2022

## Quality information

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## Revision History

<b>Revision</b>	<b>Revision date</b>	<b>Details</b>	<b>Name</b>	<b>Position</b>
V1	March 2022	Draft for internal review	Cheryl Beattie	Principal Environmental Planner
V2	March 2022	Draft for QB review	Eric Taylor	DDNP Steering Group
V3	March 2022	Final for consultation	Cheryl Beattie	Principal Environmental Planner

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# Non-Technical Summary

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Diss and District Neighbourhood Plan (DDNP). SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the DDNP is a legal requirement.<sup>1</sup>

An SEA Environmental Report (June 2021) was produced and consulted on alongside the draft 'pre-submission' DDNP over the period Wednesday 23<sup>rd</sup> June to Wednesday 4<sup>th</sup> August 2021. Since consultation, major modifications to the draft 'pre-submission' DDNP have been made. Such modifications necessitate a re-run of Regulation 14 consultation.

This report is an SEA Addendum providing a focused assessment of the major modifications proposed for the DDNP and is being consulted on alongside the DDNP Major Modifications Consultation Document, through a re-run of the Regulation 14 consultation. It does not seek to repeat assessments that have already been undertaken but takes a concise approach to understanding and assessing the major modifications being proposed and consulted on.

Given this approach, it is recognised that it is beneficial to read this report in conjunction with the June 2021 Environmental Report to understand the wider context and other implications of the Plan, outside of the major modifications being proposed.

This consultation report is structured to provide an update to each 'part' of the Environmental Report, and the assessment process is structured by the SEA framework (see Chapter 2) which was established in early development of the SEA.

The major modifications being proposed and the context changes since the previous consultation can be summarised as:

- The DDNP decision as to whether existing unbuilt allocation sites from the adopted South Norfolk Local Plan will continue to be allocated in the DDNP to meet future housing needs (with decision-making devolved by the Local Plan process). This effectively increases the level of growth to be planned for through the DDNP, with existing allocation sites to be rolled over no longer automatically counting towards the overall need for 763 homes in Diss over the period 2018 - 2038. Instead of identifying sites to meet a minimum of 250 homes over this period, the DDNP now needs to plan for a minimum of 381 homes in Diss over this period.
- The Babergh and Mid Suffolk JLP is no longer likely to allocate sites in Brome and Oakley at this stage of planning, instead pushing back the allocation of sites to the preparation of a Part 2 of the JLP. The DDNP is therefore faced with choices in terms of growth at Brome and Oakley and recognise that a Local Plan Part 2 is also likely to revisit the settlement hierarchy which may have implications for Palgrave and Stuston as well as Brome and Oakley.

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<sup>1</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The DDNP was screened in as requiring SEA by Collective Community Planning in 2020.

- An amended spatial strategy has been proposed which responds to the changes in the strategic context, and new or amended sites have been considered through an updated evidence base.
- New policies have been introduced relating to 'Waveney Quarter', Diss Business Park, surface water management, and Local Green Spaces.

Most of the sites being revisited at this stage are existing sites (some with minor boundary amendments or new evidence submitted) which have been subject to SEA. One new site is identified and assessed, the findings for which are presented in Appendix A. No further alternatives assessment is deemed necessary at this stage.

The major modifications to the plan have been assessed as a whole against the SEA framework in Chapter 4 and the summary findings of this work are as follows:

*“Overall, there is no significant departure from the conclusions of the previous Environmental Report, with only enhanced positive effects anticipated in relation to health and wellbeing (particularly as a result of outlining an appropriate relocation site for the leisure centre in Diss). The removal of site allocation DDNP12 (Land north of the B1118) at Brome and Oakley will also avoid any loss of priority habitats in this location and avoid minor negative effects in this respect.*

*Three of the previous four recommendations have been incorporated into the plan update at this stage, with an appropriate relocation site identified for the leisure centre in Diss, the removal of DDNP12 and avoidance of loss of priority habitat, and additional policy provisions supporting development that realises any potential opportunities to improve drainage and surface water run-off (new Policy 7).*

*The one outstanding recommendation relates to the potential for the DDNP to support a higher sustainability standard in major development proposals in Diss where it has recommended that policy provisions seek more from proposals at site allocation DDNP01. The viability of additional policy measures are currently being explored by the Steering Group, and further minor policy amendments in this respect may be included within the submission Plan.”*

In terms of next steps, following consultation, both the DDNP and SEA will be finalised for submission to South Norfolk and Mid Suffolk District Councils and independent examination will be scheduled.

# 1. Introduction

- 1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Diss and District Neighbourhood Plan (DDNP).
- 1.2 The DDNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the local plans of South Norfolk District Council and Mid Suffolk District Council. Once 'made' the DDNP will have material weight when deciding on planning applications, alongside the relevant local plans.
- 1.3 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the DDNP is a legal requirement.<sup>2</sup>

## SEA explained

- 1.4 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on SEA.
- 1.5 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft Plan that "*identifies, describes and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*".<sup>3</sup> The report must be considered, alongside consultation responses, when finalising the plan.
- 1.6 More specifically, the Environmental Report is structured to answer the following three questions:
  1. What has plan-making/ SEA involved up to this point?
    - Including in relation to 'reasonable alternatives'.
  2. What are the SEA findings at this stage?
    - i.e., in relation to the draft plan
  3. What happens next?

## This consultation report

- 1.7 In line with the Regulations outlined above, an SEA Environmental Report (June 2021) was produced and consulted on alongside the draft 'pre-submission' DDNP over the period Wednesday 23<sup>rd</sup> June to Wednesday 4<sup>th</sup> August 2021.

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<sup>2</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The DDNP was screened in as requiring SEA by Collective Community Planning in 2020.

<sup>3</sup> v

- 1.8 Since consultation, major modifications to the draft 'pre-submission' DDNP have been made. Such modifications necessitate a re-run of Regulation 14 consultation.
- 1.9 This report is a focused assessment of the major modifications proposed for the DDNP and is being consulted on alongside the DDNP Major Modifications Consultation Document, through a re-run of the Regulation 14 consultation. It does not seek to repeat assessments that have already been undertaken but takes a concise approach to understanding and assessing the major modifications being proposed and consulted on. It follows the same structure as the previous SEA Environmental Report, as outlined under para 1.6, with the report essentially answering questions 1, 2 and 3 in turn but focusing on the key changes being made or new choices emerging.
- 1.10 Given this approach, it is recognised that it is beneficial to read this report in conjunction with the June 2021 Environmental Report to understand the wider context and other implications of the Plan, outside of the major modifications being proposed.
- 1.11 Responses received during consultation will be considered when finalising the DDNP and SEA Environmental Report for submission.
- 1.12 Before an update in response to the questions (para 1.6) is provided through **Chapters 3-5**, it is beneficial to provide some background information. This is presented in **Chapter 2**.

## 2. Background information

- 2.1 To provide context to the modifications being made, it is necessary to revisit the strategic planning policy context provided by the local plans of South Norfolk District Council and Mid Suffolk District Council. Whilst the adopted policy framework remains the same as that reported through the June 2021 Environmental Report, additional progress has been made in relation to the emerging local plans.
- 2.2 Furthermore, to provide context to the assessment process being undertaken, it is necessary to briefly outline the scope of the SEA, and the methodology for the assessment.
- 2.3 This chapter presents the information relating to both these points above.

### Strategic planning policy context

- 2.4 As outlined in the introduction above, the adopted policy frameworks for South Norfolk and Mid Suffolk remain the same as reported through the June 2021 Environment Report and are not necessary to repeat here.
- 2.5 Focus is paid to changes in the policy context provided by the following emerging plans:
  - The Greater Norwich Local Plan
  - South Norfolk Village Clusters Housing Allocations Plan
  - Babergh and Mid Suffolk Joint Local Plan
- 2.6 Each of these emerging plans are considered in turn below.

#### The Greater Norwich Local Plan

- 2.7 When the draft DDNP went out to consultation towards the end of June 2021, the Greater Norwich Local Plan (GNLP) was shortly afterwards (in July) submitted to the Secretary of State for examination. Examination hearings commenced in February 2022 and are currently ongoing.
- 2.8 The submitted GNLP currently undergoing examination continues to identify Diss as a 'main town' in the second tier of the settlement hierarchy. Policy 7.2 identifies a similar total housing commitment for Diss at 763 dwellings over the period 2018 to 2038 (with 765 dwellings identified in the earlier Regulation 19 GNLP).
- 2.9 However, whereas previously the GNLP sought to roll-over any unbuilt allocations from the adopted local plan, this approach has been dropped and decision-making devolved to the DDNP. Thus, in the continued development of the DDNP, the decision is now being made as to whether rolled-over allocations should continue to form part of the future development strategy for Diss.
- 2.10 One strategic allocation in Diss continues to feature in the submitted GNLP (Policy GNLP0102), where the 'Land at Frontier Agriculture Ltd, Sandy Lane, Diss' is allocated for the development of 150 new homes.



2.11 The changes essentially reduce the 'committed development' figure previously identified and increase the number of homes to be identified through new allocations in the DDNP. Whereas previously land was being identified through the DDNP to deliver an additional 250 dwellings (alongside the identified commitments), land is now being sought to accommodate a total of 381 new homes. This change constitutes a major modification to the draft DDNP that was previously consulted on and is the focus point for this subsequent report.

## South Norfolk Village Clusters Housing Allocations Plan

2.12 As noted in the June 2021 SEA Environmental Report, consultation on the South Norfolk Village Clusters Housing Allocations Plan (VCHAP) was running parallel to consultation on the draft DDNP in the summer of 2021. A final consultation on the VCHAP is expected soon prior to the intention to submit the document to the Secretary of State for independent examination in summer 2022.

2.13 At this stage, it is anticipated that the VCHAP will continue the approach outlined through consultation undertaken in 2021, which identifies that the assessment and allocation of sites in village clusters falling within the neighbourhood area will be undertaken through the neighbourhood planning process. The village clusters falling within the neighbourhood area include Burston, Scole, and Roydon, where a minimum of 25 new homes in each cluster are expected to be planned for.

## Babergh and Mid Suffolk Joint Local Plan

2.14 As reported in the June 2021 SEA Environmental Report, the Babergh and Mid Suffolk Joint Local Plan (JLP) was submitted to the Secretary of State for independent examination in March 2021.

2.15 The submitted JLP sought to provide housing within the hinterland and hamlets of Mid Suffolk and Policy LS01 allocates two sites in Oakley (Land north and south of the B1118) to deliver a total of 15 dwellings.

2.16 In December 2021, correspondence between Babergh and Mid Suffolk District Councils and the Inspectors (document G09<sup>4</sup> and G10<sup>5</sup>) indicate that the emerging JLP will be divided into two parts, in which the existing housing allocation policies (including Policy LS01) would be deleted from the emerging plan and the settlement boundaries in the adopted 1998 Mid Suffolk Local Plan and 2008 Core Strategy (as opposed to proposed) policies map would be retained. A review of the settlement hierarchy is also likely to be undertaken.

2.17 Certain spatial elements of the submitted plan are considered unsound at present and would require further review with a more up-to-date and robust evidence base. They are thus likely to be considered in the preparation and adoption of a 'Part 2' JLP which is expected to start as soon as possible after the adoption of 'Part 1' of the emerging JLP.

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<sup>4</sup> Available at: <https://www.midsuffolk.gov.uk/assets/Strategic-Planning/JLPExamination/CoreDocLibrary/G-ExaminationCorrespondence/G09-Letter-Inspectors-to-BMSDC.pdf>

<sup>5</sup> Available at: <https://www.midsuffolk.gov.uk/assets/Strategic-Planning/JLPExamination/CoreDocLibrary/G-ExaminationCorrespondence/G10-Letter-BMSDC-to-Inspectors.pdf>

2.18 At this stage, the DDNP Steering Group are still working towards a housing needs figure of 15 homes within Brome and Oakley.

## Scope of the SEA

2.19 The aim here is to introduce the reader to the scope of the SEA, i.e., the sustainability issues/ objectives that should be a focus of (and provide a methodological framework for) SEA. To understand and arrive at the key sustainability issues and objectives in focus, a scoping process was followed which set out:

- A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the DDNP and SEA.
- Baseline data against which the DDNP can be assessed; and
- The future baseline in the absence of a neighbourhood plan.

2.20 This scoping information was consulted upon with statutory consultees and is presented in **Appendix B of the June 2021 Environmental Report**. It is not considered necessary to repeat this information, instead a summary of the resultant framework of objectives and assessment questions is provided in **Table 2.1** below. This framework provides a broad methodology and consistent approach to assessing all options and policies emerging in the DDNP.

**Table 2.1: The SEA framework**

SEA theme	SEA objective	Assessment questions (will the option/ proposal help to...)
Biodiversity	To maintain and enhance the extent and quality of biodiversity and geodiversity sites and networks within and surrounding the Plan area.	<ul style="list-style-type: none"> <li>• Protect and enhance European, nationally and locally designated sites, including supporting habitats and mobile species that are important to the integrity of these sites?</li> <li>• Protect and enhance priority habitats and the links between them?</li> <li>• Support the delivery of biodiversity net gains?</li> <li>• Support habitat restoration or new habitat creation within the identified Network Enhancement or Expansion Zones?</li> <li>• Support enhancements to multifunctional green infrastructure networks and the network of open spaces which reduce recreational pressures on designated sites?</li> </ul>
Climate change	Reduce the contribution to climate change made by activities in the Plan area.	<ul style="list-style-type: none"> <li>• Reduce the number of journeys made by polluting vehicles?</li> <li>• Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> <li>• Improve or extend local footpaths, cycle paths or strategic GI routes?</li> <li>• Increase the number of new development meeting or exceeding sustainable design criteria?</li> <li>• Generate energy from low or zero carbon sources?</li> </ul>

SEA theme	SEA objective	Assessment questions (will the option/ proposal help to...)
		<ul style="list-style-type: none"> <li>• Reduce energy consumption from non-renewable resources?</li> <li>• Support the transition to electric vehicles?</li> </ul>
	Support the resilience of the Plan area to the potential effects of climate change, including flooding.	<ul style="list-style-type: none"> <li>• Avoid inappropriate development in areas at risk of flooding, considering the likely future effects of climate change?</li> <li>• Improve and extend green infrastructure networks in the Plan area?</li> <li>• Sustainably manage water run-off?</li> <li>• Increase the resilience of the local built and natural environment?</li> <li>• Ensure the potential risks associated with climate change are duly considered in the design of new development in the Plan area?</li> </ul>
Health and wellbeing	Improve the health and wellbeing of residents within the DDNP area.	<ul style="list-style-type: none"> <li>• Promote accessibility to a range of leisure, health and community facilities, for all age groups?</li> <li>• Provide and enhance community access to open green spaces?</li> <li>• Promote the use of healthier modes of travel, including active travel networks?</li> <li>• Improve access to the countryside for recreational use?</li> <li>• Avoid negative impacts to the quality and/ or extent of existing recreational assets, including formal and informal footpaths?</li> <li>• Contribute to reducing social isolation?</li> </ul>
Historic environment	To protect, conserve and enhance the historic environment within and surrounding the DDNP area.	<ul style="list-style-type: none"> <li>• Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their settings?</li> <li>• Conserve and enhance the special interest, character and appearance of locally important features and their settings?</li> <li>• Protect the integrity of the historic setting of key monuments of cultural heritage interest as listed in the Suffolk and Norfolk HERs?</li> <li>• Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies?</li> <li>• Support access to, interpretation and understanding of the historic evolution and character of the DDNP area?</li> </ul>
Land, soil and water resources	To ensure the efficient and effective use of land	<ul style="list-style-type: none"> <li>• Avoid the loss of high-quality agricultural land resources?</li> <li>• Avoid the unnecessary sterilisation of, or hindering of access to mineral resources in the Plan area?</li> <li>• Affect the integrity of waste infrastructure within and surrounding the Plan area?</li> <li>• Promote any opportunities for the use of previously developed land, or vacant/ underutilised land?</li> </ul>
	To protect and enhance water quality,	<ul style="list-style-type: none"> <li>• Avoid impacts on water quality?</li> </ul>

SEA theme	SEA objective	Assessment questions (will the option/ proposal help to...)
	and use and manage water resources in a sustainable manner	<ul style="list-style-type: none"> <li>• Support improvements to water quality?</li> <li>• Ensure appropriate drainage and mitigation is delivered alongside development?</li> <li>• Protect waterbodies from pollution?</li> <li>• Maximise water efficiency and opportunities for water harvesting and/ or water recycling?</li> <li>• Improve the resilience of water supplies?</li> </ul>
Landscape	To protect and enhance the character and quality of the immediate and surrounding landscape, including the river corridor and strategic GI links.	<ul style="list-style-type: none"> <li>• Protect and/ or enhance local landscape character and quality of place?</li> <li>• Conserve and enhance local identity, diversity and settlement character?</li> <li>• Identify and protect locally important viewpoints which contribute to character and sense of place?</li> <li>• Protect and extend/ enhance strategic and local GI corridors?</li> <li>• Protect visual amenity and where appropriate, building vernacular?</li> <li>• Retain and enhance landscape features that contribute to the river setting, or rural setting, including trees and hedgerows?</li> </ul>
Population and communities	Ensure growth in the Plan area is aligned with the needs of all residents and in suitably connected places, supported by the appropriate and timely provision of infrastructure to enable cohesive and inclusive communities.	<ul style="list-style-type: none"> <li>• Provide everyone with the opportunity to live in good quality and affordable housing?</li> <li>• Support the provision of a range of house types and sizes targeted at aligning the housing stock with local needs?</li> <li>• Provide flexible and adaptable homes that meet people's changing needs?</li> <li>• Improve the availability and/ or accessibility of local services and facilities?</li> <li>• Encourage and promote social cohesion and active involvement of local people in community activities?</li> <li>• Contribute to improving levels or aspects of deprivation in the Plan area?</li> <li>• Maintain or enhance the quality of life of existing and future residents?</li> </ul>
Transportation and movement	Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> <li>• Encourage more use of sustainable transport modes?</li> <li>• Encourage the uptake of active travel opportunities?</li> <li>• Extend or improve active travel networks?</li> <li>• Enable sustainable transport infrastructure improvements?</li> <li>• Ensure sufficient road capacity to accommodate new development?</li> <li>• Facilitate on-going high levels of home and remote working?</li> <li>• Improve road safety?</li> <li>• Reduce impacts on residents from the road network?</li> <li>• Improve parking facilities?</li> </ul>

## 3. Revisiting alternatives (an update to Part 1 of the Environmental Report)

### Overview

- 3.1 A key element of the SEA process is the appraisal of ‘reasonable alternatives’ for the DDNP. The SEA Regulations<sup>6</sup> are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the ‘plan and reasonable alternatives taking into account the objectives and geographical scope of the plan’.
- 3.2 The June 2021 SEA Environmental Report has established allocating land for housing development as the key issue to be considered in relation to reasonable alternative approaches. Alternative sites have thus been explored within the parishes where there is a Plan objective to allocate land for housing.
- 3.3 Alternatives are now being revisited in light of the following key changes:
- The DDNP decision as to whether existing unbuilt allocation sites from the adopted South Norfolk Local Plan will continue to be allocated in the DDNP to meet future housing needs (with decision-making devolved by the Local Plan process). This effectively increases the level of growth to be planned for through the DDNP, with existing allocation sites to be rolled over no longer automatically counting towards the overall need for 763 homes in Diss over the period 2018 - 2038. Instead of identifying sites to meet a minimum of 250 homes over this period, the DDNP now needs to plan for a minimum of 381 homes in Diss over this period.
  - New and amended sites have emerged through consultation in Diss, Roydon, and Scole, which may require further consideration, especially when considering the first point above.
  - Additional sites have been granted planning permissions since the consultation on the draft DDNP in 2021.
  - The Babergh and Mid Suffolk JLP is no longer likely to allocate sites in Brome and Oakley at this stage of planning, instead pushing back the allocation of sites to the preparation of a Part 2 of the JLP. The DDNP is therefore faced with choices in terms of growth at Brome and Oakley and recognise that a Local Plan Part 2 is also likely to revisit the settlement hierarchy which may have implications for Palgrave and Stuston as well as Brome and Oakley.
- 3.4 To better understand these changes, each parish within the neighbourhood area is explored in turn below, beginning with the parishes that fall within the boundary of South Norfolk (Diss, Roydon, Scole, and Burston and Shimpling), followed by the parishes that fall within the boundary of Mid Suffolk (Brome and Oakley, Palgrave, and Stuston).

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<sup>6</sup> Environmental Assessment of Plans and Programmes Regulations 2004

## Diss

- 3.5 The GNLP now identifies that the housing commitment for Diss of 763 over the plan period 2018-2038 is formed partly of completions between April 2018 and March 2020 (137 dwellings), additional planning permissions granted since 2018 (95 dwellings), and an allocation at the 'Land at Frontier Agriculture Ltd, Sandy Lane' delivering 150 homes. Together these sources contribute a total of 382 dwellings, leaving a residual need to identify land for 381 homes through new allocations in the DDNP.
- 3.6 Additional permissions which have been more recently granted but not included within the GNLP calculation above include:
- Land south of Thatcher's Needle; contributing 73 retirement homes. This is also the adopted JCS allocation site DIS6 (also known as the Former Hamlins Factory Site, Park Road).
  - Land north of Nelson Road, Diss; (extra care homes) contributing the equivalent of 43 dwellings (this has recently been amended to reflect South Norfolk's recalculation of equivalent dwellings at this site).
- 3.7 Considering the additional permissions for 116 homes the residual need is reduced to 265 homes.
- 3.8 Further of note, three brownfield sites exist within the Diss settlement boundary that are prioritised in the future growth strategy for Diss (as discussed in the June 2021 SEA Environmental Report). These three sites (the old school at Causeway Close, the current Leisure Centre, and the land west of Nelson Road and east of Station Road) will contribute a combined total of 55 homes and further reduce the residual need to 210 homes.
- 3.9 Three rolled-over allocation sites previously formed part of the GNLP spatial strategy for Diss (DIS1, DIS2, and DIS3). However, the choice as to whether these sites continue to form part of the spatial strategy for Diss is now devolved to the neighbourhood plan process. Additional JLP rolled-over employment and mixed-use sites include DIS7 and DIS9 which can also now be considered through the neighbourhood plan process. DIS7 has been considered within the June 2021 SEA Environmental Report. It connects with DIS2 and the site is identified as a preferred location for the relocation of Diss Leisure Centre.
- 3.10 In this respect, feedback through consultation has highlighted the importance of the regeneration of the south side of Park Road, establishing a new 'Waveney Quarter' along the River Waveney. This is a longstanding ambition that has yet to be realised that will enhance the attractiveness of this area and the town centre. Development is sought in this part brownfield location which includes improved green infrastructure, leisure facilities (a new leisure centre) and enabling housing development (estimated need for around 20 enabling homes). A new riverside walk is anticipated to enhance connectivity from Diss Park and Mere. It is formed of the DIS2 and DIS7 rolled over allocation sites, as well as the recently permitted development at the 'Land South of Thatcher's Needle'.
- 3.11 The rolled-over allocation sites of the adopted Local Plan (DIS1, DIS2, DIS3, DIS7, and DIS9) were all appraised in detail as part of the previous plan appraisal (Part 2 of the June 2021 SEA Environmental Report) as they were all

allocated in the draft DDNP. It is therefore not considered necessary to repeat this assessment as it will not unearth new findings.

- 3.12 An application for outline planning permission has also been submitted at site GNL4049 (Land south of Burston Road) for the development of up to 80 homes presenting a new option for growth in the north of Diss.
- 3.13 Previously, the alternatives identified for Diss compared a comprehensive development at the 'land north of the Cemetery, west of Heywood Road and east of Shelfanger Road' with more distributed growth across three sites at Sturgeons Farm, Sandstone Way and Walcot Green. It is recognised that site GNL4049 presents a further alternative to these choices and has not currently been assessed in relation to the SEA objectives. An assessment of the site against the SEA framework is provided in **Appendix A**.

## Roydon

- 3.14 The strategic context for development within the Parish of Roydon (outside the settlement area of Diss) is largely set by the emerging South Norfolk VCHAP and has not changed from that reported through the June 2021 SEA Environmental Report. Two additional sites have been identified through recent consultation on the GNL. Site 735 (Land north of Old High Road) has been found unsuitable for allocation in the DDNP through the recent Site Options Assessment Report (March 2022). Site GNL4010 (Tottington Lane) falls entirely within the proposed 'strategic gap' between Diss and Roydon. As highlighted in the June 2021 SEA Environmental Report, sites within the strategic gap are not considered as suitable sites for consideration through the SEA, given the direct conflict with the DDNP aims to avoid coalescence in this area. No new choices in terms of reasonable alternatives are therefore identified at this stage.

## Scole

- 3.15 The strategic context for development within the parish of Scole is largely set by the emerging South Norfolk VCHAP and has not changed from that reported through the June 2021 SEA Environmental Report. A boundary amendment to site SN4022 (East of Norwich Road) was submitted through consultation on the draft DDNP, but this does not significantly change the boundary assessed through the June 2021 SEA Environmental Report to warrant a reassessment of the options. No further assessment is therefore undertaken in Scole.

## Burston and Shimpling

- 3.16 The strategic context for development within the parish of Burston and Shimpling is largely set by the emerging South Norfolk VCHAP and has not changed from that reported through the June 2021 SEA Environmental Report. No additional sites have emerged that present new choices for the spatial strategy of the DDNP.

## Brome and Oakley

- 3.17 There is no longer an anticipated strategic requirement to allocate the two sites identified in the submitted JLP at the 'land north and south of the B1118' (delivering a combined total of 15 dwellings). Despite this it is recognised that

the development of a JLP Part 2 is likely to revisit the settlement hierarchy and may as a result re-categorise the settlement. At a minimum it is thought likely that the continued need for 15 homes will be identified and met through new allocations, but this is unknown at this stage.

- 3.18 When the draft DDNP was consulted upon in 2021, only three available sites had been identified within Brome and Oakley, two of which were the allocated sites of the submitted JLP, limiting alternatives in this respect. The draft DDNP allocated all three available sites in Brome and Oakley, which were assessed in detail as part of the previous plan appraisal (Part 2 of the June 2021 SEA Environmental Report). It is therefore not considered necessary to repeat this assessment as it will not unearth new findings. No additional sites have emerged since the previous assessment.

## Palgrave

- 3.19 With no strategic requirement, or DDNP intention to allocate land for further housing development in Palgrave, no alternatives have been explored to date within this parish. It is recognised that the development of a JLP Part 2 is likely to revisit the settlement hierarchy and may as a result re-categorise or identify sites to develop in Palgrave, but this is unknown at this stage. Whilst available sites have been identified within Palgrave, all sites except one were found through the supporting Site Options Assessment Report (March 2022) to be unsuitable for allocation. One site (PAL01) was found to be potentially suitable for allocation subject to mitigation, but at this stage, this has not changed the DDNP intention to only allocate land for housing development within those parishes where there is an identified strategic requirement to do so.

## Stuston

- 3.20 As with Palgrave, whilst there is no current strategic requirement to allocate in Stuston, it is recognised that the development of a JLP Part 2 is likely to revisit the settlement hierarchy. This may as a result re-categorise or identify sites to develop in Stuston, but this is unknown at this stage. To date, no available sites have been identified within Stuston through the neighbourhood plan process and no reasonable or viable choices for development within this Parish currently exist.

## Developing the preferred approach

- 3.21 In response to the assessment, the DDNP Steering Group have stated that:

*“All sites considered through the development of the DDNP have been subjected to SEA and the findings of this work has informed the major modifications proposed and continues to inform the development of the DDNP.*

*The major modifications proposed not only reflect a changing local plan context, but also updated evidence in relation to the availability of sites. Whilst this SEA has explored the potential for additional development in the north of Diss, site GNLP4049 is not identified as a preferred allocation site due to concerns over the capacity of the local road network within the vicinity of the site and the quantum of development required can be met through other sites which are preferred by the community.”*



## 4. Current findings (an update to the Part 2 of the Environmental Report)

4.1 The major modifications being consulted upon present changes to both the spatial strategy of the draft DDNP and the proposed policy framework. The changes to the plan are summarised as follows:

- The removal of the following site allocations:
  - Land north of Vince’s Road, Diss (DIS1).
  - Land behind Thatcher’s Needle, Diss (DIS6 - the site has since received planning permission).
  - Land off Denmark Lane, Roydon (DIS3) (relating to Diss settlement area).
  - Land at Rose Farm, Bungay Road, Scole (DDNP09 - site withdrawn by landowner); and
  - Land north of the B1118, Brome and Oakley (DDNP12) removed following recommendations of the site option assessment and SEA.
- A reduction in the number of dwellings proposed at the following site allocations:
  - Land north of the Cemetery, Diss, reduced from 200 dwellings to 180 dwellings (DDNP01).
- New site allocation for 50 homes at ‘Land east of Norwich Road, Scole’ (New DDNP9)
- New policy – Regeneration of the Waveney Quarter (DIS2/7 including an expectation for around 22 new enabling homes)
- New policy – Diss Business Park (DIS9)
- New policy – Surface water management

4.2 These changes are considered in relation to the eight SEA themes established through scoping (see Chapter 2).

### Methodology

4.3 The appraisal is structured under the eight SEA themes taken forward for the purposes of the SEA and that are linked to the SEA objectives (see **Table 3.1**).

4.4 For each theme ‘significant effects’ of the proposed major modifications to the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 1 of the Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the DDNP to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect ‘characteristics’ are described within the assessment as appropriate.

4.5 Every effort is made to identify/ evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to

predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

## Biodiversity

- 4.6 The Habitat Regulations Assessment (HRA) continues to identify that the DDNP will contain sufficient policy mitigation to ensure no adverse effects on the integrity of international designated sites will occur in isolation or in combination with other projects and plans.
- 4.7 The reduction in the number of dwellings proposed at DDNP01 (Land north of the Cemetery) could potentially give over additional space to green infrastructure development and assist in reducing the potential effects of noise and light pollution for the adjacent cemetery County Wildlife Site. The cemetery expansion space is still proposed as part of the allocation, which will see the locally designated habitats expanded and enhanced here.
- 4.8 Most significantly, following feedback from the SEA and considering the outcomes of the most recent Site Options Assessment Report (March 2022), site DDNP12 (Land north of the B1118) at Brome and Oakley has been removed from the spatial strategy which will avoid any loss of Coastal and Floodplain Grazing Marsh.
- 4.9 The land covered by the new allocation proposed at Scole (DDNP9: Land east of Norwich Road) has been proposed as part of a National Habitat Network Expansion Zone, a zone drawn up around existing habitats, where habitat creation and opportunities for improved ecological links between habitats are sought. The zone covering the site relates to deciduous woodland Priority Habitat located north of the settlement. Whilst no significant effects are predicted (given no Priority Habitat loss is anticipated), it is recognised that development has the potential both deliver biodiversity net gains within this area and reduce the potential area that could otherwise be given over to further habitat enhancement.
- 4.10 The removal of certain allocation sites does not affect the previous findings of the Environmental Report, with no specific concerns relating to these sites. Notably, the addition of Policy 3 (Diss Business Park) provides additional policy mitigation to reduce pressures on nearby green corridors and the Frenze Beck County Wildlife Site. The additional provisions of Policy 7 (Surface Water Management) is also likely to indirectly benefit biodiversity, through the support for natural drainage systems including attenuation ponds, green roofs, and planting.
- 4.11 Overall, the previous findings of the Environmental Report remain broadly the same but the potential for minor negative effects is now avoided. As a result, the promotion for active consideration and enhancement of biodiversity and the identified green corridors in the Plan area in future development is likely to provide long-term support for enhanced ecological connections extending the Plan area. **Minor long-term positive effects** are anticipated in this respect.

## Climate change

- 4.12 The removal of certain allocation sites and amended number of dwellings under others will not significantly affect the previous findings of the Environmental Report, with no significant effects anticipated in relation to these options.
- 4.13 The new site proposed at Scole (DDNP9: Land east of Norwich Road) is suitably located to provide excellent access to Scole Primary School and support walkable daily journeys. The site connects with public rights of way and is located with good access to existing bus stops to support sustainable transport connections. The site is not affected by medium or high fluvial flood risk areas, but surface water flood risk is a constraint requiring mitigation in development. The new provisions of Policy 7 (Surface Water Management) will ensure the necessary mitigation is provided, not only within the new site at Scole, but in any future development within the neighbourhood area, and minor positive effects are drawn in this respect.
- 4.14 The new Policy 7 notably develops a previous recommendation from the SEA where it was recognised that a dedicated policy supporting development that realises any potential opportunities to improve drainage and surface water run-off could lead to benefits in relation to climate change objectives.
- 4.15 With little else to add to the discussion presented in the previous Environmental Report, the conclusions of the previous report remain broadly the same. Overall, the DDNP provides good support for a shift towards more sustainable forms of local travel, particularly through the development of green infrastructure supporting attractive walking/ cycle routes. **Minor long-term positive effects** are anticipated in this respect. Despite this, it is recognised that there is potential scope to raise the expected sustainability performance of major development proposals at Diss as per the recommendations of the previous Environmental Report.

## Landscape

- 4.16 In relation to landscape, DDNP01 (Land north of the Cemetery) is noted in the previous assessment for its location covering higher ground north of the Waveney Valley. By reducing the scale of development at this site there is enhanced opportunities to avoid impacts relating long distance views northwards from the cemetery and views into the site from the adjacent footpath through more carefully considered layout, massing, and design. Despite this, the greenfield development is still noted for likely minor long-term negative effects overall and the policy provisions otherwise remain largely the same.
- 4.17 The removal of site allocation DDNP12 (Land north of the B1118) at Brome and Oakley will avoid the loss of priority habitats in this location which contribute to local landscape character.
- 4.18 The new site proposed at Scole (DDNP9: Land east of Norwich Road) is also located on higher ground in the settlement, ultimately increasing the potential for impacts on long-distance views and visual amenity. Development at the greenfield site is also considered likely to lead to minor long-term negative effects in this respect.

- 4.19 Whilst some sites have been removed from Policy 15 (Local Green Spaces) this reflects the suitability assessment undertaken for the sites in relation to their potential as an allocation as Local Green Space in the plan rather than any particular landscape consideration. As a result, the policy update reflects those spaces deemed to meet the criteria for designation and long-term protection, and the plan continues to provide support for this designation where it is feasible to do so.
- 4.20 No significant effects are anticipated, particularly when considering the wider policy suite of the draft DDNP which includes policies relating to high-quality design, green infrastructure development and landscape considerations. In this respect, there is little else to add to the discussion presented within the previous Environmental Report, and the overall conclusions remain broadly the same. Whilst the policy provisions of the DDNP seek to reduce the impact of the proposed spatial strategy (i.e., the allocation sites), the development of greenfield land at edge of settlement locations is considered likely to lead to residual **minor long-term negative effects**.

## Historic environment

- 4.21 The constraints of development within and surrounding designated heritage assets continues to be a challenge for the spatial strategy of the DDNP. The removal of certain allocation sites and amended number of dwellings under others will not significantly affect the previous findings of the Environmental Report where several constraints are outlined.
- 4.22 The new site proposed at Scole (DDNP9: Land east of Norwich Road) lies near the designated Scole Conservation Area, where appropriate consideration will need to be given to the setting of designated heritage assets. The site also lies adjacent to an identified 'Archaeological Area' and the potential for additional finds in the vicinity is noted.
- 4.23 Policy DDNP14 (Designated and Non-Designated Heritage Assets) continues to be the main policy response to the spatial strategy, providing extensive mitigation in relation to both designated and non-designated assets, and their settings. On this basis, there is little else to add to the discussion presented within the previous Environmental Report, and the overall conclusions remain broadly the same.
- 4.24 Overall, the provisions of the DDNP supplement the policy provisions of the Local Plans and the NPPF, particularly by adding local context in terms of non-designated assets. In this respect, the policy provisions reduce the impacts of the proposed spatial strategy, which will inevitably see development in sensitive historic locations. Whilst the overall effects remain **uncertain** in the absence of detailed design and layout schemes at the proposed development sites, no significant effects are considered likely.

## Land, soil, and water resources

- 4.25 Two greenfield sites are removed from the spatial strategy at Diss alongside one greenfield site at Brome and Oakley, which will ultimately reduce the extent of the minor negative effects predicted and brownfield development continues to be prioritised within the spatial strategy.

- 4.26 The new site proposed at Scole (DDNP9: Land east of Norwich Road) is identified within provisional national datasets as Grade 3 agricultural land. However, the dataset is very low resolution and does not differentiate between grade 3a (best and most versatile) and grade 3b (lower quality) land. As a settlement edge site encroaching upon the open countryside, the site could potentially support agricultural uses, and on this basis, its loss is considered likely to lead to permanent minor negative effects.
- 4.27 The addition of Policy 7 (Surface Water Management) will assist in reducing the impacts of surface water flooding on water quality, particularly within the vicinity of the River Waveney and minor benefits are derived in this respect.
- 4.28 With little else to add to the discussion presented within the previous Environmental Report, the overall conclusions remain broadly the same. Whilst there remains an element of **uncertainty** in relation to the precise grade of agricultural land lost to development, **minor long-term negative effects** are anticipated. Despite this, it is recognised that the Plan prioritises brownfield land opportunities where these exist and provides support for the remediation of contaminated land.

## Population and communities

- 4.29 The spatial strategy continues to meet, and in some areas, exceed, the identified strategic housing requirements. The replacement site proposed at Scole (DDNP9: Land east of Norwich Road) will deliver 50 homes and continue the DDNP approach to exceed the strategic housing requirement for 25 homes in Scole. This approach is considered for enhanced positive effects, particularly in relation to the delivery of a greater range of housing types, tenures, and sizes, including affordable housing. The site well located, close to the village's service and facility offer, with particularly good access to Scole Primary School, the public rights of way network and bus stops.
- 4.30 Most of the effects in relation to this SEA theme arise from the broader policy framework and are positive in nature. Notable positive effects relate to policy guidance around the type, tenure, size, and design of development, the development of new community infrastructure (particularly a new leisure centre within the Waveney Quarter and cemetery expansion space north of Diss), and the proposed 'strategic open gap' between Diss and Roydon (supporting the retention of settlement identities and community cohesion). On this basis, the conclusions presented within the previous Environmental Report remain broadly the same.
- 4.31 Overall, the delivery of housing, and its targeted mix, alongside additional community benefits and support for improved accessibility promoted through the DDNP is considered likely to lead to **significant long-term positive effects** in relation to this SEA theme.

## Health and wellbeing

- 4.32 The removal of certain allocation sites and amended number of dwellings under others will not significantly affect the previous findings of the Environmental Report with no significant impacts identified in relation to these options. Whilst reduced development is proposed at site DDNP01 (Land north of the

cemetery), the allocation policy still seeks to deliver the proposed extension to cemetery space.

- 4.33 As noted under previous themes, the new site proposed at Scole (DDNP9: Land east of Norwich Road) is suitably located to provide excellent access to Scole Primary School and support walkable daily journeys. The site connects with public rights of way and is located with good access to Scole Playing Fields and the surrounding countryside.
- 4.34 The additional comprehensive new policy for the Waveney Quarter at Diss (Policy 2) outlines the development expectations for growth of leisure and community facilities and enhanced active travel connections including a new riverside walk.
- 4.35 Furthermore, the new Policy 3 (Diss Business Park) builds on opportunities to enhance active travel connections with existing and new employment areas whilst protecting the function of the nearby Green Corridor network.
- 4.36 Additionally, the provisions of Policy 7 (Surface Water Management) seek to reduce the impacts of surface water flooding, to ultimately reduce its impact locally to homes, employment areas, road infrastructure, and resident health and wellbeing in this respect.
- 4.37 The previous conclusions of the Environmental Report identified that overall, residents are expected to be supported by relatively good access to healthcare, green infrastructure, recreational areas, walking and cycling routes and the surrounding countryside in future development and **minor long-term positive effects** were considered likely as a result.
- 4.38 **Enhanced minor positive effects** are predicted as a result of the major modifications proposed, particularly through the dedicated policy for the Waveney Quarter outlining an appropriate relocation site for the leisure centre in Diss.

## Transportation and movement

- 4.39 A key consideration relates to the known road network capacity and congestion issues along the A1066 and Vince's Road in Diss which are ultimately expected to be exacerbated by the strategic level of growth proposed through the DDNP (as set by the emerging GNLP). The Diss Network Improvement Strategy<sup>7</sup> identifies that even with the provision of a new link road in the north or south of Diss, traffic conditions within the town are expected to worsen. Long-term negative effects are anticipated in this respect, with or without the DDNP. The major modifications to the proposed spatial strategy of the DDNP do not change these anticipated effects.
- 4.40 The replacement site proposed at Scole (DDNP9: Land east of Norwich Road) is considered likely to add to these congestion pressures to some degree in a similar fashion to its predecessor, and even with mitigation, minor long-term negative effects are anticipated at this stage in relation to both congestion and noise. Despite this, the site is well connected to the facilities in the settlement

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<sup>7</sup> Norfolk County Council (2020) Diss Network Improvement Strategy [online] available at: <https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/roads-and-transport/draft-diss-network-improvement-strategy.pdf>

and sustainable transport offer, particularly providing excellent access to Scole Primary School with good potential to support walkable daily journeys.

- 4.41 The new site allocation policy requires a noise impact assessment which identifies noise attenuation measures to be implemented alongside traffic calming measures along Norwich Road and a new pedestrian crossing point to the primary school. Furthermore, the site will also enable traffic access to DDNP10 (The Former Scole Engineering Site) during its construction phase.
- 4.42 A more comprehensive policy for the regeneration of Waveney Quarter (Policy 2) also seeks to enhance active travel connections within this area, particularly through a new riverside walk and enhanced green infrastructure corridors.
- 4.43 There is little else to add to the discussion presented within the previous Environmental Report and the overall conclusions remain broadly the same.
- 4.44 Overall, long-term negative effects are anticipated as a result of any growth in Diss and settlements along the A1066 as part of the future baseline (i.e., with or without the DDNP). The extra policy provisions provided by the DDNP are thus considered for their potential to supplement the Local Plan, and provide further support in enhancing local access, particularly through the identified walking/cycling network within and surrounding the Plan area. The coordination of site allocations north of Diss enable a new link road which, although it is known that this will not sufficiently address road capacity issues, will reduce the extent of the negative impacts arising in further growth of the town. The supplementary provisions of the DDNP are thus considered for **minor positive effects** by reducing the impacts of future growth (the level of which has been determined through the Local Plan).

## Summary and recommendations

- 4.45 Overall, there is no significant departure from the conclusions of the previous Environmental Report, with only enhanced positive effects anticipated in relation to health and wellbeing (particularly as a result of outlining an appropriate relocation site for the leisure centre in Diss). The removal of site allocation DDNP12 (Land north of the B1118) at Brome and Oakley will also avoid any loss of priority habitats in this location and avoid minor negative effects in this respect.
- 4.46 Three of the previous four recommendations have been incorporated into the plan update at this stage, with an appropriate relocation site identified for the leisure centre in Diss, the removal of DDNP12 and avoidance of loss of priority habitat, and additional policy provisions supporting development that realises any potential opportunities to improve drainage and surface water run-off (new Policy 7).
- 4.47 The one outstanding recommendation relates to the potential for the DDNP to support a higher sustainability standard in major development proposals in Diss where it has recommended that policy provisions seek more from proposals at site allocation DDNP01. The viability of additional policy measures are currently being explored by the Steering Group, and further minor policy amendments in this respect may be included within the submission Plan.

## 5. Next steps (an update to Part 3 of the Environmental Report)

### Plan finalisation

- 5.1 Following consultation, responses will be considered before the Plan and SEA Environmental Report are finalised for submission. Following submission, the plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.
- 5.2 If the examination leads to a favourable outcome, the Neighbourhood Plan will then be subject to a referendum, organised by the Local Planning Authority. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the DDNP will become part of the local planning frameworks for South Norfolk and Mid Suffolk, covering the defined Neighbourhood Area.

### Monitoring

- 5.3 The SEA regulations require "*measures envisaged concerning monitoring*" to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.
- 5.4 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by South Norfolk and Mid Suffolk Council, as part of the process of preparing its Annual Monitoring Report (AMR). No additional monitoring measures have been identified at this stage.



# Appendix A Site assessment

This appendix links to **Chapter 3** of the main report and presents an assessment of Site GNLP4049 (Land south of Burston Road) for the development of up to 80 homes.

## Methodology

**Table AA.1** below provides details of the likely effects of the site, assessed against each SEA theme. A ‘policy-off’ approach is taken and where appropriate, neutral effects or uncertain effects will be noted. Every effort is made to predict effects accurately, however, where there is a need to rely on local knowledge or assumptions to reach a conclusion on the likely effects of development, this is made explicit within the appraisal text.

### Key

<b>Significant negative effect</b>	<b>SN</b>	<b>Significant positive effect</b>	<b>SP</b>
<b>Minor negative effect</b>	<b>MN</b>	<b>Minor positive effect</b>	<b>MP</b>
<b>Neutral / no effect</b>	<b>N</b>	<b>Uncertain effect</b>	<b>U</b>

## Findings

**Figure AA.1: Location of GNLP4049 Land south of Burston Road**



SEA theme	Commentary, Site GNLP4049 'Land south of Burston Road' (80 dwellings)	Likely effects
Biodiversity	<p>An allocation at this site is unlikely to adversely impact any internationally or nationally designated sites for biodiversity as none are located within the vicinity of the site. Although the site intersects a Site of Special Scientific Interest (SSSI) Impact Risk Zone (IRZ), this is not relative to the type of development potentially to be taken forward at this site (i.e., residential, or rural residential). Moreover, there are no Biodiversity Action Plan (BAP) priority habitats within or within proximity of the site, nor is the site within a Network Enhancement Zone. The site consists of agricultural land with a sparse covering of trees and hedgerows, and as such, the biodiversity interest of the site itself is limited.</p>	<b>N</b>
Climate change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of Diss town and an intensification of uses at this location. This is anticipated at any location in Diss, and focus is thus drawn to the potential to affect per capita emissions. The town has a good range of services and facilities, and in this respect, residents are less likely to drive to access these further afield. Development at this scale could also seek to enhance community infrastructure where appropriate, e.g., with new recreational areas, that improve accessibility for existing residents at the settlement edge.</p> <p>With reference to flood risk issues, this site falls within Flood Zone 1, with a very low risk of fluvial flooding (meaning that each year this area has a chance of flooding of less than 0.1%). Most of the site also has a very low risk of surface water flooding. However, there are some areas at low to high risk of surface water flooding in the northern extent of the site.</p>	<b>U</b>
Landscape	<p>The site is not within proximity to a National Park, Area of Outstanding Nature Beauty (AONB), or any Green Belt land. The site is located within the 'South Norfolk and High Suffolk Claylands' National Character Area (NCA)<sup>8</sup>. An allocation at this site would result in the loss of greenfield land. The site slopes slightly from south west to north east and is bordered by existing settlements on all sides apart from the north eastern border of the site. The site is relatively large and due to its topography, it is overlooked by many of the dwellings surrounding its boundaries, and in this respect, it is relatively exposed. With reference to</p>	<b>MN</b>

<sup>8</sup> Natural England (2014): 'NCA Profile: 83 South Norfolk and High Suffolk Claylands (NE544)', [online] available to access via [this link](#)

SEA theme	Commentary, Site GNLP4049 'Land south of Burston Road' (80 dwellings)	Likely effects
	<p>locally important landscape features, the site does not contain any trees with Tree Preservation Order (TPO) designations. However, there are a number of TPOs close to the southern boundary of the site, as well as one close to the northern boundary of the site. Ultimately appropriate design, scale, and massing could support reduced landscape impacts.</p>	
Historic environment	<p>The site does not fall within Diss Conservation Area; however, the south western corner of the site is adjacent to the Conservation Area. In this respect, part of the site falls within the setting of the Conservation Area, particularly as the site sits at a lower elevation than the existing settlement. No nationally listed buildings, scheduled monuments, or registered parks and gardens fall within the site. However, Walcot Green lies directly to the east of the site, and contains Grade II listed buildings Alger's Farmhouse, Summerley, Thatch (Cottage), Home Farmhouse, and Homestead. There is also a cluster of Grade II listed buildings near the south western corner of the site, including 49 50 Mount Street, Heywood Cottage, and Eaton Lodge. Development at this site has the potential to disrupt the setting of these listed buildings, particularly with regards to views. Taking a precautionary approach, the potential for negative effects of significance is identified at this stage.</p>	SN
Land, soil, and water resources	<p>A recent 'Agricultural Land Classification (ALC) Assessment' has not been undertaken for this location. However, the ALC assessment undertaken by Natural England in 2010 for Eastern England classified agricultural land on this site as 'Good to Moderate'<sup>9</sup>. The most recent 'Predictive Best and Most Versatile (BMV) Land Assessment' for Eastern England indicates that the site has a moderate likelihood (20 to 60%) of being underlain by BMV land<sup>10</sup>. In this respect, it is uncertain whether development of this site will lead to the loss of productive agricultural land. In terms of the water environment, no watercourses pass through this site. Moreover, the site does not fall within a Source Protection Zone (SPC), however it does fall within a Drinking Water Safeguard Zone (Surface Water). The site also falls within the River Waveney Nitrate Vulnerable Zone (NVZ).</p>	U

<sup>9</sup> Natural England (2010): 'Agricultural Land Classification map Eastern Region (ALC008)', [online] available to access via [this link](#)

<sup>10</sup> Natural England (2017): 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map Eastern Region (ALC020)', [online] available to access via [this link](#)

SEA theme	Commentary, Site GNLP4049 'Land south of Burston Road' (80 dwellings)	Likely effects
Population and communities	Residential development at this site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing. Notably, this site could deliver up to 80 homes, and therefore has the potential to deliver a substantial number of affordable homes. The town has a good range of services and facilities, which are mostly accessible from the site, including employment opportunities, schools, shops, bus stops, and Diss railway station. Diss High School is located just south of the site, on the other side of Walcot Road.	<b>SP</b>
Health and wellbeing	The site is in relatively good proximity to the two nearest general practices, Lawns Practice and Parish Fields Practice, which are both approximately 1.1 kilometres away from the site. The nearest hospital is Hartismere Hospital in Eye, which is approximately 7 kilometres away from the site. Haywood Sports and Fitness is located just south of the site, on the other side of Walcot Road, and it is highly likely that residents will walk to access this facility. The site is well connected to the local Public Right of Way (PRoW) network, and public footpath Diss FP32 passes through the middle of the site.	<b>MP</b>
Transportation and movement	<p>A key consideration relates to the known road network capacity and congestion issues along the A1066 and Vince's Road in Diss which are ultimately expected to be exacerbated by further development in the north of the settlement.</p> <p>This site is located approximately 1.1 kilometres away from the Market Place, where many services and facilities are located. It is likely that some residents will walk to access this area, whilst others will drive. Notably, significant congestion issues are forecast within Diss. With reference to local public transport networks, the site is located approximately 600 metres from the closest bus stop, Willbye Avenue, which is on route 584 serviced by Semmence. This route links Diss to Pulham Market in the north east. The site is also located 900 metres away from another bus stop, Mount Pleasant, which is on route 17, also serviced by Semmence, as well as routes 1 and 371. Route 1 is serviced by Konnect Bus (Norwich Park and Ride) and connects Diss to Norwich. Route 371 is serviced by Coach Services and is the Diss School Bus. Simonds also run several bus services from Diss bus station, with routes to Bury St Edmunds, Beccles, Norwich, East Harling and Ipswich. The site is located approximately 2.6 kilometres from Diss train station.</p>	<b>U</b>

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