



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

Environmental Report

Diss and District Neighbourhood Plan Steering Group

June 2021

Quality information

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Non-Technical Summary

Introduction

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.¹

The DDNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the local development frameworks of South Norfolk District Council and Mid Suffolk District Council.

The SEA Environmental Report, including this NTS, accompanies the 'pre-submission' version of the plan in Regulation 14 consultation.

Structure of the Environmental Report/ this NTS

SEA reporting essentially involves answering the following questions in turn:

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?**

Each of these questions is answered in turn within a discrete 'part' of the Environmental Report and summarised within this NTS. However, firstly there is a need to set the scene further by answering the questions 'What is the Plan seeking to achieve?' and 'What's the scope of the SEA?'

What is the Plan seeking to achieve?

A vision has been established for the DDNP for "*a vibrant community around a thriving market town*", which is underpinned by the following ten aims:

1. *Allocate the required housing growth in sustainable locations across the neighbourhood plan area, ensuring it's the right mix to meet the needs of current and future residents.*
2. *Ensure that new buildings, especially housing, are designed to a high standard and have a positive impact on Diss and the villages, retaining the individuality of each community within the Neighbourhood Plan area.*

¹ 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.

3. *Align growth with the required infrastructure and make sure future development will deliver the infrastructure needed for our communities and businesses.*
4. *Make a positive impact on ecology and ensure everyone across the Plan area has an opportunity to enjoy and support local wildlife.*
5. *Help people choose sustainable ways of getting around in the Neighbourhood Plan area.*
6. *Ensure adequate sports and leisure facilities for the whole community are provided.*
7. *Provide digital connectivity that supports and benefits all businesses and homes across the Neighbourhood Plan area.*
8. *Improve the Diss Town Centre experience for residents and visitors.*
9. *Protect and preserve those special qualities and features that are valued by the community.*
10. *Ensure that the need to address climate change runs through all aspects of the Plan.*

What is the scope of the SEA?

The scope of the SEA is reflected in a list of themes, objectives, and assessment questions, which, taken together indicate the parameters of the SEA and provide a methodological ‘framework’ for assessment. A summary framework is presented here, and a full framework which includes assessment questions is provided within the main Environmental Report (**Table 3.1**).

SEA theme	SEA objective
Biodiversity	To maintain and enhance the extent and quality of biodiversity and geodiversity sites and networks within and surrounding the Plan area.
Climate change	Reduce the contribution to climate change made by activities in the Plan area. Support the resilience of the Plan area to the potential effects of climate change, including flooding.
Health and wellbeing	Improve the health and wellbeing of residents within the DDNP area.
Historic environment	To protect, conserve and enhance the historic environment within and surrounding the DDNP area.
Land, soil and water resources	To ensure the efficient and effective use of land To protect and enhance water quality, and use and manage water resources in a sustainable manner
Landscape	To protect and enhance the character and quality of the immediate and surrounding landscape, including the river corridor and strategic GI links.
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.
Transportation and movement	Promote sustainable transport use and reduce the need to travel.

Plan-making/ SEA up to this point

An important element of the required SEA process involves assessing 'reasonable alternatives' in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the Environmental Report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches for the DDNP.

Specifically, Part 1 of the report –

1. Explains the process of establishing the reasonable alternatives;
2. Presents the outcomes of assessing the reasonable alternatives; and
3. Explains reasons for developing a preferred option, in light of the assessment.

Establishing the reasonable alternatives

Part 1 of the Environmental Report explores both the strategic parameters provided by the Local Plan and the available site options to establish alternatives to the preferred approach for housing development. Alternative options were established for the settlements of Diss, Roydon, Burston and Scole as follows:

Reasonable alternatives for Diss

Site reference	Option 1 (preferred option)	Option 2
Rolled over allocations and committed development		
DIS1: Land north of Vince's Road	35	35
DIS2: Land off Park Road	10	10
DIS3: Land off Denmark Lane	42	42
The 'Frontier Agriculture' site on Sandy Lane	150	150
Land north of Nelson Road (permitted site)	10	10
New allocations		
DISS0003: The Old School, Causeway Close (Malvery House)	10	10
Site 1: Current Leisure Centre	20	20
GNL1045: Land west of Nelson Road and east of Station Road	25	25
DDNP01: Land north of the Cemetery, west of Heywood Road and east of Shelfanger Road	200	-
GNL0362: Sturgeons Farm, Louie's Lane, Shelfanger Road	-	100
GNL0104: Sandstone Way	-	10
GNL0599: Walcot Green	-	75
Total homes (new allocations)	255	240

Reasonable alternatives for Roydon

Site reference	Option 1 (preferred option)	Option 2	Option 3
Site 6: South of the A1066	-	24	-
Site 7: Land opposite the school off Old High Street	25	-	-
SN0526REV: Land south of High Road	-	-	25
Total homes	25	24	25

Reasonable alternatives for Burston

Site reference	Option 1 (preferred option)	Option 2
GNLP0349: Land west of Gissing Road	20	-
GNLP1028: Land east of Mill Road, Crown Farm Barn	5	5
GNLP0386: Land at Rectory Road	-	23
Total homes	25	28

Reasonable alternatives for Scole

Site reference	Option 1	Option 2	Option 3	Option 4
Rolled over allocations and committed development				
GNLP0511: Land east of Norwich Road	25	25	25	25
Land west of Norwich Road in Scole	18	18	18	18
New allocations				
The Former Scole Engineering Site	6	6	6	6
GNLP0338R: Land at Rose Farm off Bungay Road	25	-	-	-
GNLP0527: Land south of Bungay Road	-	26	-	-
GNLP0339: Land at Street Farm, west of Low Road	-	-	15	-
GNLP2066: 1 Bridge Road	-	-	11	-
SN4022: East of Norwich Road	-	-	-	65
Total homes (new allocations)	31	32	32	65

Assessing reasonable alternatives

The full assessment of the options for each settlement are presented in Part 1 of the Environmental Report. The summary findings for each settlement are presented below.

Summary findings for Diss

SEA theme	Rank and likely effects	
	Option 1	Option 2
Biodiversity	=	=

SEA theme	Rank and likely effects	
	Option 1	Option 2
Climate change	=	=
Landscape	1	2
Historic environment	1	2
Land, soil and water resources	=	=
Population and communities	1	2
Health and wellbeing	2	1
Transportation	1	2

Overall, the appraisal has served to highlight the potential for **significant negative effects** under Option 2 in relation to transportation. This reflects a piecemeal growth strategy, with no potential to support significant road infrastructure improvements (for which there is a significant requirement for in Diss).

Minor negative effects are considered likely under both Options in relation to biodiversity, climate change, landscape, and historic environment, as well as for transportation under Option 1. This largely reflects the constraints of the Plan area as a sensitive landscape setting and historic settlement.

Significant positive effects are anticipated in relation to population and communities; by way of meeting the strategic housing requirements. **Minor positive effects** are also considered under Option 2 in relation to health and wellbeing, whilst these effects are less certain under Option 1.

Uncertainty is noted in relation to the land, soil and water resources SEA theme, reflecting the need for more detailed land surveys to inform agricultural classification.

In **conclusion**, the assessment shows Option 1 to outperform Option 2 in respect of most objectives, although it does not automatically follow that Option 1 is 'best' or 'most sustainable' overall, as the objectives are not assigned any particular weight. It is for the Steering Group to weigh the pros and cons of the alternatives 'in the balance' and, in turn, reach an overall conclusion on the best performing scenario – see Chapter 7.

Summary findings for Roydon

SEA theme	Rank and likely effects		
	Option 1	Option 2	Option 3
Biodiversity	1	2	2
Climate change	1	1	2
Landscape	1	3	2
Historic environment	=	=	=
Land, soil and water resources	=	=	=
Population and communities	1	2	3
Health and wellbeing	2	2	1
Transportation	1	1	2

Overall, the assessment has served to highlight the potential for **significant negative effects** under Option 2 in relation to landscape. This is given its prominent position in relation to the settlement character, its relationship with the surrounding countryside and potential impacts on long-distance views.

Minor negative effects in relation to landscape are also anticipated under Options 1 and 3, but the potential for tree screening to support better integration and reduce landscape impacts under these Options is considered.

Minor long-term negative effects are also anticipated under all Options in relation to transportation given the likely impacts of added congestion on the A1066.

Minor positive effects are concluded as likely in relation to population and communities and health and wellbeing, reflecting the potential for each option to deliver against housing needs and provide good access to educational facilities and recreational space.

Uncertainty is noted in relation to soil resources, noting the potential for 'best and most versatile' agricultural land that would need to be established for further survey work. Broadly **neutral effects** (no significant deviation from the baseline) is anticipated in relation to biodiversity, climate change and the historic environment.

In **conclusion**, the assessment shows Option 1 to outperform Options 2 and 3 in respect of most objectives, although it does not automatically follow that Option 1 is 'best' or 'most sustainable' overall, as the objectives are not assigned any particular weight. It is for the Steering Group to weigh the pros and cons of the alternatives 'in the balance' and, in turn, reach an overall conclusion on the best performing scenario – see Chapter 7.

Summary findings for Burston

SEA theme	Rank and likely effects	
	Option 1	Option 2
Biodiversity	=	=
Climate change	1	2
Landscape	1	2
Historic environment	2	1
Land, soil and water resources	=	=
Population and communities	1	2
Health and wellbeing	=	=
Transportation	1	2

Overall, the appraisal has served to highlight a potential for **significant negative effects**. The potential effects of coalescence under Option 2 is highlighted for negative effects of significance in relation to landscape and uncertain effects for communities and future residents. Most notably though, both Options include the 'Land east of Mill Road' site; a sensitive heritage site. The 'Land east of Mill Road' in its current form (as an orchard) is a proposed extension to the Burston Conservation Area, and a change of use to residential at this site could impact upon these proposals and lead to negative effects of significance.

Minor negative effects are also anticipated in relation to the effects of growth on the road transport network within and surrounding Burston, as well as resulting from a loss of greenfield land at the settlement edge.

Minor positive effects are concluded in relation to population and communities under Option 1, and for health and wellbeing under both Options. This relates to the delivery of housing to meet local needs, and the location of development with relatively good access to open space and the surrounding countryside via Public Rights of Way.

Uncertainty is noted in relation to the land, soil and water resources SEA theme, reflecting the need for more detailed land surveys to inform agricultural classification.

With no significant deviations from the baseline anticipated in relation to biodiversity and climate change, broadly **neutral effects** are concluded.

In **conclusion**, the assessment shows Option 1 to outperform Option 2 in respect of most objectives, although it does not automatically follow that Option 1 is 'best' or 'most sustainable' overall, as the objectives are not assigned any particular weight. It is for the Steering Group to weigh the pros and cons of the alternatives 'in the balance' and, in turn, reach an overall conclusion on the best performing scenario – see Chapter 7.

Summary findings for Scole

SEA theme	Rank and likely effects			
	Option 1	Option 2	Option 3	Option 4
Biodiversity	=	=	=	=
Climate change	2	3	3	1
Landscape	1	1	1	2
Historic environment	1	2	3	2
Land, soil and water resources	1	1	1	2
Population and communities	3	2	2	1
Health and wellbeing	1	2	3	1
Transportation	2	1	1	3

Overall, the appraisal has served to highlight the potential for **significant negative effects** under Option 3 in relation to the historic environment. This relates to the cumulative pressures this Option would place on Scole Conservation Area, with all proposed growth located within it.

Minor negative effects are concluded likely for all options in relation to transportation and landscape. This relates to the pressures of additional growth on the road network, the loss of greenfield land within and/ or surrounding the settlement. The potential for minor negative effects on heritage is also identified under Options 2 and 4.

Minor positive effects are concluded in relation to population and communities and health and wellbeing for all Options, reflecting the delivery of housing to support residents in locations with good access to recreational space and the surrounding countryside.

Uncertainty is noted in relation to the land, soil and water resources SEA theme, reflecting the need for more detailed land surveys to inform agricultural classification.

With no significant deviations from the baseline anticipated in relation to biodiversity and climate change, broadly **neutral effects** are concluded for all Options.

In **conclusion**, the assessment shows Option 1 to outperform the other Options in respect of most objectives, although it does not automatically follow that Option 1 is 'best' or 'most sustainable' overall, as the objectives are not assigned any particular weight. It is for the Steering Group to weigh the pros and cons of the alternatives 'in the balance' and, in turn, reach an overall conclusion on the best performing scenario – see Chapter 7.

Developing the preferred approach

The DDNP Steering Group have provided the following reasons for developing the preferred approach in light of the alternatives assessment:

Diss

- *Option 1 continues to be the preferred option as it has shown to outperform Option 2.*
- *The potential for significant negative effects in relation to transport is a concern for Option 2, especially the likelihood of increased traffic along Louis's Lane and Frenze Hall Lane, and the inadequacy of highway infrastructure to deal with that.*
- *There is concern about Option 2 extending the built-up area into the countryside and further eroding the gap between Diss and Roydon.*
- *Option 1 will enable delivery of a new link road to alleviate pressure on the town centre, and also an extension to the Cemetery which is important community infrastructure.*
- *As a mitigating measure we will add a requirement into the allocation policy for the land north of the cemetery to ensure that the Public Footpath which runs along the north edge of the site and the Restricted Byway that bisects the site north-south are preserved. Internal layout will be expected to connect with the two public rights of way and for improvements to be made to the surface and opportunities taken to improve wildlife habitat adjacent to them.*

Roydon

- *Option 1 is the preferred option.*
- *There is significant concern that Options 2&3 which are south of the A1066 will adversely impact on the setting of the Waveney Valley.*
- *They may also impact on the local nature reserve, Roydon Fen which is located just to the south of Options 2 & 3.*
- *Option 1 has shown to be more sustainable a location, adjacent the primary school. This also provides opportunity to improve journeys to school, in relation to drop offs.*

- *As a mitigating measure in relation to transport, we will request consideration of an extension to the 30mph limit between Diss and Roydon and will add this to the supporting text of the NP.*

Burston

- *The SEA has highlighted the potential for significant negative impacts on heritage from the land east of Mill Road site, so it is proposed that option 1 is taken forward, but without this site and instead a slight extension to the Land west of Gissing Road.*
- *Option 2 is rejected on the basis of the landscape impacts it would have, most notably it would develop the land between the existing settlement at Burston and the hamlet of Audley End, leading to increased coalescence and eroding the distinction between the two.*

Scale

- *Option 1 is preferred but with slight extension to the site boundary for Land at Rose Farm off Bungay Road to ensure safe highway access. This particular site (Land at Rose Farm) is no longer a working farm, with former farm buildings current vacant and unused, therefore this option also provides an opportunity to regenerate a redundant site.*
- *Option 2 is considered a fair alternative to Option 1 and would deliver housing growth in one central location within close proximity to services. However, it was not best supported by the community during recent consultations and doesn't have the advantage of regenerating a redundant farm site.*
- *There is concern that Option 3 would affect the setting of the Conservation Area and potentially impact upon a number of nearby listed buildings.*
- *There is concern that Option 4 would extend the settlement into the open countryside."*

Assessment findings at this stage

Part 2 of the Environmental Report presents an assessment of the draft DDNP. Assessment findings are presented as a series of narratives under the 'SEA framework' theme headings. The following overall conclusions and recommendations are reached:

Biodiversity	Overall, the spatial strategy of the DDNP is deemed likely to lead to some habitat loss/ fragmentation and the loss of floodplain grazing marsh at Lower Oakley may be more difficult to directly compensate for given the nature of the habitat as part of the floodplain in this area. As a result, long term minor negative effects are anticipated. Despite this, 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	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 potentially scope to raise the expected sustainability performance of major development proposals at Diss. Whilst no significant effects are

	anticipated in relation to flood risk as a result of the proposed spatial strategy, it is recognised that additional adaptation benefits could be sought through development that realises opportunities to improve drainage, particularly within the existing road infrastructure network.
Landscape	Overall, the policy provisions of the DDNP seek to reduce the impact of the proposed spatial strategy (i.e. allocation sites). Despite this, the development of greenfield land at edge of settlement locations is considered likely to lead to residual minor long-term negative effects .
Historic environment	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	Overall, 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	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	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 (as proposed through the DDNP). On this basis, minor long-term positive effects are considered likely. It is recognised that there is the potential to enhance positive effects, by identifying an appropriate relocation site for the leisure centre through the planning framework.
Transportation	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 the positive effects of reducing the impacts of future growth (the level of which has been determined through the Local Plan).

Recommendations

The appraisal of the draft DDNP has identified the followings recommendations which seek to minimise the potential for negative effects and maximise the potential for positive effects in relation to the relevant SEA themes:

- **Biodiversity** – it is recommended that the impacts for biodiversity in the loss and fragmentation of floodplain grazing marsh Priority Habitat at site allocation DDNP14 are considered in more detail through the policy framework. Appropriate compensation should be sought as a minimum.
- **Climate change** – two recommendations are made in relation to climate change. The first recognises the potential for the DDNP to support a higher sustainability

standard in major development proposals in Diss and recommends that policy provisions seek more from proposals at site allocation DDNP01. The second recommendation identifies the potential benefit of additional policy provisions which seek to ensure that development at the allocation sites identifies any opportunity (where these exist) to improve surface water run-off rates, particularly in the creation of new site access and egress points where there is known high surface water flood risk on adjacent roads.

- **Health and wellbeing** – it is recognised that there is the potential to enhance positive effects in relation to health and wellbeing, by identifying an appropriate relocation site for Diss Leisure Centre within the planning framework of the DDNP.

Next steps

Part 3 of the report explains the next steps that will be taken as part of plan-making and SEA.

Plan finalisation

Following consultation, responses will be considered before the Plan and SEA Environmental 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.

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 Plan Area.

Monitoring

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.

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.

1. Introduction

Background

- 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 development frameworks of South Norfolk District Council and Mid Suffolk District Council.
- 1.3 Once 'made' the DDNP will have material weight when deciding on planning applications, alongside the current South Norfolk and Mid Suffolk local development frameworks.
- 1.4 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.²

SEA explained

- 1.5 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.
- 1.6 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".³ The report must be taken into account, alongside consultation responses, when finalising the plan.
- 1.7 More specifically, the Report must answer the following three questions:
 4. What has plan-making/ SEA involved up to this point?
 - Including in relation to 'reasonable alternatives'.
 5. What are the SEA findings at this stage?
 - i.e. in relation to the draft plan
 6. What happens next?

² 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.

³ v

This Environmental Report

- 1.8 This report is the Environmental Report for the DDNP. It is published alongside the 'pre-submission' version of the plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.9 This report essentially answers questions 1, 2 and 3 in turn, to provide the required information.⁴ Each question is answered within a discrete 'part' of the report.
- 1.10 However, before answering Q1, two initial questions are answered to further set the scene; what is the plan seeking to achieve? And what is the scope of the SEA?

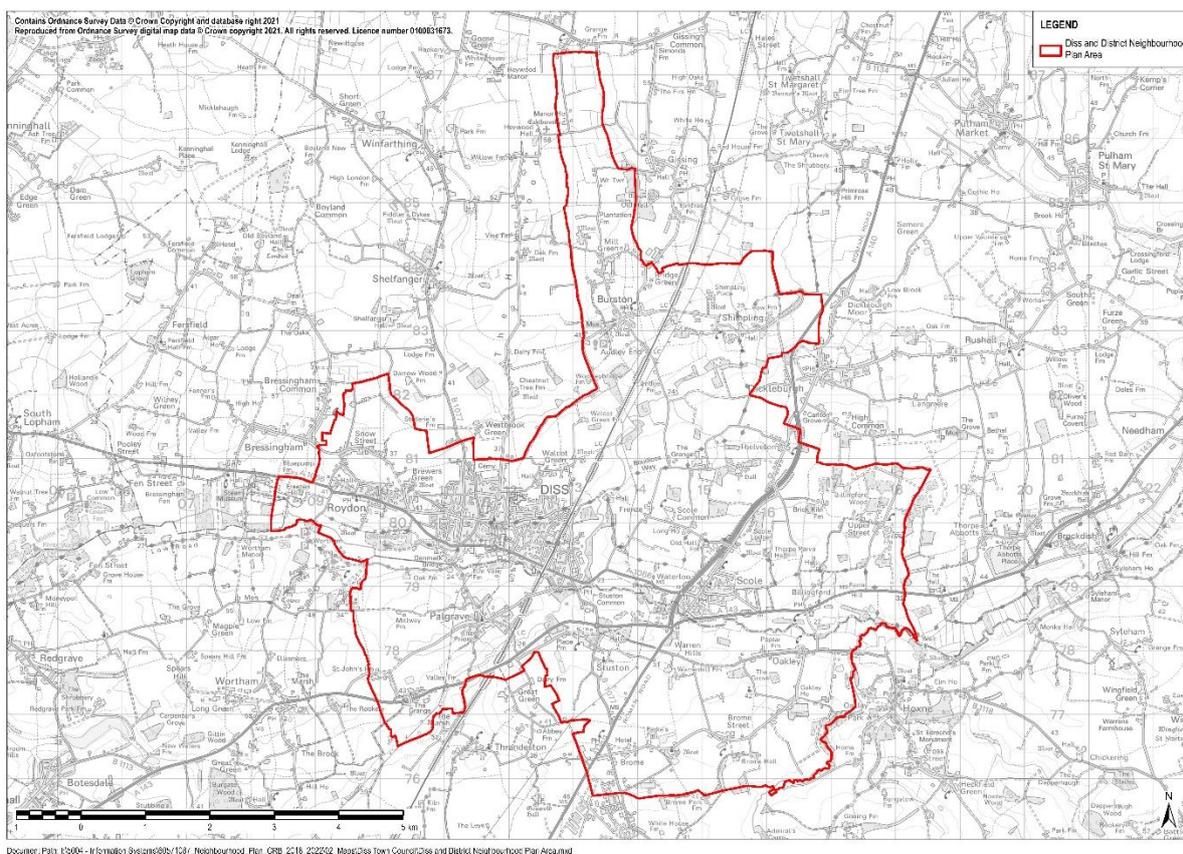
⁴ See **Appendix A** for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2. What is the DDNP seeking to achieve?

Introduction

2.1 This section considers the strategic planning policy context provided by the adopted and emerging local development frameworks of South Norfolk District Council and Mid-Suffolk District Council. It then goes on to present the DDNP vision and objectives. **Figure 2.1** below presents the Plan area.

Figure 2.1: Diss and District Neighbourhood Plan area



Strategic planning policy context

2.2 The Plan area crosses two local planning authority areas (South Norfolk and Mid-Suffolk). The local planning frameworks of both areas will need to be taken into consideration in the development of the DDNP.

2.3 The parishes of Diss, Roydon, Burston and Shimpling, and Scole fall with the boundary of **South Norfolk**, where the adopted local development framework consists of:

- The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk adopted in 2011 and amended in 2014;
- The Site Specific Allocations and Policies Document adopted in 2015; and
- The Development Management Policies Document adopted in 2015.

- 2.4 The JCS is currently under review through work on a new Greater Norwich Local Plan (GNLP). The GNLP is at a fairly advanced stage of development, with consultation on a Regulation 19 'Pre-Submission' draft of the Plan recently concluding in March 2021 and submission to the Secretary of State for examination anticipated in July 2021.⁵
- 2.5 Furthermore, South Norfolk District Council are also progressing a new South Norfolk Village Clusters Housing Allocation Plan (VCHAP). The VCHAP is a housing allocations document that will shape development within the South Norfolk villages, identifying land for a minimum of 1,200 new homes. A Regulation 18 Consultation Version of the VCHAP has recently been publicised with consultation running until August 2021.⁶ The consultation version of the VCHAP does not identify sites within the Diss and District villages (Burston & Shimpling, Roydon, and Scole) recognising that this is being done through the development of the DDNP.
- 2.6 The Parishes of Palgrave, Stuston and Brome and Oakley fall within the boundary of **Mid Suffolk**.
- 2.7 The adopted Mid Suffolk local planning framework consists of:
- The Core Strategy Focused Review Document adopted in 2012; and
 - The saved policies of the 1998 Local Plan.
- 2.8 Mid Suffolk District Council are currently working with Babergh District Council to develop a Joint Local Plan (JLP). The Joint Local Plan is at a relatively progressed stage of development, having recently been submitted to the Secretary of State for Housing, Communities and Local Government for Independent Examination (in March 2021). The JLP will replace the Core Strategy and saved policies of the 1998 Local Plan.

Housing numbers to be delivered in the DDNP area

- 2.9 The DDNP must be in general conformity with the strategic policies of the adopted Development Plan, as per footnote 16 of the National Planning Policy Framework (NPPF) (2019). Additionally, the NPPF states that "*local planning authorities may give weight to relevant policies in emerging plans*" according to set criteria which includes its stage of preparation.
- 2.10 In this respect, the emerging GNLP, VCHAP and JLP provide the main strategic context for the DDNP, forecasting the housing and employment needs across the districts over the plan period of the DDNP.
- 2.11 In **South Norfolk**, Policy 1 of the Regulation 19 'Pre-Submission' version of the GNLP identifies Diss as a Main Town in South Norfolk. The Key Diagram further identifies that including committed development, **765 new homes are anticipated in Diss in the period up to 2038**. Most of the growth occurring across the district in the period up to 2038 is committed development, including that identified through the existing JCS. However, GNLP Table 6 identifies the total number of homes anticipated to be delivered through new allocations in the GNLP, VCHAP, and DDNP. In this respect, Table 6 requires the **DDNP to**

⁵ Consultation ran 01 Feb 2021 – 22 Mar 2021 [online] available at: <https://www.gnlp.org.uk/>

⁶ Consultation runs 07/06/21 – 02/08/21 [online] available at: <https://www.southnorfolkandbroadland.gov.uk/emerging-local-plan/south-norfolk-village-clusters-housing-allocations-plan>

identify additional land to deliver 250 dwellings to be identified through new site allocations in Diss in the DDNP.

2.12 In **Mid Suffolk**, The Babergh and Mid Suffolk JLP (submission version) Policy SP03 defines the settlement hierarchy, with Table 3 identifying Palgrave, Stuston and Brome as ‘Hinterland Villages’ and Oakley as a ‘Hamlet Village’. Policy SP04 goes on to identify the spatial distribution of housing across the settlement hierarchy, supported by Table 4 which outlines minimum housing requirements for neighbourhood plan areas. Table 4 identifies that the Mid Suffolk parishes forming part of the DDNP are required to deliver a total of **64 homes in the period up to 2037**, 49 of which have already received planning permission. The residual need for 15 homes has been met through the allocations proposed in Policy LS01, which allocates the following sites in Oakley:

- Land south of B1118 for 5 dwellings; and
- Land north of B1118 for 10 dwellings.

2.13 Therefore, the strategic directions of the JLP **do not require further development in the Mid Suffolk parishes of the DDNP area** over the Plan period.

DDNP vision and objectives

2.14 A vision has been established for the DDNP for “*a vibrant community around a thriving market town*”, which is underpinned by ten identified aims as follows:

7. Allocate the required housing growth in sustainable locations across the neighbourhood plan area, ensuring it’s the right mix to meet the needs of current and future residents.
8. Ensure that new buildings, especially housing, are designed to a high standard and have a positive impact on Diss and the villages, retaining the individuality of each community within the Neighbourhood Plan area.
9. Align growth with the required infrastructure and make sure future development will deliver the infrastructure needed for our communities and businesses.
10. Make a positive impact on ecology and ensure everyone across the Plan area has an opportunity to enjoy and support local wildlife.
11. Help people choose sustainable ways of getting around in the Neighbourhood Plan area.
12. Ensure adequate sports and leisure facilities for the whole community are provided.
13. Provide digital connectivity that supports and benefits all businesses and homes across the Neighbourhood Plan area.
14. Improve the Diss Town Centre experience for residents and visitors.
15. Protect and preserve those special qualities and features that are valued by the community.
16. Ensure that the need to address climate change runs through all aspects of the Plan.

3. What is the scope of the SEA?

Introduction

3.1 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, the scoping process has set out:

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

3.2 This scoping information is presented in **Appendix B**.

Consultation

3.3 The SEA Regulation require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁷ As such, these authorities were consulted in 2021. Consultation responses can be found alongside the updated scoping information presented in **Appendix B**.

Key issues

3.4 The scoping information has identified eight themes that remain a focus for the SEA. The key issues identified against each of these themes are presented below.

Biodiversity

- Any larger-scale development proposals in Palgrave and Roydon (50+ homes outside of the settlement or 100+ homes in the settlement areas) will require further consultation with Natural England in relation to potential impacts upon nationally designated SSSIs.
- Development in the Plan area should consider the likely additional recreational needs arising, and plan for good access to open and green spaces which reduce recreational pressures on nearby designated biodiversity sites.
- Whilst the designated sites are sensitive to changes in water levels, water companies will continue to manage abstraction to meet local needs, and the proposals of the DDNP are unlikely to lead to significant effects in this respect. However, if the proposals of the DDNP significantly exceed the

⁷ These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

growth planned for in the Local Development Frameworks, additional consultation with water companies may be required.

- Development in areas south of the A1066 (particularly in the western approach to Diss) has the potential to affect the Roydon Fen LNR; particularly as a result of increased recreational disturbance, but also due to the effects of noise, light and air pollution.
- Growth in the DDNP area should seek to avoid the loss or fragmentation of Priority Habitat. Instead, the DDNP provides an opportunity to set out both site-specific mitigation (e.g. mitigation to reduce the effects of light pollution) and targeted habitat enhancement/ creation in development, guided by the identified Network Enhancement and Expansion Zones.

Climate change (including flood risk)

- The DDNP area is partially affected by areas of high and medium fluvial and surface water flood risk. The DDNP provides the opportunity to direct growth away from areas of current, or potentially future flood risk. In areas of surface water flood risk, development which provides improved drainage could also reduce flood risk in the long-term. Furthermore, it will be important for any development in the vicinity of the floodplain to ensure that suitable drainage is provided which ensures development will not lead to adverse effects on water quality.
- As a rural area, the transport sector continues to be a key challenge in terms of reducing emissions. The DDNP provides opportunities to guide development towards the most accessible locations in the Plan area and require local infrastructure (including walking and cycling infrastructure) improvements where appropriate.
- The DDNP should seek to maximise opportunities for local renewable energy and electric vehicle infrastructure development, as well as new green infrastructure and improved ecological links, to complement the existing district, county and regional climate change plans.

Landscape

- Whilst there are no protected landscapes in the DDNP area, the area is well recognised as part of the river corridor and its special landscape setting, with strategic green infrastructure links and rich habitats. The area south of the Waverley is designated as a Special Landscape Area in the saved policies of the 1998 Mid Suffolk Local Plan. Despite growth in settlement areas, the overall rural character has been retained, along with a building vernacular (prevalence of functional buildings e.g. farmhouses) in some areas. Insensitive development ultimately has the potential to affect this setting and the character of certain areas. The DDNP provides opportunities to avoid/ mitigate significant landscape impacts, including by protecting the overall settlement pattern and directing growth so as to minimise the loss of landscape features.
- The DDNP provides opportunities for enhanced landscape protections, e.g. through policy provisions which identify and protect valued local views and vistas, as well as direct landscape improvements, e.g. through new Green

Infrastructure (GI) requirements and/ or the proposed regeneration of derelict or despoiled areas.

Historic environment

- With a wealth of designated and non-designated assets (including archaeological assets) in the DDNP area, it will be important to ensure that future development avoids/ minimises impacts upon the historic environment and maximises opportunities to improve the public realm and green infrastructure; to the indirect benefit of heritage settings.
- Opportunities to support the reinstatement/ restoration and long-term management of heritage 'at risk' should be sought where they exist.
- Assets acknowledged for their local heritage value could benefit from additional policy protections and provisions within the DDNP.

Land, soil and water resources

- The precise Agricultural Land Classification (ALC) is unknown for much of the DDNP area and so the extent and significance of potential effects in development may be more difficult to ascertain in the absence of site level investigations. Despite this, it is predicted that higher quality agricultural land exists around Stuston and Brome and Oakley, and the DDNP provides opportunities to avoid/ minimise the loss of agricultural land in these areas.
- The DDNP will need to consider the potential development requirements for further consultation as part of a Minerals Consultation Area, and ultimately the spatial strategy should not undermine the integrity of key waste infrastructure situated within and surrounding the Plan area.
- As part of a riparian environment (relating to or situated on the banks of the river), it will be important for future development to ensure that it avoids any detrimental impacts on water quality both on and off-site. This equally applies to road infrastructure impacts on water quality in the Plan area. Furthermore, the DDNP should seek to capitalise on any potential opportunities to improve water quality, particularly chemical quality (such as improved transport drainage).
- The DDNP could also seek to support extended measures to improve the resilience of water supplies, including through local water recycling schemes and opportunities to increase efficiency in water use.

Population and communities

- The DDNP provides the opportunity for enhanced policy provisions which seek to deliver the right mix of housing types, tenures and sizes according to local needs, in suitably connected places.
- The DDNP also provides the opportunity to address certain aspects of deprivation in development, in particular the domains of the living environment and barriers to housing and services in the areas outside of Diss, Roydon and Scole.

Health and wellbeing

- There is a lack of accessible green space across the DDNP area, and the DDNP provides the opportunity to require appropriate development contributions to addressing these shortfalls. Planning can also support the interconnectivity of open and recreational spaces, maximising their access by sustainable modes (e.g. walking and cycling).
- The DDNP could also seek improvements to the public realm which maximise social inclusion and address any existing infrastructure/ mobility issues for more vulnerable residents.

Transportation and movement

- There is a significant need for early planning in relation to transport and movement in development in the DDNP area, particularly planning should seek to maximise opportunities to reduce the need to travel and access a choice of sustainable transport modes. Appropriate consideration will also need to be given early on to potential development requirements in terms of mitigating impacts on road capacity and access.
- Opportunities to improve and/ or extend active travel connections, alongside public realm improvements and urban greening within the plan are should also be sought.

SEA framework

- 3.5 Informed by the scoping information and development of key issues, the SEA scope is summarised in a list of themes, objectives and assessment questions known as the SEA framework. **Table 3.1** presents the DDNP SEA framework as broadly agreed in 2021.

Table 3.1: SEA framework for the DDNP

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"> • Protect and enhance European, nationally and locally designated sites, including supporting habitats and mobile species that are important to the integrity of these sites? • Protect and enhance priority habitats and the links between them? • Support the delivery of biodiversity net gains? • Support habitat restoration or new habitat creation within the identified Network Enhancement or Expansion Zones? • Support enhancements to multifunctional green infrastructure networks and the network of open spaces which reduce recreational pressures on designated sites?
Climate change	Reduce the contribution to climate change made by activities in the Plan area.	<ul style="list-style-type: none"> • Reduce the number of journeys made by polluting vehicles? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Improve or extend local footpaths, cycle paths or strategic GI routes? • Increase the number of new development meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources? • Support the transition to electric vehicles?
	Support the resilience of the Plan area to the potential effects of climate change, including flooding.	<ul style="list-style-type: none"> • Avoid inappropriate development in areas at risk of flooding, considering the likely future effects of climate change? • Improve and extend green infrastructure networks in the Plan area? • Sustainably manage water run-off? • Increase the resilience of the local built and natural environment? • Ensure the potential risks associated with climate change are duly considered in the design of new development in the Plan area?
Health and wellbeing	Improve the health and wellbeing of residents within the DDNP area.	<ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Provide and enhance community access to open green spaces? • Promote the use of healthier modes of travel, including active travel networks? • Improve access to the countryside for recreational use? • Avoid negative impacts to the quality and/ or extent of existing recreational assets, including formal and informal footpaths? • Contribute to reducing social isolation?

SEA theme	SEA objective	Assessment questions (will the option/ proposal help to...)
Historic environment	To protect, conserve and enhance the historic environment within and surrounding the DDNP area.	<ul style="list-style-type: none"> • Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their settings? • Conserve and enhance the special interest, character and appearance of locally important features and their settings? • Protect the integrity of the historic setting of key monuments of cultural heritage interest as listed in the Suffolk and Norfolk HERs? • Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies? • Support access to, interpretation and understanding of the historic evolution and character of the DDNP area?
Land, soil and water resources	To ensure the efficient and effective use of land	<ul style="list-style-type: none"> • Avoid the loss of high-quality agricultural land resources? • Avoid the unnecessary sterilisation of, or hindering of access to mineral resources in the Plan area? • Affect the integrity of waste infrastructure within and surrounding the Plan area? • Promote any opportunities for the use of previously developed land, or vacant/ underutilised land?
	To protect and enhance water quality, and use and manage water resources in a sustainable manner	<ul style="list-style-type: none"> • Avoid impacts on water quality? • Support improvements to water quality? • Ensure appropriate drainage and mitigation is delivered alongside development? • Protect waterbodies from pollution? • Maximise water efficiency and opportunities for water harvesting and/ or water recycling? • Improve the resilience of water supplies?
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"> • Protect and/ or enhance local landscape character and quality of place? • Conserve and enhance local identity, diversity and settlement character? • Identify and protect locally important viewpoints which contribute to character and sense of place? • Protect and extend/ enhance strategic and local GI corridors? • Protect visual amenity and where appropriate, building vernacular? • Retain and enhance landscape features that contribute to the river setting, or rural setting, including trees and hedgerows?
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	<ul style="list-style-type: none"> • Provide everyone with the opportunity to live in good quality and affordable housing? • Support the provision of a range of house types and sizes targeted at aligning the housing stock with local needs? • Provide flexible and adaptable homes that meet people's changing needs?

SEA theme	SEA objective	Assessment questions (will the option/ proposal help to...)
	timely provision of infrastructure to enable cohesive and inclusive communities.	<ul style="list-style-type: none"> • Improve the availability and/ or accessibility of local services and facilities? • Encourage and promote social cohesion and active involvement of local people in community activities? • Contribute to improving levels or aspects of deprivation in the Plan area? • Maintain or enhance the quality of life of existing and future residents?
Transportation and movement	Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> • Encourage more use of sustainable transport modes? • Encourage the uptake of active travel opportunities? • Extend or improve active travel networks? • Enable sustainable transport infrastructure improvements? • Ensure sufficient road capacity to accommodate new development? • Facilitate on-going high levels of home and remote working? • Improve road safety? • Reduce impacts on residents from the road network? • Improve parking facilities?

Part 1: What has plan-making/ SEA involved to this point?

4. Introduction (to Part 1)

Overview

- 4.1 Whilst work on the DDNP has been underway for some time, the aim here is not to provide a comprehensive explanation of work to date, but rather to explain work undertaken to develop and appraise reasonable alternatives.
- 4.2 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the Plan, namely the allocation of land for housing, or alternative sites.
- 4.3 The DDNP has a housing target to identify land for 250 dwellings in the period up to 2038. The reasonable alternatives work undertaken through the SEA has therefore considered different options for delivering these requirements.

Why focus on sites?

- 4.4 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing development, given the following considerations:
 - DDNP objectives which seek to influence both the location and design of new residential development;
 - Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
 - The delivery of new homes is most likely to have a significant effect compared to other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

Structure of this part of the report

- 4.5 This part of the report is structured as follows:
 - **Chapter 5** - explains the process of establishing reasonable alternatives;
 - **Chapter 6** - presents the outcomes of appraising reasonable alternatives;
 - **Chapter 7** - explains reasons for selecting the preferred option, in light of the appraisal.

5. Establishing reasonable alternatives

Introduction

- 5.1 The aim here is to explain the process that led to the establishment of alternatives and thereby present “*an outline of the reasons for selecting the alternatives dealt with*”.⁸
- 5.2 Specifically, there is a need to explain the strategic parameters that have a bearing on the establishment of options (in relation to the level and distribution of growth) and the work that has been undertaken to date to examine site options (i.e. sites potentially in contention for allocation in the DDNP). These parameters are then drawn together in order to arrive at ‘reasonable alternatives’.

Level of growth

- 5.3 In **South Norfolk**, as previously identified in **Chapter 2**, 765 new homes are planned for in Diss in the period up to 2038. Most of this growth is committed (e.g. sites with planning permission, or sites which are allocated in an existing plan) development, including that identified through the existing JCS.
- 5.4 The committed development is inclusive of the following rolled over allocation sites from the JCS:
- DIS1: Land north of Vince’s Road, Diss
 - DIS2: Land off Park Road, Diss
 - DIS3: Land off Denmark Lane, Roydon
 - DIS6: Land behind the Thatchers Needle (mixed-use development)
 - DIS7: Feather Mills Site (mixed-use development)
 - DIS9: Land at Sandy Lane (north of Diss Business Park), Diss
 - GNLP0511: Land to the east of Norwich Road, north of Ransome Avenue, Scole
- 5.5 Further to the above, there is also outstanding commitments for; 150 homes at the ‘Frontier Agriculture’ site on Sandy Lane in Diss, and 18 homes and a village hub at the ‘Land west of Norwich Road’ in Scole.
- 5.6 Taking the above sites into consideration, GNLP Table 6 identifies the total number of homes anticipated to be delivered through new allocations in the GNLP, VCHAP, and DDNP. In this respect, Table 6 identifies a residual requirement for an additional 250 dwellings, the land for which is to be identified through the DDNP. More recently, the following site has also gained planning permission and will count towards meeting the identified housing requirement for 250 homes in Diss:
- Land north of Nelson Road, Diss; (extra care homes) contributing the equivalent of 10 dwellings

⁸ Schedule 2(8) of the SEA Regulations.

- 5.7 Diss continues to be identified as a Main Town in the settlement hierarchy, providing access to local services and facilities. South Norfolk Council have further advised that in addition to this target for the Diss and Roydon main built up area, there is an additional requirement for each of the three 'village clusters' in the Plan area; Burston, Scole and the remainder of Roydon, to deliver 25 dwellings each.
- 5.8 There is no requirement to identify additional homes within the parishes lying within **Mid Suffolk**, recognising that the residual need for 15 homes across these parishes has been met through the allocations of emerging JLP Policy LS01 in Oakley ('Land south of B1118' for 5 dwellings and 'Land north of B1118' for 10 dwellings). However, the DDNP can pursue additional allocations in the Mid Suffolk parishes which exceed requirements if they so wish, providing the sites are demonstrably viable and deliverable.
- 5.9 On this basis, the residual housing requirements to be met through allocations in the DDNP are as follows:
- 240 homes in Diss
 - 25 homes in Roydon
 - 25 homes in Burston
 - 25 homes in Scole
- 5.10 The DDNP Steering Group have identified further preferences to allocate additional land for development in Brome and Oakley which will exceed the identified strategic requirement by 9 homes and the allocations proposed within Scole exceed the required figure by an additional ten dwellings (delivering 35 homes in total).

Distribution of growth

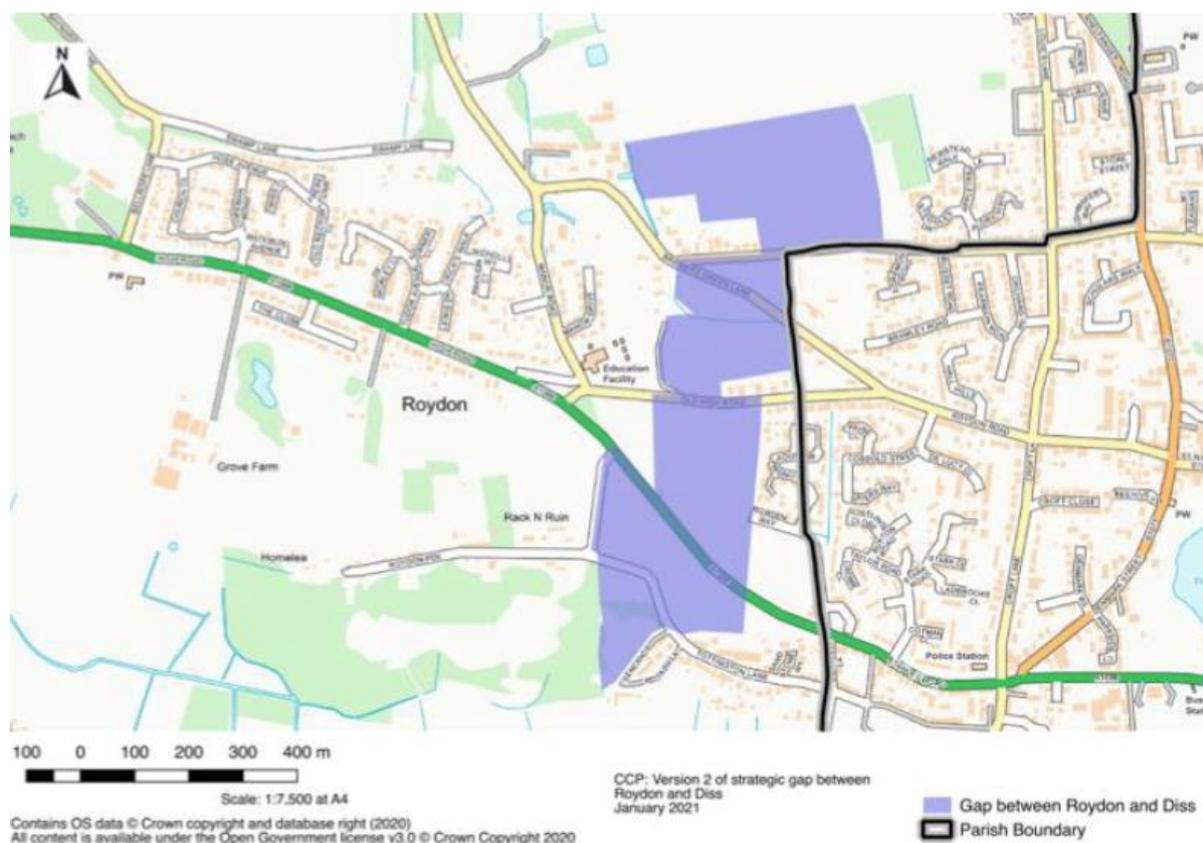
- 5.11 The evidence in relation to site options is underpinned by the Site Options and Assessment (SOA) work undertaken by AECOM on behalf of the group. This has sought to align with the evidence bases of the emerging GNLP and JLP, factoring in all sites identified by the Local Planning Authorities as well as the Town Council.
- 5.12 An initial Site Options Assessment (SOA) was completed in January 2020 which identified a total of 35 sites across the Plan area. These sites derive from the GNLP 'call for sites' and subsequent Housing and Economic Land Availability Assessment (HELAA) as well as sites that were locally identified by the DDNP Steering Group. The Steering Group then undertook a further 'call for sites' for the DDNP, which, supplemented by the emerging South Norfolk VCHAP work, identified an additional 17 potential sites for development in the Plan area. The additional 17 sites were assessed in an updated SOA (December 2020), which also undertook a review of the original 35 sites.
- 5.13 The updated SOA forms the basis for exploring sites through the SEA in 2021, as the most up-to-date evidence on all available sites in the DDNP area. The updated SOA identifies a total of 38 sites in the Plan area which are either suitable or potentially suitable for allocation in the DDNP. However, more recent events preclude the progression of a number of these sites as follows:

- Site 14 (Diss Rugby Club, Roydon), which was found to be potentially suitable, has been withdrawn by the landowner and is no longer available for development.
- Site DISS0002 ('The Entry') is also no longer available and is not expected to become available within the Plan period.
- GNLP0102 is the 'Frontier Agriculture' Site which is already committed to deliver 150 homes.
- GNLP2067 (Land south of Victoria Road) is discounted as an option for housing development on the basis that it is promoted for employment development at this stage.
- DIS2 (Land off Park Road) is a rolled over JCS allocation site in Diss.

5.14 In relation to the distribution of growth and the remaining site options in contention for allocation in the DDNP, each of the four settlements with identified housing growth requirements (see **Para 5.9**) are discussed in turn below.

Diss (240 homes)

- 5.15 Strategic growth in Diss should ultimately seek to maximise any development benefits, such as affordable housing contributions or new community infrastructure, which will inherently become more difficult to achieve in smaller scale growth in the surrounding settlements.
- 5.16 A key consideration for growth in Diss is that the DDNP is proposing a strategic gap between Diss and Roydon, which will maintain a degree of separation between the two distinct and different settlements. The strategic gap is identified in **Figure 5.1**.

Figure 5.1: Proposed strategic gap between Diss and Roydon

5.17 The available sites which are located within the proposed strategic gap (**Figure 5.1**) include GNL2104 in part (West of Boundary Farm on Shelfanger Road), GNL1038 (Brewers Green), and Site 8 (Brewers Green Lane). The areas of land falling wholly within the strategic gap (GNL1038 in Diss and Site 8 in Roydon) are not considered as suitable sites for progression through the SEA, given the direct conflict with the DDNP aims to avoid coalescence in this area. The remaining available sites in Diss are identified in **Tables 5.1** and depicted in **Figure 5.2**.

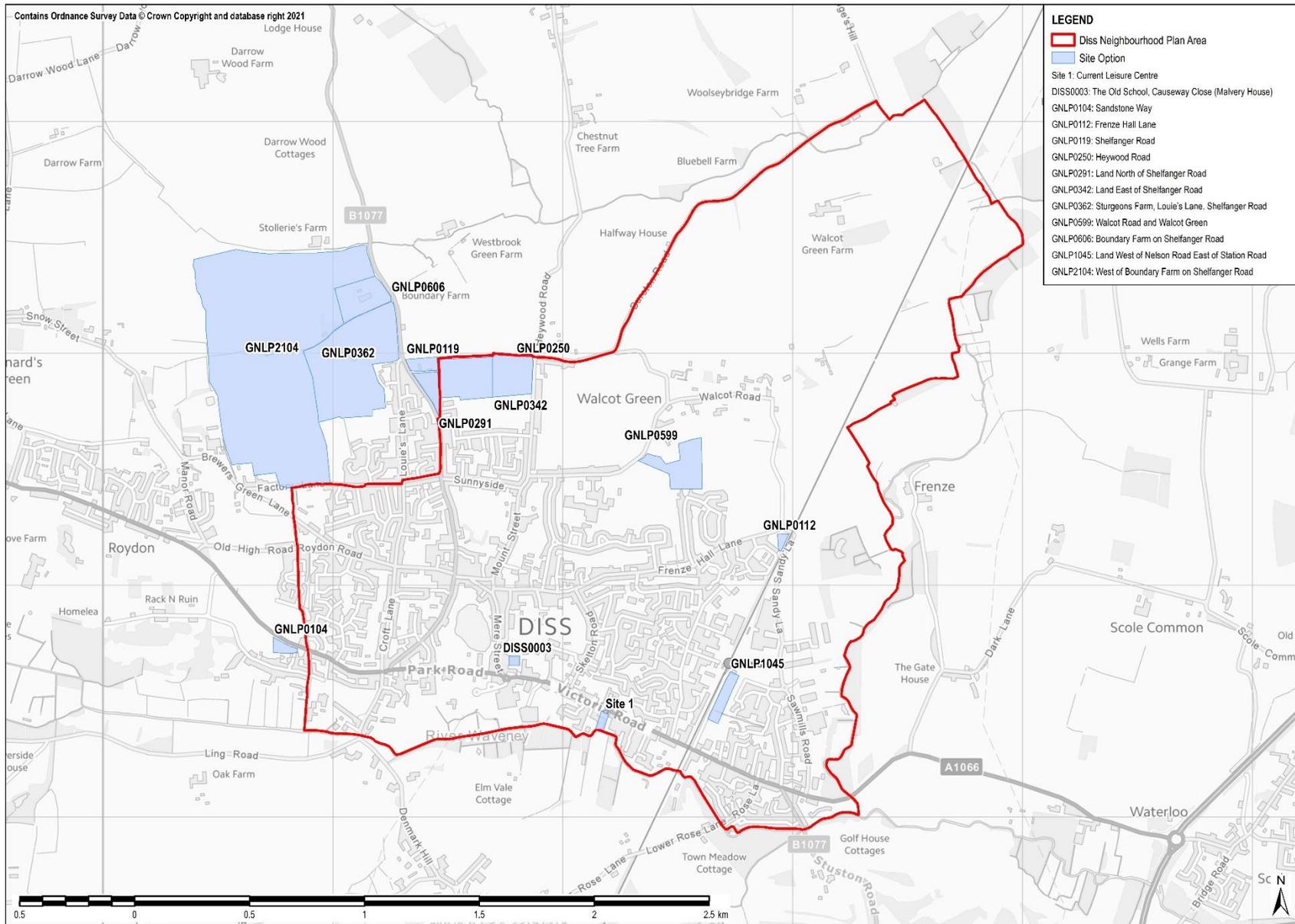
Table 5.1: Sites found suitable or potentially suitable in the updated SOA in Diss (South Norfolk)

Site reference	Site name	Settlement	Approx. site size (ha)	Potential capacity
Site 1	Current Leisure Centre	Diss	3.57	8
DISS0003	The Old School, Causeway Close (Malvery House)	Diss	0.18	4
GNLP0291	Land north of Shelfanger Road	Diss	0.93	33
GNLP0342	Land east of Shelfanger Road	Diss	4.76	100
GNLP0362	Sturgeons Farm, Louie's Lane, Shelfanger Road	Diss	13.81	413*
GNLP0119	Shelfanger Road	Diss	0.68	14
GNLP0250	Heywood Road	Diss	3.00	56
GNLP0606	Boundary Farm on Shelfanger Road	Diss	3.08	58*
GNLP2104	West of Boundary Farm on Shelfanger Road	Diss	50.51	631*

Site reference	Site name	Settlement	Approx. site size (ha)	Potential capacity
GNLP0599	Walcot Road and Walcot Green	Diss	3.29	62
GNLP0112	Frenze Hall Lane	Diss	0.23	9
GNLP1045	Land west of Nelson Road and east of Station Road	Diss	0.94	19
GNLP0104	Sandstone Way	Diss	0.48	10

**indicative figure for full site pre-mitigation, actual capacity likely to be lower*

Figure 5.2: Site options in Diss



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5.18 There are notable constraints to progression at some of these sites:

- Site GNLP0362 (**Sturgeons Farm**, Louie's Lane, Shelfanger Road) - the site will encroach upon Westbrook Green to some degree. Whilst the full extent of the site could accommodate the required level of growth, it is recognised that previous assessment of the site has concluded that no more than 100 homes would be suitable given the identified constraints in relation to biodiversity and the flood plain. On this basis, the site is considered through the SEA for its potential to contribute 100 homes to the housing requirement.
- Site GNLP0606 (**Boundary Farm** on Shelfanger Road) - most of the site falls outside of the Plan area and beyond the settlement area of Diss. Highways have raised concerns over whether suitable access could be provided. South Norfolk Council also raise concerns over the pressures development at this site would place on the A1066 (where known network capacity issues exist). For these reasons, the site is not considered as a suitable site to progress through the SEA.
- Site GNLP2104 (**West of Boundary Farm** on Shelfanger Road) - the large site falls partly within the identified strategic gap and extends beyond the Plan area in the north. Whilst the site could deliver in excess of housing requirements, development connected to the settlement at Factory Lane (within the strategic gap) would lead to direct coalescence with Roydon. Locating development at the northern extent of the site (within the Plan area) could connect with Shelfanger Road; however, it would need to be bought forward alongside GNLP0362 or GNLP0606 to effectively connect with the existing settlement area. The potential level of housing this would introduce in this area of countryside would be significantly in excess of the housing target. For these reasons, the site is not considered as a suitable site to progress through the SEA.
- Site GNLP0599 (**Walcot Road and Walcot Green**) - there is a current application for the development of 90 homes at this site which has been objected to by the Town Council (on grounds of access) and Norfolk Wildlife Trust (by virtue of the anticipated impacts on local biodiversity). There is a large pond in the middle of the site which has been shown to have a breeding population of Great Crested Newts, further evidence is presented for nine different bat species on-site. Whilst the site does not appear to be publicly accessible at this stage, it is being progressed for designation as Local Green Space in the DDNP. With a number of contentious issues arising at the site, it is considered in greater detail through the SEA, but at a lower capacity for 75 homes (based on the estimated developable area of the site)
- Site GNLP0112 (**Frenze Hall Lane**) - no potential safe access to the site can be identified at this stage. In the absence of a viable solution the site is not considered as a suitable site to progress through the SEA.

5.19 The potential for development benefits have also been identified through the Plan process, with a proposal to join up Sites GNLP0119 (Shelfanger Road), GNLP0291 (Land north of Shelfanger Road), GNLP0342 (Land east of Shelfanger Road) and GNLP0250 (Heywood Road). The new site, hereafter referred to as Site DDNP01 (**Land north of the Cemetery**), would deliver 200

homes and new cemetery expansion space gifted to the Town Council; as depicted in **Figure 5.3**.

Figure 5.3: Site DDNP01 and proposed cemetery extension (red line boundary)



5.20 With regards to the remaining sites:

- Site 1 (**Current Leisure Centre**) - this brownfield site is anticipated to become available in the plan period, with strategic plans to relocate the leisure centre in Diss and provide for extended facilities. The site is considered through the SEA for its potential to contribute a revised capacity of up to 20 homes.
- Site DISS0003 (**The Old School**, Causeway Close (Malvery House) - this brownfield and vacant site has been made available more recently. The existing building on site, although non-designated, holds local heritage values where restoration provides opportunities for long-term retention and maintenance.
- Site GNLP1045 (**Land west of Nelson Road and east of Station Road**) - this previously designated employment site is being reconsidered for its potential to contribute to housing supply. The site is predominantly brownfield land with excellent railway access; however, there is a potential for contaminated land that would require appropriate remediation prior to housing development.
- Site GNLP0104 (**Sandstone Way**) - is a small greenfield site and irregularly shaped. Despite connecting predominantly with the Diss settlement area, it falls within the Parish of Roydon.

5.21 Further to the above, there are recent planning applications submitted for two sites, which should ultimately be considered in the context of future growth in the settlement. One of these sites is the '**Parish Fields**'; a large area of accessible greenspace in the centre of the settlement, recognised as 'Important Local Green Space' in the adopted South North Site Specific Allocations and Policies Document. Housing development at this site has little community

support and the area is being progressed for designation as Local Green Space in the DDNP also. Given the sites obvious contribution to the recreational needs of existing residents, it is not considered reasonable. On this basis, the site is not progressed further through the SEA.

- 5.22 An application for the development of 73 retirement homes has been submitted at the land '**South of Thatcher's Needle**'. Development at this site will obviously target provisions for elderly residents only, with limited development benefits (e.g. no affordable units are anticipated given viability issues associated with maintenance charges). If approved, the site would ultimately supplement the provisions of the DDNP.
- 5.23 Additionally, the previously assessed site DIS7 ('**Former Norfolk Feather Company Site**'), found to be unavailable in the updated SOA, is known to have been recently sold to a housing developer, and a further application is anticipated at this site in due course. This site is predominantly brownfield land, and a locally preferred site for the future relocation of Diss Leisure Centre. It is recognised that development at this site is required to unlock access to the rolled over allocation site DIS2. Whilst the site is not allocated or considered through the DDNP at this stage, it is recognised as a preferred site for future employment or leisure development as opposed to housing development. On this basis it is not considered reasonable at this stage, and is not progressed further through the SEA.
- 5.24 Considering the above, a simple 'red/ amber/ green' (RAG) rating has been applied to the available sites in Diss, indicating their potential for consideration in the development of alternatives to meet the residual housing requirement; see **Table 5.2**. Red indicates that the site is not suitable to progress through the SEA, whereas green indicates a clear reason for progression, such as the prioritisation of brownfield land. Amber sites are those sites where potential issues have been identified but that are considered further through the SEA in the formulation of alternatives.

Table 5.2: SEA RAG rating of sites in Diss

Site reference	Site name	Revised capacity	RAG rating
Site 1	Current Leisure Centre	20	
DISS0003	The Old School, Causeway Close (Malvery House)	10	
DDNP01 (formed of GNLP0119, GNLP0291, GNLP0342, and GNLP0250)	Land north of the Cemetery	200	
GNLP0362	Sturgeons Farm, Louie's Lane, Shelfanger Road	100	
GNLP0606	Boundary Farm on Shelfanger Road	-	
GNLP2104	West of Boundary Farm on Shelfanger Road	-	
GNLP0599	Walcot Road and Walcot Green	75	
GNLP0112	Frenze Hall Lane	-	
GNLP1045	Land west of Nelson Road and east of Station Road	25	
GNLP0104	Sandstone Way	10	

Roydon (25 homes)

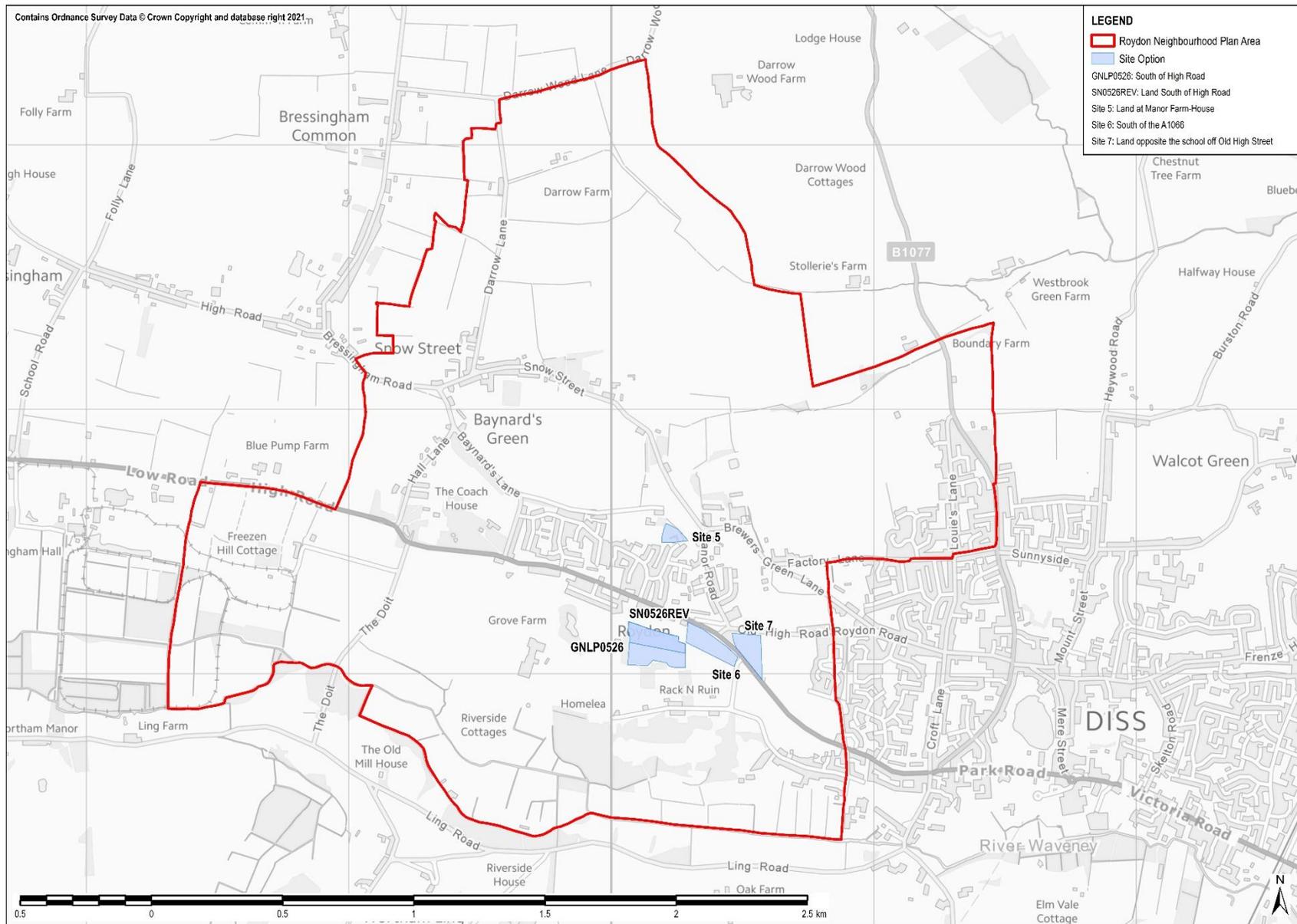
5.25 A variety of sites also exist in Roydon to deliver against the housing requirement for an additional 25 homes; these are identified in **Table 5.3** and **Figure 5.4**.

Table 5.3: Sites found suitable or potentially suitable in the updated SOA in Roydon (South Norfolk)

Site reference	Site name	Settlement	Approx. site size (ha)	Potential capacity
Site 5	Land at Manor Farm-House	Roydon	0.45	10
Site 6	South of the A1066	Roydon	1.15	24
Site 7	Land opposite the school off Old High Street	Roydon	1.2	25
SN0526REV	Land south of High Road	Roydon	1.0	25
GNLP0526	South of High Road	Roydon	2.94	89*

**indicative figure for full site pre-mitigation, actual capacity likely to be lower*

Figure 5.4: Site options in Roydon



5.26 In terms of the available sites:

- **Site 5 (Land at Manor Farm House)** - is a small site which would need to be considered in combination with another site to deliver fully against the housing requirement. It is part brownfield and part greenfield and contains a designated Grade II Listed Building. The heritage constraints ultimately mean that the potential housing numbers that could be delivered on site remain low and uncertain overall in the absence of a detailed planning application. On this basis, and in the context of the remaining site options in Roydon, the site is not considered reasonable and is not progressed further through the SEA.
- Both Sites 6 (**South of the A1066**) and 7 (**Land opposite the school off Old High Street**) - are greenfield sites lying adjacent to the strategic open gap between Diss and Roydon and in a sensitive landscape area. Both sites are progressed for further consideration through the SEA in the formulation of alternatives.
- Site SN0526REV (**Land south of High Road**) - is a revised submission and reduced site boundary of the larger greenfield site option GNLP0526 (**South of High Road**), which could accommodate the required 25 homes at the settlement edge. On this basis, the larger site option (GNLP0526) is not considered reasonable for the purposes of the SEA, but the revised site is.

5.27 Considering the above, a simple 'red/ amber/ green' (RAG) rating has been applied to the available sites in Roydon, indicating their potential for consideration in the development of alternatives to meet the residual housing requirement; see **Table 5.4**. Red indicates that the site is not suitable to progress through the SEA, whereas green indicates a clear reason for progression, such as the prioritisation of brownfield land. Amber sites are those sites where potential issues have been identified but that are considered further through the SEA in the formulation of alternatives.

Table 5.4: SEA RAG rating of sites in Roydon

Site reference	Site name	Revised capacity	RAG rating
Site 5	Land at Manor Farm-House	-	Red
Site 6	South of the A1066	24	Amber
Site 7	Land opposite the school off Old High Street	25	Amber
SN0526REV	Land south of High Road	25	Amber
GNLP0526	South of High Road	-	Red

Burston (25 homes)

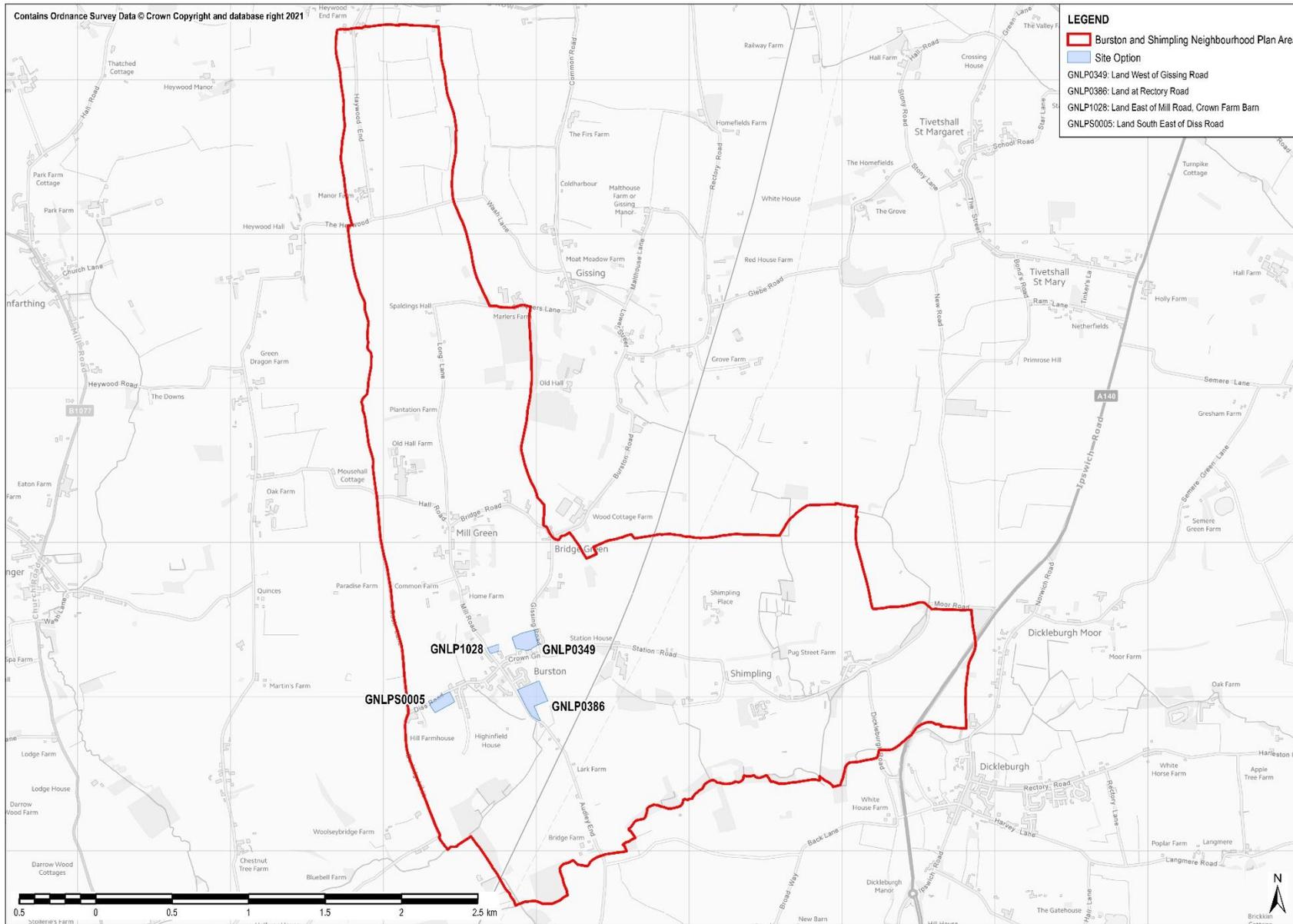
5.28 The available sites in Burston are identified in **Table 5.5** and **Figure 5.5**.

Table 5.5: Sites found suitable or potentially suitable in the updated SOA in Burston (South Norfolk)

Site reference	Site name	Settlement	Site size (ha)	Potential capacity
GNLPS0005	Land south east of Diss Road	Burston	0.1	2
GNL0349	Land west of Gissing Road	Burston	1.54	40-45*
GNL1028	Land east of Mill Road, Crown Farm Barn	Burston	0.3	5
GNL0386	Land at Rectory Road	Burston	2.44	46*

**indicative figure for full site pre-mitigation, actual capacity likely to be lower*

Figure 5.5: Site options in Burston



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5.29 With regards to the available sites:

- Site GNLPS0005 (**Land south east of Diss Road**) - the site is a significantly small site capable of delivering only 2 homes. Any development at this site is considered to constitute additional 'windfall' development and the site is not progressed for the purposes of the SEA.
- Site GNLP0349 (**Land west of Gissing Road**) - at this greenfield site the SOA has identified notable constraints in relation access and road infrastructure requirements, biodiversity, heritage, and the provision of sewerage infrastructure. As a result, the SOA recommends that the site is only progressed in part with a reduced capacity. With the SOA recommendations in mind and for the purposes of the SEA, half capacity at the site has been progressed for consideration in the formulation of alternatives.
- Site GNLP1028 (**Land east of Mill Road, Crown Farm Barn**) - the site is a small-scale site that is only capable of delivering up to 5 homes. Whilst the site is progressed for consideration in formulation of alternatives, it is recognised that the site would need to be considered in conjunction with another site to meet the residual housing requirement.
- Site GNLP0386 (**Land at Rectory Road**) - the large greenfield site if developed in full would lead to coalescence with Audley End. There are also notable access, biodiversity and heritage constraints. As a result, the SOA only recommends allocation in part at this site, focused in the north eastern end of the site adjoining the settlement area, with a reduced capacity (half capacity suggested for the purposes of the SEA).

5.30 Considering the above, a simple 'red/ amber/ green' (RAG) rating has been applied to the available sites in Roydon, indicating their potential for consideration in the development of alternatives to meet the residual housing requirement; see **Table 5.6**. Red indicates that the site is not suitable to progress through the SEA, whereas green indicates a clear reason for progression, such as the prioritisation of brownfield land. Amber sites are those sites where potential issues have been identified but that are considered further through the SEA in the formulation of alternatives.

Table 5.6: SEA RAG rating of sites in Burston

Site reference	Site name	Revised capacity	RAG rating
GNLPS0005	Land south east of Diss Road	-	Red
GNLP0349	Land west of Gissing Road	20	Amber
GNLP1028	Land east of Mill Road, Crown Farm Barn	5	Amber
GNLP0386	Land at Rectory Road	23	Amber

Scole (25 homes)

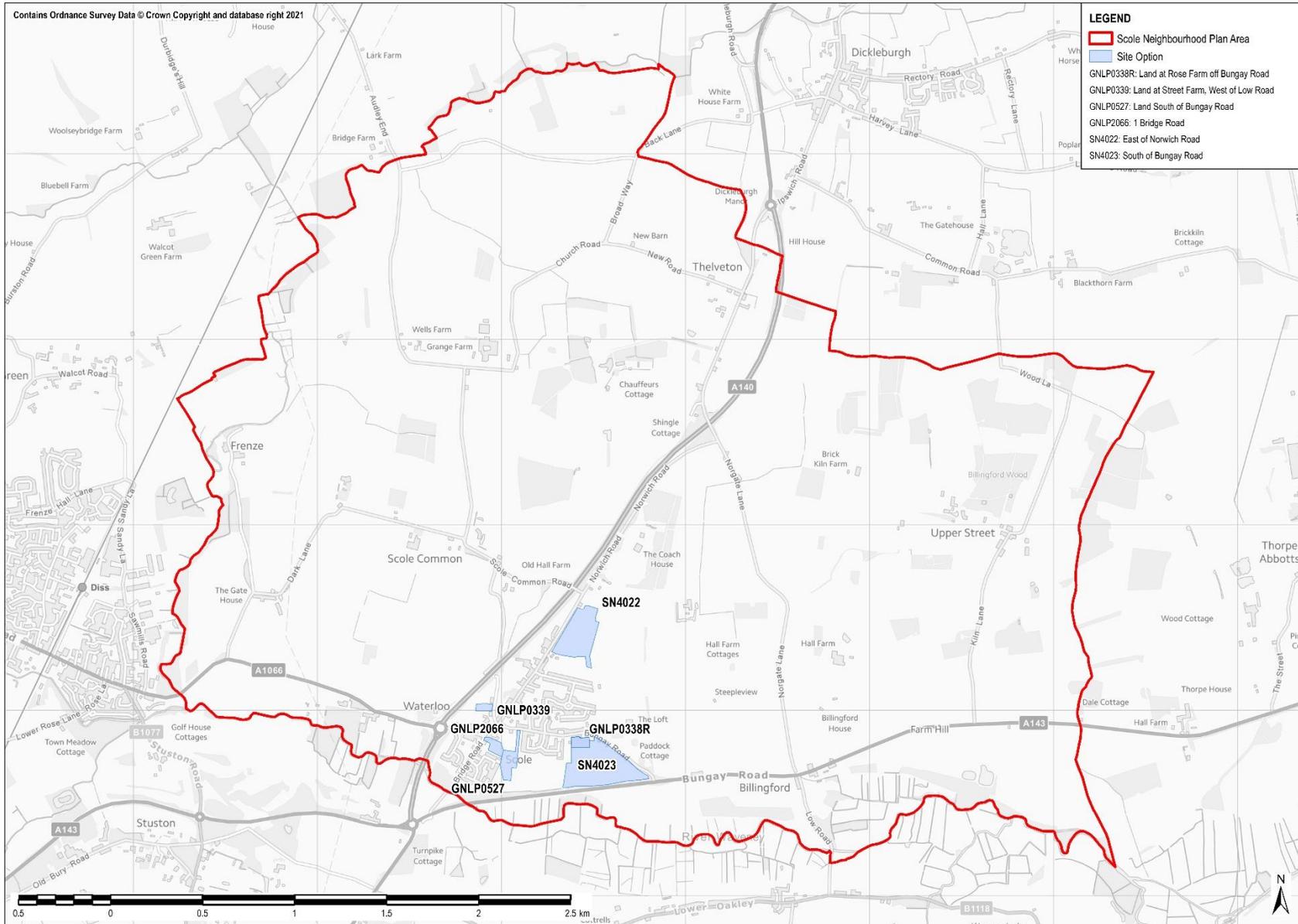
5.31 The site options for Scole are identified in **Table 5.7** and **Figure 5.6**.

Table 5.7: Sites found suitable or potentially suitable in the updated SOA in Scole (South Norfolk)

Site reference	Site name	Settlement	Approx Site size (ha)	Potential capacity
SN4022	East of Norwich Road	Scole	5.2	130
SN4023	South of Bungay Road	Scole	8.22	206
GNLP0338R	Land at Rose Farm off Bungay Road	Scole	0.59	10-14*
GNLP0527	Land south of Bungay Road	Scole	1.75	53*
GNLP0339	Land at Street Farm, west of Low Road	Scole	0.34	15
GNLP2066	1 Bridge Road	Scole	0.5	11

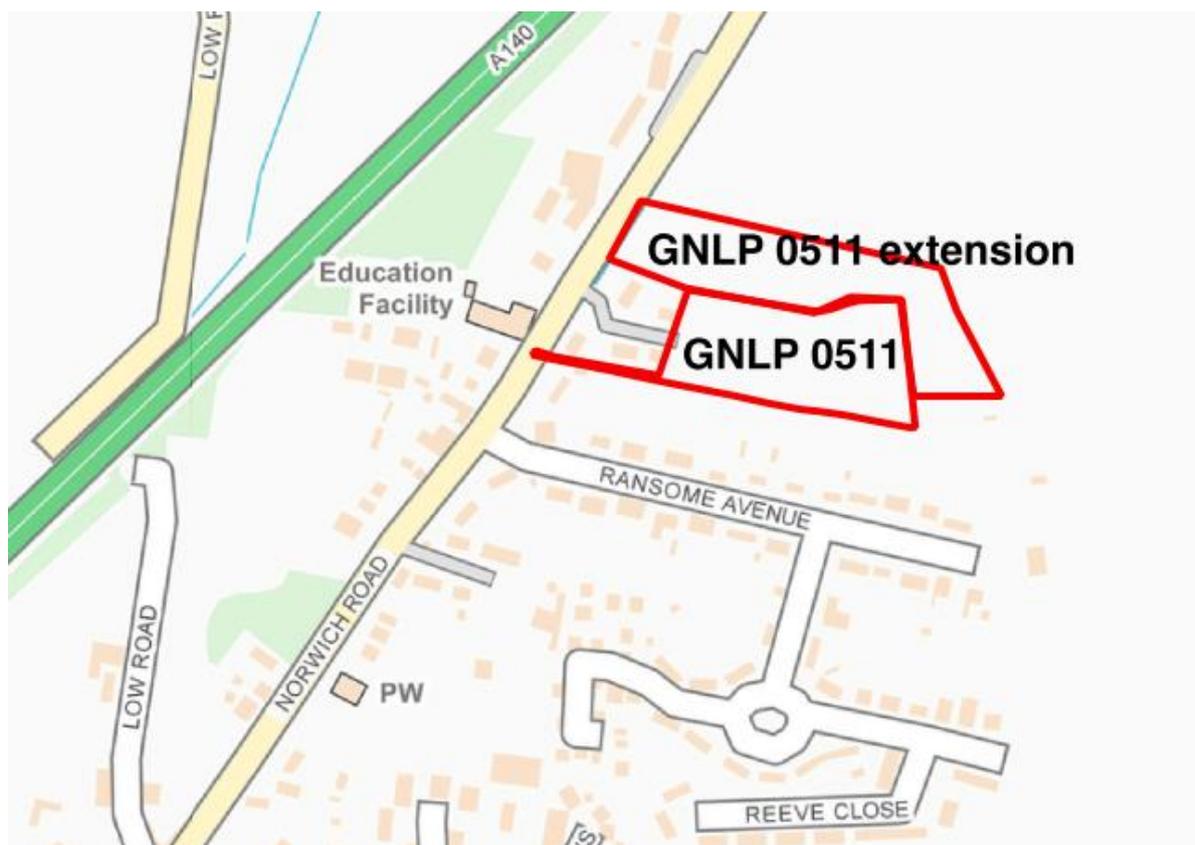
**indicative figure for full site pre-mitigation, actual capacity likely to be lower*

Figure 5.6: Site options in Scole



5.32 With regards to the available sites:

- Site SN4022 (**East of Norwich Road**) - the site would deliver significant growth in the north of the settlement impacting upon the character of the settlement, and on this basis, the SOA has recommended only partial allocation of the site with a reduced capacity. With the SOA recommendations in mind and for the purposes of the SEA, half capacity at the site has been progressed for consideration in the formulation of alternatives. Furthermore, an extension to the rolled over allocation site GNLP0511 (Land to the east of Norwich Road, north of Ransome Avenue) is being considered to accommodate suitable access (see **Figure 5.7**), this extension land is the southern extent of Site SN4022.
- Site SN4023 (**South of Bungay Road**) - development at this site would significantly extend the settlement south-east within the 'River Valleys Extents'; a sensitive landscape area. Like Site SN4022, the likely impacts upon landscape character mean that the site is only considered suitable for allocation in part with a reduced capacity. Site GNLP0338R (**Land at Rose Farm off Bungay Road**) is a revised submission for the site, which includes the farmhouse and areas of previously developed land. The DDNP is also exploring a slightly higher capacity at this site, for 20 dwellings. On this basis, the revised site is progressed for the purposes of the SEA, whilst the larger site is not considered reasonable.
- Site GNLP0527 (**Land south of Bungay Road**) - the SOA recommends partial allocation of the site to reduce the impacts on settlement character. With the SOA recommendations in mind and for the purposes of the SEA, half capacity at the site has been progressed for consideration in the formulation of alternatives. It is also recognised that access to the site is less than ideal.
- Sites GNLP0339 (**Land at Street Farm, west of Low Road**) and GNLP2066 (**1 Bridge Road**) - are small greenfield sites that would need to be considered in combination to meet the housing target. Both sites are progressed for consideration in the formulation of alternatives.

Figure 5.7: Potential boundary extension at GNLP0511

5.33 A further option has been identified at **'The Former Scole Engineering Site'** for 6 homes. The Former Scole Engineering Site has not been subject to any prior assessment, as it has only recently been identified. The boundary of the brownfield site is depicted in **Figure 5.6**.

5.34 Considering the above, a simple 'red/ amber/ green' (RAG) rating has been applied to the available sites in Diss, indicating their potential for consideration in the development of alternatives to meet the residual housing requirement; see **Table 5.8**. Red indicates that the site is not suitable to progress through the SEA, whereas green indicates a clear reason for progression, such as the prioritisation of brownfield land. Amber sites are those sites where potential issues have been identified but that are considered further through the SEA in the formulation of alternatives.

Table 5.8: SEA RAG rating of sites in Scole

Site reference	Site name	Revised capacity	RAG rating
SN4022	East of Norwich Road	65	Amber
SN4023	South of Bungay Road	-	Red
GNLP0338R	Land at Rose Farm off Bungay Road	20	Amber
GNLP0527	Land south of Bungay Road	26	Amber
GNLP0339	Land at Street Farm, west of Low Road	15	Amber
GNLP2066	1 Bridge Road	11	Amber
-	The Former Scole Engineering Site	6	Green

Brome & Oakley

5.35 As identified previously, the emerging JLP proposed allocation sites will meet the housing requirements for Brome and Oakley, and these sites will also be allocated in the DDNP ('Land south of B1118' for 5 dwellings and 'Land north of B1118' for 10 dwellings). Only one additional site was identified in the SOA as suitable or potentially suitable, 'Site 12d Brome'. This site is also being proposed as an allocation in the DDNP for an additional 9 homes; to deliver 24 homes in total over the plan period. No further suitable or potentially suitable options exist at this stage in Brome and Oakley.

Establishing reasonable alternatives

5.36 Considering the strategic parameters and site options discussed above, options were developed for each of the settlements with a residual housing requirement. The four settlements and the options are discussed in turn below.

Diss (240 homes)

5.37 The existing commitments at Diss (DIS1, DIS2, DIS3, the 'Frontier Agriculture' site on Sandy Lane and Land north of Nelson Road) are considered 'constants' in any future growth scenario.

5.38 The DDNP preferred option (**Option 1**) (i.e. the preferred allocations for the DDNP) is formed of the following sites:

- DDNP01 delivering 200 homes and a new cemetery extension
- DISS0003 delivering approximately 10 homes
- Site 1 delivering approximately 20 homes
- GNLP1045 delivering approximately 25 homes

5.39 The preferred option for growth in Diss slightly exceeds the residual housing target for 240 homes, delivering 255 homes in total and providing an element of flexibility given the uncertainty around delivery at Site 1.

5.40 As brownfield sites, Site 1, Site DISS0003 and Site GNLP1045 are prioritised in any future growth scenario. An alternative is explored to Site DDNP01, which could consist of growth at Sites GNLP0362, GNLP0104 and GNLP0599 (**Option 2**); which combined, deliver the target level of growth. The options are presented in **Table 5.2**.

Table 5.9: Alternatives for Diss

Site reference	Option 1 (preferred option)	Option 2
Rolled over allocations and committed development		
DIS1: Land north of Vince's Road	35	35
DIS2: Land off Park Road	10	10
DIS3: Land off Denmark Lane	42	42
The 'Frontier Agriculture' site on Sandy Lane	150	150
Land north of Nelson Road (permitted site)	10	10
New allocations		
DISS0003: The Old School, Causeway Close (Malvery House)	10	10
Site 1: Current Leisure Centre	20	20
GNLP1045: Land west of Nelson Road and east of Station Road	25	25
DDNP01: Land north of the Cemetery, west of Heywood Road and east of Shelfanger Road	200	-
GNLP0362: Sturgeons Farm, Louie's Lane, Shelfanger Road	-	100
GNLP0104: Sandstone Way	-	10
GNLP0599: Walcot Green	-	75
Total homes (new allocations)	255	240

Roydon (25 homes)

5.41 The preferred site for allocation in Roydon is Site 7 (**Option 1**), with identified alternative options at Site 6 (**Option 2**) and SN0526REV (**Option 3**). There are constraints to development under each of the options and it is recognised that allocation of Site 6 would lead to a shortfall of one dwelling. The options are presented in **Table 5.3**.

Table 5.10: Alternatives for Roydon

Site reference	Option 1 (preferred option)	Option 2	Option 3
Site 6: South of the A1066	-	24	-
Site 7: Land opposite the school off Old High Street	25	-	-
SN0526REV: Land south of High Road	-	-	25
Total homes	25	24	25

Burston (25 homes)

5.42 The preferred option for Burston (**Option 1**) allocates two sites for development at GNLP0349 and GNLP1028 to deliver 25 homes combined. The only other available site is GNLP0386 which could provide an alternative (**Option 2**) to GNLP0349 albeit delivering a slightly higher number of homes. There are notable constraints to development at both GNLP0386 and GNLP0349. The options are identified in **Table 5.4**.

Table 5.11: Alternatives for Burston

Site reference	Option 1 (preferred option)	Option 2
GNLP0349: Land west of Gissing Road	20	-
GNLP1028: Land east of Mill Road, Crown Farm Barn	5	5
GNLP0386: Land at Rectory Road	-	23
Total homes	25	28

Scole (25 homes)

5.43 The existing commitments at Scole (GNLP0511 Land east of Norwich Road and 'Land west of Norwich Road') are considered 'constants' in any future growth scenario. In meeting the need for an additional 25 homes, The Former Scole Engineering Site is also considered a 'constant' being prioritising in any future growth scenario given the nature of the site as previously developed land.

5.44 A number of options exist for Scole. **Option 1** is established to deliver against the outstanding need for 19 homes is at GNLP0338R (with the capacity for 20 homes). A reduced capacity at GNLP0527 (**Option 2**) could provide a direct alternative site option to deliver 26 homes, and it is also recognised that the two available small sites combined could also deliver 26 homes (**Option 3**).

5.45 The potential to exceed the housing target also exists, with an alternative for higher growth identified at SN4022 (**Option 4**); it is also noted that this option could be reduced in scale to meet the identified needs.

Table 5.12: Alternatives for Scole

Site reference	Option 1	Option 2	Option 3	Option 4
Rolled over allocations and committed development				
GNLP0511: Land east of Norwich Road	25	25	25	25
Land west of Norwich Road in Scole	18	18	18	18
New allocations				
The Former Scole Engineering Site	6	6	6	6
GNLP0338R: Land at Rose Farm off Bungay Road	25	-	-	-
GNLP0527: Land south of Bungay Road	-	26	-	-
GNLP0339: Land at Street Farm, west of Low Road	-	-	15	-
GNLP2066: 1 Bridge Road	-	-	11	-
SN4022: East of Norwich Road	-	-	-	65
Total homes (new allocations)	31	32	32	65

6. Assessing reasonable alternatives

6.1 This chapter provides the assessment of the four sets of alternative options (at Diss, Roydon, Burston and Scole) established in the previous chapter.

Methodology

- 6.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see **Table 3.1**) as a methodological framework. **Green** is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. Minor effects are also identified, with **light green** indicating minor positive effects and **amber** indicating minor negative effects. Where appropriate neutral effects (no colour), or uncertainty will also be noted. Uncertainty is noted with **grey** shading.
- 6.3 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.
- 6.4 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate **a rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best.
- 6.5 Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations.⁹ So, for example, account is taken of the duration, frequency and reversibility of effects.

Assessment of reasonable alternatives for Diss

- 6.6 The following options have been established for Diss:
- **Option 1:** DISS0003 (The Old School, Causeway Close), Site 1 (Current Leisure Centre), GNLP1045 (Land west of Nelson Road and east of Station Road) and DDNP01 (Land north of the Cemetery) delivering a total of 255 homes.
 - **Option 2:** DISS0003 (The Old School, Causeway Close), Site 1 (Current Leisure Centre), GNLP1045 (Land west of Nelson Road and east of Station Road), GNLP0362 (Sturgeons Farm), GNLP0104 (Sandstone Way) and GNLP0599 (Walcot Green) delivering a total of 240 homes.

⁹ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Biodiversity

Biodiversity	Option 1	Option 2
Rank and likely effects	=	=

6.7 It is a challenge to differentiate the alternatives with confidence, as all four of the sites that are a 'variable' are seemingly associated with degree of constraint. Also, there are evidence-base limitations, in that detailed evidence has been gathered for one of the four sites as part of a current planning application, whilst equivalent evidence is not available for the other three sites. Having made these initial remarks, the following bullets consider the four sites in turn:

- North of the Cemetery (Option 1) - is constrained primarily on account of the adjacent cemetery, which is designated as a County Wildlife Site (CWS). The southern boundary of the site, which separates it from the cemetery, seemingly comprises a mature hedgerow/tree belt, and the eastern half of this boundary may be particularly sensitive, as the eastern half of the cemetery is the older part (shown on 1885 OS map). The proposed scheme would involve extending the cemetery northwards into the site, and it is fair to assume that there would be careful and sympathetic treatment of mature trees/vegetation; however, concerns remain.

Also, a secondary concern relates to the western part of the site, which comprises a series of seemingly mature hedgerows (shown as field boundaries on the 1885 OS map, and with some trees marked), as well as a 'scrubby' parcel of land. No concept masterplan is available to indicate areas of land that would be left as open space, or the approach taken to minimising loss of hedgerows/tree belts, mindful of the need for the site to deliver a new link road.

On the plus side, it is noted that there is seemingly little or no mature hedgerow boundary along the northern and eastern edges of the site.

- Sturgeon's Farm (Option 2) - there are several small patches of woodland adjacent and nearby, including an adjacent small patch shown (at magic.gov.uk) to comprise priority habitat.
- Walcot Road (Option 2) - there is no designated or priority habitat in the direct vicinity of the site; however, work undertaken as part of a current planning application has served to highlight a range of issues, including relating to great crested newts (there is an onsite population associated with a large pond, and there is a network of ponds nearby) and bats (populations have been recorded, potentially associated with the mature oak within the site and/or the species rich hedgerow along the eastern edge of the site) amongst other things.
- Sandstone Way (Option 2) - there is a need to consider its proximity to Roydon Fen, which is a Local Nature Reserve (LNR) within the Waveney Valley, and which links closely to Wortham Ling SSSI to the south.

6.8 Overall, it is not possible to differentiate the reasonable alternatives with any confidence, and there is a need to highlight a notable degree of risk under both alternatives.

Climate change

Climate change	Option 1	Option 2
Rank and likely effects	=	=

- 6.9 Both climate change mitigation and adaptation are relevant considerations. In respect of mitigation, a primary consideration is the need to minimise per capita emissions from transport by minimising the need to travel and supporting a modal shift away from car dependency, i.e. by supporting a shift to ‘sustainable’ modes of transport (walking, cycling, public transport, electric vehicles). In this respect, the first point to note is that the three larger sites in question are all a similar distance from the town centre, although the site to the northeast (Walcot Road, which features in Option 2) is closer to the rail station, and also adjacent to the secondary school. A second consideration is walking/cycling infrastructure, and, in this respect, there is potentially concern with Walcot Road (Option 2), particularly if it should be necessary for the primary point of access to be from Walcot Road itself, which is a rural lane with no footway (albeit only for a short stretch, between the site and the secondary school), which was the proposal as part of the planning application submitted in 2019, although the proposal was subsequently amended with access proposed from Walcot Rise. Finally, in respect of bus connectivity, it is a challenge to differentiate between the three larger site options with confidence, but it is fair to highlight Walcot Road as having least potential for good bus connectivity, noting distance from either an A road or a B road. N.B. see further discussion below, under ‘Transport and movement’.
- 6.10 Another consideration is the need to support large scale schemes that lead to economies of scale that can, in turn, enable delivery of low carbon infrastructure (e.g. a ground source heat network; or solar PV with battery storage) and/or high standards of sustainable design and construction, such that the development can achieve net zero or, at least, CO₂ emissions standards that exceed the requirements of Building Regulations. In this respect, it is fair to highlight that there could be a degree of opportunity associated with the largest of the site options in question, namely North of the Cemetery, which features in Option 1; however, there is little certainty, including as the scheme would need to deliver an extension to the cemetery and a new link road, both of which will be associated with costs to the developer. With regards to Walcot Road, the proposal within the current planning application (for up to 90 homes) is to build the new homes only to the standard set out in Building Regulations.¹⁰
- 6.11 With regards to climate change adaptation a key consideration is surface water flood risk, noting that none of the sites in question are affected by onsite fluvial flood risk, and there is no potential to differentiate between the sites in respect of wider matters relating to climate change adaptation, e.g. the need to minimise overheating risk. The primary point to note is that the surface water flood risk zone constrains Sturgeon's Farm (Option 2); however, this is predominantly the ‘low’ risk zone, hence it is not clear that there would be a

¹⁰ The submitted Social, Economic and Environmental Benefits Statement (November 2020) states: “The dwellings would be built to modern building regulations requirements and therefore provide excellent thermal performance through insulation and heating systems, helping to ensure the proposal is contributing towards carbon savings and the move to a low carbon economy contributing towards the climate change agenda.” However, there is a need to question this statement, as building homes to meet Building Regulations is the ‘do minimum’, or ‘baseline’ requirement, and hence does not deliver carbon savings.

need to leave areas within the risk zone undeveloped. A final point to note is that Sandstone Way - a small site (10 homes) within Option 2 - is located near to the floodplain of the River Waveney, upstream of properties in Diss that are affected by fluvial flood risk, hence there could feasibly be a need to consider increased surface water run-off leading to increased downstream flood risk; however, there is no reason to suggest this is a significant concern.

6.12 In conclusion, there is not considered to be any potential to confidently differentiate between the alternatives in respect of either climate change mitigation or adaptation. With regards to the significance of effects, it is appropriate to identify the likelihood of minor negative effects under all of the options considered. Whilst, on the one hand, climate change mitigation is a global issue, such that local actions can only have a limited effect, on the other hand, there is a nationally declared climate emergency and a legally enshrined 2050 net zero target date and decarbonisation trajectory (78% reduction by 2035, against a 1990 baseline) and, as explained within the GNLP (2021): *“Norfolk County Council has adopted a target of achieving net zero carbon emissions by 2030 for council owned land and buildings and for travel. In addition, they will work towards carbon neutrality for the county, also by 2030.”* The 2030 carbon neutrality target is very stretching, hence there will be a need for further work to ensure that decarbonisation opportunities are being fully realised through DDNP spatial strategy and site selection; in particular at the strategic scale allocation site.

Landscape

Landscape	Option 1	Option 2
Rank and likely effects	1	2

6.13 Diss is strongly associated with a ridge of raised land to the north of the Waveney Valley and as such, there is a strong argument for containing the extent of the town within the Waveney valley, and avoiding expansion downhill to the north. On this basis, there is particular concern with Sturgeon’s Farm, which would deliver around 100 homes under Option 2, and there is also potentially a degree of concern regarding North of the Cemetery, which would deliver 200 homes under Option 1. In contrast, Walcot Road, which would deliver around 75 homes under Option 2, is arguably better contained within the river valley landscape, although this is fairly marginal, and the corollary is that the site is uphill of existing properties to the south. The following are further site-specific considerations:

- North of the Cemetery (Option 1) – a benefit of the site, from a landscape perspective, is that only one of its four sides is open to the wide countryside. However, there is a need to consider the risk of impacts to long distance views northwards from the cemetery, impacts to the bridleway passing through the site and views into the site from the adjacent footpath.
- Sturgeon’s Farm (Option 2) – the site is open to the wider landscape on two of its four sides, and there is a need to consider views into the site from the adjacent footpath.
- Walcot Road (Option 2) – much of the site boundary is well contained by existing built form; however, development would erode the narrow

landscape gap between Diss and Walcot Green, as potentially experienced by (some) motorists and cyclists travelling along Walcot Rd. There is also a suggestion that development could serve to soften the existing unattractive 'hard edge' to Diss at Walcot Rise / Falcon Avenue / Peregrine Close; however, it is not clear that this is necessarily an issue/opportunity, given very limited public views across the site.

- Sandstone Way (Option 2) – the site is well contained by built form and the A1066, and it is difficult to suggest that development would erode the landscape gap between Diss and Roydon to any significant extent, noting the committed housing site adjacent to the north of the A1066. However, the site is located adjacent to a long-distance footpath that links Diss to a range of destinations along the Waveney valley.

6.14 In conclusion, Option 1 is judged to be the preferable option on balance. Significant negative effects are not predicted, given limited or no risk to a locally designated landscape. With constraints identified across the sites and an overall loss of greenfield land at the settlement edge under either option, minor long-term negative effects are anticipated.

Historic environment

Historic environment	Option 1	Option 2
Rank and likely effects	1	2

6.15 It is judged appropriate to highlight Option 2 as performing relatively poorly on account of heritage issues which have been examined closely through the current planning application for up to 90 homes at Walcot Road, and the latest situation is that there is some disagreement between specialists regarding the significance of the constraint. However, for the purposes of this appraisal, it is fair to highlight Walcot Road as relatively constrained on account of the site comprising something of a landscape gap between the edge of Diss and Walcot Green, which is a historic settlement associated with a loose cluster of five grade 2 listed buildings, albeit without a designated conservation area and with a notable detracting feature, in the form of the industrial uses at Walcot Hall Farm.¹¹ The likelihood of archaeological constraint is also of note, albeit it is typically possible to address archaeology through the development process (at a cost). This cost is also likely to apply to Sandstone Way (Option 2) as it contains an identified 'Archaeology Area' where multi-period finds have been recorded including probable Iron Age defended settlement.¹²

6.16 With regards to North of the Cemetery, the cemetery itself is a locally important heritage asset, and there is a concern regarding housing impacting on the rural setting of the cemetery (including view across the river valley to the north). The site also contains the non-designated building; Royal Observer Corps. Post. Appropriate consideration would need to be given to incorporation of the building into any scheme. All sites are also considered constrained in respect of traffic through Diss Conservation Area.

¹¹ A report on 'Heritage Matters' submitted by the planning applicant in December 2019 state that "Walcot Green is not an adopted Conservation Area and as such it is not a heritage asset." However, it is not clear that this is the case, noting paragraph 184 of the NPPF, which explains "Heritage assets range from sites and buildings of local historic value to those of the highest significance... which are internationally recognised to be of Outstanding Universal Value."

¹² Norfolk Historic Environment Record [online] <http://www.heritage.norfolk.gov.uk/simple-search>

6.17 In conclusion, both Options have notable constraints in relation to the historic environment, with the significance of the constraints under debate under Option 2. At this stage, the options are not easily differentiated; recognising the uncertainty involved until detailed proposals and schemes can be identified alongside proposed mitigation measures. It is not clear that either Option would lead to significant negative effects (also noting the three small allocations that are 'constants' under both Options 1 and 2). Focusing on Walcot Road, it is noted that the current planning application relates to a proposal to deliver up to 90 homes, whilst the assumption for the purposes of this current appraisal is a less dense scheme of perhaps 75 homes.

Land, soil and water resources

Land, soil and water resources	Option 1	Option 2
Rank and likely effects	=	=

6.18 The great majority of agricultural land surrounding Diss is shown to be 'grade 3' quality land by the nationally available dataset, which is very low resolution and does not differentiate between grade 3a (which is classed as best and most versatile) and grade 3b (which is not classed as best and most versatile). The only lower grade agricultural land is found to the south of the town, associated with the river valley. None of the agricultural land surrounding Diss has been surveyed in detail.

6.19 A second consideration is the extent to which the sites in question are likely to support agricultural uses. In this respect, it seems clear that there is little or no potential for agricultural use of Sandstone Way, given its size, and there is also something of a question mark regarding the potential for effective agricultural operations on the Walcot Road site, noting the proposal to designate it as Local Green Space.

6.20 In conclusion, whilst there is some reason to suggest that there could be marginally more loss of productive agricultural land under Option 1, any difference is very slim and uncertain, hence the alternatives are judged to perform on a par. It is appropriate to flag an uncertain risk of significant negative effects, given that the agricultural land in question has not been surveyed in detail.

Population and communities

Population and communities	Option 1	Option 2
Rank and likely effects	1	2

6.21 A key consideration is in respect of meeting housing needs, in which respect Option 2 gives rise to a notable degree of concern, as it is a lower growth option. In comparison, Option 1 involves planning for the housing target plus a modest 15 home 'buffer', which is considered to be important, including on the basis that the delivery timetable for the Leisure Centre site - a constant under both of the alternatives (20 homes) - is uncertain. However, having said this, it is recognised that two of the sites that feature in Option 2, namely Sturgeon Farm and Walcot Road, could feasibly deliver more homes than are assumed here (100 and 75 respectively). A further consideration, in respect of meeting

housing needs, is the likelihood that a scheme of 10 homes at Sandstone Way would fail to deliver affordable housing.

6.22 A second consideration is the matter of supporting new and upgraded community infrastructure, or delivery of wider infrastructure to the benefit of the community. In this respect, a key point to note is that Option 1 would deliver new cemetery space, as well as a new link road (linking Shelfanger Road and Heywood Road). It is not clear that the other sites in question would deliver community benefits of note, and it is also important to note the proposal (under Option 1) is not only to leave Walcot Road undeveloped, but also to designate it as a Local Green Space.

6.23 In conclusion, both Options perform well, and significant positive effects are considered likely by way of meeting housing needs. However, Option 1 performs better; given that the scheme will address a known existing issue in respect of cemetery space.

Health and wellbeing

Land, soil and water resources	Option 1	Option 2
Rank and likely effects	2	1

6.24 Having already discussed a range of relevant matters above, the focus here is on ensuring good access to accessible open / green space and the open countryside. Taking sites in turn:

- North of the Cemetery (Option 1) – there would be impacts to the attractiveness of the bridleway that passes through the site, potentially discouraging access to the countryside.
- Sturgeon's Farm (Option 2) - is located adjacent to an allotment.
- Walcot Road (Option 2) – is the only one of the four sites in question without direct footpath access to the wider countryside; however, onsite constraints (in particular a mature oak tree and a large pond) might support delivery of high quality onsite green infrastructure. It is noted that the site is proposed for Local Green Space Designation; however, it is unclear whether there is or would be public access to the site, were it to be left undeveloped.
- Sandstone Way (Option 2) - benefits from excellent access to high quality green space, in the form of Roydon Fen; however, on the other hand, the site is adjacent to the A1066, which will likely mean a degree of noise and potentially air pollution.

6.25 In conclusion, it is fair to highlight Option 2 as preferable on balance, given the issue of the bridleway passing through North of the Cemetery at Option 1; however, this conclusion is fairly marginal, and the overall effects are uncertain in the absence of detailed mitigation. Minor positive effects are considered more likely at this stage under Option 2.

Transportation

Land, soil and water resources	Option 1	Option 2
Rank and likely effects	1	2

6.26 A range of transport-related matters have already been discussed above. A key benefit of Option 1 is delivery of the new link road, which presumably will serve to reduce pressure on the problematic B1077. A potential benefit of Option 2 is that growth would be somewhat more dispersed around the town; however, all three sites give rise to concerns:

- Sturgeon's Farm (Option 2) – would lead to increased traffic along Louie's Lane, which is narrow in parts, and already serves a large housing area.
- Walcot Road (Option 2) – Diss Town Council has raised significant objections as part of the current planning application for 90 homes, with concerns focused on Frenze Road / Frenze Hall Lane, which serves a large and recently expanded housing area.
- Sandstone Way (Option 2) – whilst only a small site, it would lead to increased traffic using the A1066 / Denmark Lane junction.

6.27 In conclusion, it fair to highlight a risk of significant negative effects under Option 2, noting the following statement within the GNLP (2021): *“There are particular vehicular pressures on the A1066 Victoria Road and B1077 Denmark Street as they pass through the town, with congestion considered a barrier to more significant growth.”*

Summary findings

SEA theme	Rank and likely effects	
	Option 1	Option 2
Biodiversity	=	=
Climate change	=	=
Landscape	1	2
Historic environment	1	2
Land, soil and water resources	=	=
Population and communities	1	2
Health and wellbeing	2	1
Transportation	1	2

- 6.28 Overall, the appraisal has served to highlight the potential for **significant negative effects** under Option 2 in relation to transportation. This reflects a piecemeal growth strategy, with no potential to support significant road infrastructure improvements (for which there is a significant requirement for in Diss).
- 6.29 **Minor negative effects** are considered likely under both Options in relation to biodiversity, climate change, landscape, and historic environment, as well as for transportation under Option 1. This largely reflects the constraints of the Plan area as a sensitive landscape setting and historic settlement.
- 6.30 **Significant positive effects** are anticipated in relation to population and communities; by way of meeting the strategic housing requirements. **Minor positive effects** are also considered under Option 2 in relation to health and wellbeing, whilst these effects are less certain under Option 1.
- 6.31 **Uncertainty** is noted in relation to the land, soil and water resources SEA theme, reflecting the need for more detailed land surveys to inform agricultural classification.
- 6.32 In **conclusion**, the assessment shows Option 1 to outperform Option 2 in respect of most objectives, although it does not automatically follow that Option 1 is 'best' or 'most sustainable' overall, as the objectives are not assigned any particular weight. It is for the Steering Group to weigh the pros and cons of the alternatives 'in the balance' and, in turn, reach an overall conclusion on the best performing scenario – see Chapter 7.

Assessment of reasonable alternatives for Roydon

The following options have been established for Roydon:

- **Option 1:** Site 7 (Land opposite the school off Old High Street) delivering 25 homes.
- **Option 2:** Site 6 (South of the A1066) delivering 24 homes.
- **Option 3:** SN0526REV (Land south of High Road) delivering 25 homes.

Biodiversity

Biodiversity	Option 1	Option 2	Option 3
Rank and likely effects	1	2	2

6.33 All options lie near to Roydon Fen Local Nature Reserve (LNR) with Option 1 performing marginally better in this respect by way of its location north of the A1066. Given that none of the sites immediately join the LNR, no significant effects are considered likely; however, measures should be taken to minimise the impacts of noise and light disturbance at Options 2 and 3.

6.34 All sites are greenfield, agricultural land within a National Habitat Network Enhancement Zone 2, where opportunities to support habitat creation and enhance ecological links and corridors should be explored. Hedgerows at site boundaries are likely to hold biodiversity values and should be retained where possible. Any hedgerow loss should be appropriately compensated.

6.35 Overall no significant deviation from the baseline is anticipated under any Option and broadly neutral effects are considered likely at this stage. Provisions for biodiversity net gain and enhanced ecological links with Roydon Fen LNR could support long-term minor positive effects. Options 2 and 3 are considered to perform broadly on par, whilst Option 1 could be marginally preferred by way of its location north of the A1066.

Climate change

Climate change	Option 1	Option 2	Option 3
Rank and likely effects	1	1	2

6.36 Both climate change mitigation and adaptation are relevant considerations. In respect of mitigation, a primary consideration is the need to minimise per capita emissions from transport by minimising the need to travel and supporting a modal shift away from car dependency, i.e. by supporting a shift to 'sustainable' modes of transport (walking, cycling, public transport, electric vehicles). In this respect, the first point to note is that all Options are a similar distance from the services and facilities available along the A1066 in Roydon and in Diss. The Options are also well served by existing bus stops along the A1066. However, Options 1 and 2 are both located with excellent access to Roydon Primary School and perform marginally better than Option 3 in this respect. At Option 3 it is not certain whether direct access to the A1066 from the eastern extent of the site can be achieved (without access via third party land), this could negatively impact in terms of promoting walking. N.B. see further discussion below, under 'Transport and movement'.

- 6.37 Another consideration is the need to support delivery of low carbon infrastructure (e.g. a ground source heat network; or solar PV with battery storage) and/or high standards of sustainable design and construction, such that the development can achieve net zero or, at least, CO₂ emissions standards that exceed the requirements of Building Regulations. None of the Options present significant opportunities in this respect (as small-scale sites), and broadly perform on par with no significant deviations from the baseline anticipated.
- 6.38 With regards to climate change adaptation a key consideration is surface water flood risk, noting that none of the sites in question are affected by onsite fluvial flood risk, and there is no potential to differentiate between the sites in respect of wider matters relating to climate change adaptation, e.g. the need to minimise overheating risk. Options 1 and 2 lie adjacent to areas of low surface water flood risk, which particularly affects the A1066 east of the existing settlement area. The risk is not considered likely to lead to significant effects; however, Options 1 and 2 both present opportunities to improve road infrastructure drainage, particularly at any future access points where the sites adjoin the A1066.
- 6.39 Overall, no significant effects are considered likely under any of the options, and with no significant deviations from the baseline anticipated, broadly neutral effects are considered likely. This includes the assumption that trends which favour the private vehicle will continue also, given the provisions of the immediate settlement area and limits to accessibility improvements in development at any of the Options. Despite this, Options 1 and 2 are considered to perform marginally better overall than Option 3, given the ease of access to Roydon Primary School at both options, as well as opportunities to deliver on-site drainage systems which support reducing surface water flood risk in the vicinity of the site.

Landscape

Landscape	Option 1	Option 2	Option 3
Rank and likely effects	1	3	2

- 6.40 Noting the ridge of raised land to the north of the Waveney Valley, all Options hold a prominent edge of settlement location with commanding countryside views. Development at Option 2 will notably disrupt current views to the countryside in the exit from Roydon and approach to Diss. Options 1 and 3 are notably more screened by existing vegetation and perform better than Option 2 in this respect.
- 6.41 Development at Option 1 has the potential to connect with existing development (Roydon Primary School) north of the site and strengthen boundary screening at the south and east of the site, to notably reduce visual impacts and the perceived erosion of the gap between Roydon and Diss.
- 6.42 Development at Option 3 would backfill housing along the A1066 and although it is likely that screening would avoid significant impacts, concerns are raised over the likely effects on the settlement pattern, and any precedent this could set for future growth south of the settlement or east of the site. This area is notably more sensitive in landscape terms with significant tree coverage.

6.43 Overall, Option 1 is judged to perform best overall, given the potential for effective screening and integration with development north of the site. Option 3 is judged to perform marginally better than Option 2 however concern is raised over the effects on settlement form. A greater potential for negative effects of significance are identified at Option 2 given its prominent location between Roydon and Diss and the likely impacts development at the site would have on visual amenity and far-reaching countryside views. Whilst significant effects are more likely to be avoided under Options 1 and 3, the loss of greenfield land at the settlement edge will ultimately lead to minor long-term negative effects.

Historic environment

Historic environment	Option 1	Option 2	Option 3
Rank and likely effects	=	=	=

6.44 None of the options are constrained by designated heritage assets. Roydon Primary School is recognised as a non-designated asset¹³ where development at Options 1 and 2 would need to give appropriate consideration to its setting and contributing features. However, no significant effects are considered likely.

6.45 Overall, with minimal constraints identified broadly neutral effects are considered likely under all Options. Whilst development at Options 1 and 2 would need to give consideration to the setting of non-designated assets, these are design considerations for the development management process and as such, the alternatives are judged to perform on par.

Land, soil and water resources

Land, soil and water resources	Option 1	Option 2	Option 3
Rank and likely effects	=	=	=

6.46 Provisional datasets (available nationally) indicate that the land north of the Waveney is 'grade 3' quality land. However, the dataset is very low resolution and does not differentiate between grade 3a (which is classed as best and most versatile) and grade 3b (which is not classed as best and most versatile). The only lower grade agricultural land is found to the south of the town, associated with the river valley. None of the agricultural land surrounding Roydon has been surveyed in detail.

6.47 A second consideration is the extent to which the sites in question are likely to support agricultural uses, and in this respect, the sites under Options 1 and 3 appear to be in current agricultural use, whilst this is less certain at Option 2.

6.48 In conclusion, whilst there is some reason to suggest that there could be marginally more loss of productive agricultural land under Options 1 and 3, any difference is very slim and uncertain, hence the alternatives are judged to perform on a par. It is appropriate to flag an uncertain risk of negative effects, given that the agricultural land in question has not been surveyed in detail; however, effects are not considered likely to be significant given the small-scale nature of the Options.

¹³ Norfolk Historic Environment Record [online] <http://www.heritage.norfolk.gov.uk/simple-search>

Population and communities

Population and communities	Option 1	Option 2	Option 3
Rank and likely effects	1	2	3

- 6.49 Options 1 and 3 are considered to perform marginally better than Option 2 in terms of providing for the housing requirement in full (25 homes). Despite this, the shortfall of one dwelling under Option 2 is unlikely to lead to significant effects and windfall development is likely to capture this outstanding need. All Options are edge of settlement locations, with Options 1 and 2 performing notably worse than Option 3, by way of their potential contribution to coalescence with Diss. However, none of the options are located within the proposed 'strategic open gap' between the two settlements, and thus separation will be maintained, and no significant effects are considered likely. Each site is also considered to perform on par in terms of their potential to deliver an element of affordable housing.
- 6.50 None of the Options are of a scale to support the delivery of new community infrastructure that could enhance provisions in the settlement. However, each Option is well located adjacent to the existing settlement area in the east and south, and notably Options 1 and 2 provide excellent access to Roydon Primary School to promote walkable journeys. With their direct connection to Tottington Lane, development at both Options 1 and 2 could also provide excellent access to Roydon Fen Local Nature Reserve (LNR). Development at Option 3 could also provide new residents with relatively good access to Roydon Playground and would provide residents with access to Roydon Fen LNR via the connecting Public Right of Way (PRoW).
- 6.51 In conclusion, all Options perform relatively well, and minor positive effects are considered likely. Options 1 and 2 are considered for their excellent access to education facilities and more direct access to natural recreational space, performing very slightly better than Option 3 in this respect. However, Option 1 is preferred to Option 2 overall, given its ability to meet housing needs in full.

Health and wellbeing

Health and wellbeing	Option 1	Option 2	Option 3
Rank and likely effects	2	2	1

- 6.52 Having already discussed a range of relevant matters above, the focus here is on ensuring good access to accessible open / green space and the open countryside. As noted previously, both Options 1 and 2 could provide excellent access to Roydon Fen Local Nature Reserve (LNR) with their direction connection to Tottington Lane. However, given their location adjacent to the A1066 the potential for noise and air pollution affecting residents is also recognised.
- 6.53 Option 3 could provide residents with relatively good access to Roydon Playground, as well as Roydon Fen LNR; which, whilst located a further distance away is accessible by the Public Right of Way (PRoW) adjoining the site in the west providing direct access to the LNR.

6.54 By way of its access to a wider range of recreational space, and its location set back from the A1066 (thus avoiding noise and air quality impacts), Option 3 is considered to perform marginally better than Options 1 and 2 overall. Despite this, minor long-term positive effects are considered likely under all Options.

Transportation

Transportation	Option 1	Option 2	Option 3
Rank and likely effects	1	1	2

6.55 A range of transport-related matters have already been discussed above, however, a key consideration relates to the effects of development on the A1066, particularly that which adds to congestion in Diss, given the statement within the GNLP (2021) which identifies: *“There are particular vehicular pressures on the A1066 Victoria Road and B1077 Denmark Street as they pass through the town, with congestion considered a barrier to more significant growth”* and the evidence presented within the Diss Network Improvement Strategy (2020).

6.56 In this respect all Options are considered for their potential to add congestion to the A1066, particularly within Diss as residents will continue to travel here to access a wider range of goods and services. In line with the evidence underpinning the likely impacts of growth in and around Diss, even with mitigation, residual minor negative effects are considered likely.

6.57 These effects are largely considered unavoidable, particularly when considering the ability for development to address known issues at the scale which is being proposed. All Options are reasonably located to provide good access to bus stops along the A1066 and promote more walkable journeys more locally e.g. the school run. Options 1 and 2 perform notably well in this respect, given their ease of access to Roydon Primary School.

Summary findings

SEA theme	Rank and likely effects		
	Option 1	Option 2	Option 3
Biodiversity	1	2	2
Climate change	1	1	2
Landscape	1	3	2
Historic environment	=	=	=
Land, soil and water resources	=	=	=
Population and communities	1	2	3
Health and wellbeing	2	2	1
Transportation	1	1	2

- 6.58 Overall, the assessment has served to highlight the potential for **significant negative effects** under Option 2 in relation to landscape. This is given its prominent position in relation to the settlement character, its relationship with the surrounding countryside and potential impacts on long-distance views.
- 6.59 **Minor negative effects** in relation to landscape are also anticipated under Options 1 and 3, but the potential for tree screening to support better integration and reduce landscape impacts under these Options is considered.
- 6.60 **Minor long-term negative effects** are also anticipated under all Options in relation to transportation given the likely impacts of added congestion on the A1066.
- 6.61 **Minor positive effects** are concluded as likely in relation to population and communities and health and wellbeing, reflecting the potential for each option to deliver against housing needs and provide good access to educational facilities and recreational space.
- 6.62 **Uncertainty** is noted in relation to soil resources, noting the potential for ‘best and most versatile’ agricultural land that would need to be established for further survey work. Broadly **neutral effects** (no significant deviation from the baseline) is anticipated in relation to biodiversity, climate change and the historic environment.
- 6.63 In **conclusion**, the assessment shows Option 1 to outperform Options 2 and 3 in respect of most objectives, although it does not automatically follow that Option 1 is ‘best’ or ‘most sustainable’ overall, as the objectives are not assigned any particular weight. It is for the Steering Group to weigh the pros and cons of the alternatives ‘in the balance’ and, in turn, reach an overall conclusion on the best performing scenario – see Chapter 7.

Assessment of reasonable alternatives for Burston

The following options have been established for Burston:

- **Option 1:** GNLP0349 (Land west of Gissing Road) and GNLP1028 (Land east of Mill Road, Crown Farm Barn) delivering a total of 25 homes.
- **Option 2:** GNLP0386 (Land at Rectory Road) and GNLP1028 (Land east of Mill Road, Crown Farm Barn) delivering a total of 28 homes.

Biodiversity

Biodiversity	Option 1	Option 2
Rank and likely effect	=	=

6.64 Neither Option is constrained significantly in terms of biodiversity, with no near designated biodiversity sites or identified Priority Habitat within or adjacent to the sites. The 'Land at Rectory Road' under Option 2 is identified 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 east of the settlement and largely beyond the railway line. With the site lying at the fringes of this zone, no significant improvements to ecological linkages or Priority Habitat are anticipated in development.

6.65 Overall, development under either Option is not likely to lead to any significant deviation from the baseline, and broadly neutral effects are anticipated with both Options judged to perform broadly on par.

Climate change

Climate change	Option 1	Option 2
Rank and likely effect	1	2

6.66 Both climate change mitigation and adaptation are relevant considerations. In respect of mitigation, a primary consideration is the need to minimise per capita emissions from transport by minimising the need to travel and supporting a modal shift away from car dependency, i.e. by supporting a shift to 'sustainable' modes of transport (walking, cycling, public transport, electric vehicles). In this respect, Option 1 is judged to perform marginally better by way of its location closer to the key provisions on offer in the settlement, including; Burston Park, The Burston Crown, Espresso Vita and the garden centre. This provides support for local walkable journeys. However, limited existing footpath provisions along the roads surrounding all sites (under both Options) are considered a notable constraint to promoting safe walking routes. In this respect there is much reliance on the informal Public Rights of Way creating connections between Gissing Road and Mill Road, and between Crown Green and Audley End; to provide safe pedestrian links. Notably though, Option 1 would also provide residents with excellent access to bus stops situated on Gissing Road. N.B. see further discussion below, under 'Transport and movement'.

- 6.67 Another consideration is the need to support delivery of low carbon infrastructure (e.g. a ground source heat network; or solar PV with battery storage) and/or high standards of sustainable design and construction, such that the development can achieve net zero or, at least, CO₂ emissions standards that exceed the requirements of Building Regulations. Neither Option presents significant opportunities in this respect (as small-scale sites), and broadly perform on par with no significant deviations from the baseline anticipated.
- 6.68 With regards to climate change adaptation a key consideration is surface water flood risk, noting that none of the sites in question are affected by onsite fluvial flood risk, and there is no potential to differentiate between the sites in respect of wider matters relating to climate change adaptation, e.g. the need to minimise overheating risk. The sites under both Options are all bordered by areas of low, medium and high surface water flood risk, and both larger sites under each Option (GNLP0349 and GNLP0386) are intersected by areas of low risk. Surface water flood risk significantly affects areas of Mill Road, Crown Road and Rectory Road as well as the Public Right of Way which connects Crown Green with Audley End (adjoining GNLP0386 under Option 2 along the eastern border of the site). Any opportunities to improve road infrastructure and footpath drainage in development should be encouraged. It is likely that mitigation in the form of sustainable drainage systems on-site will significantly reduce the potential for negative effects.
- 6.69 Overall, no significant effects are considered likely under any of the options, and with no significant deviations from the baseline anticipated, broadly neutral effects are considered likely. This includes the assumption that trends which favour the private vehicle will continue also, given the provisions of the immediate settlement area and limits to accessibility improvements in development at any of the Options. Despite this, Option 1 is considered to perform marginally better when compared to Option 2 given the location of development with relatively better access to the few services available in the settlement.

Landscape

Landscape	Option 1	Option 2
Rank and likely effect	1	2

- 6.70 Option 1 would locate development on the higher ground within Burston, as opposed to Option 2 which locates most development on lower ground south of the settlement area. Most notably, Option 2 would develop the land between the existing settlement area at Burston and the hamlet of Audley End, leading to direct coalescence and eroding the distinct separation between these areas. It is considered appropriate in this respect to flag the potential for negative effects of significance under Option 2 at this stage.
- 6.71 Alternatively, development at Option 1 is judged to have better potential to integrate with the existing settlement area, and be supported by appropriate screening and boundary treatment, therefore reducing the landscape impacts of development. However, given the context of greenfield land at the settlement edge, residual minor long-term negative effects are still considered likely.

Historic environment

Historic environment	Option 1	Option 2
Rank and likely effect	2	1

6.72 The 'Land east of Mill Road' site, which features under both options, is located adjacent to a non-designated monument (a Medieval moat) and close to the Grade II listed Crown Farmhouse, the Grade II listed Red House and the Grade II listed Burston Crown pub. The site is also located within the proposed extension to Burston Conservation Area to include the rest of the orchard and adjacent tree coverage, and the pond further north of the site. The site is recognised in its current form for its significant contribution to the heritage setting of the village, and it is considered appropriate to flag the potential for significant negative effects under both Options through the development of housing in this area. As a small contributing site (delivering a total of 5 homes), it is recommended that further options to intensify development at alternatives sites are considered (with the larger site options under consideration being located further away from the designated conservation area, albeit likely to affect road congestion within the conservation area).

6.73 With regards to the variable sites under the Options:

- 'The Land west of Gissing Road' under Option 1, development would also need to consider the setting of the Grade II listed Manor House Farmhouse nearby.
- The 'Land at Rectory Road' under Option 2 is less constrained by designated and non-designated assets.

6.74 Overall, whilst the potential for significant negative effects is flagged under both Options, Option 2 is considered to perform slightly better than Option 1 given the lack of historic environment constraints associated with the larger development site under this Option.

Land, soil and water resources

Land, soil and water resources	Option 1	Option 2
Rank and likely effect	=	=

6.75 Provisional datasets (available nationally) indicate that the land surrounding the settlement is 'grade 3' quality land. However, the dataset is very low resolution and does not differentiate between grade 3a (which is classed as best and most versatile) and grade 3b (which is not classed as best and most versatile). None of the agricultural land surrounding Burston has been surveyed in detail.

6.76 A second consideration is the extent to which the sites in question are likely to support agricultural uses, and in this respect, the larger sites under both Options could support agricultural activities.

6.77 Overall, whilst the Options are judged to perform on par, it is considered appropriate to flag an uncertain risk of negative effects, given that the agricultural land in question has not been surveyed in detail. However, effects are not considered likely to be significant given the small-scale nature of the Options.

Population and communities

Population and communities	Option 1	Option 2
Rank and likely effect	1	2

- 6.78 Option 2 is considered to perform marginally better than Option 1 by slightly exceeding the required housing figure for 25 homes in Burston. Despite this, positive effects are anticipated under both Options, as both meet the required level of housing development. Both Options are edge of settlement locations, but notably, development under Option 2 could lead to direct coalescence with Audley End, and negative impacts for community identity and social integration in this respect.
- 6.79 Each Option is considered to perform on par in terms of their potential to deliver an element of affordable housing. Furthermore, neither Option is of a scale to support the delivery of new community infrastructure that could enhance provisions in the settlement. Option 1 is judged to perform marginally better by way of its location closer to the key provisions on offer in the settlement, including; Burston Park, The Burston Crown, Espresso Vita and the garden centre. Though the sites under both Options connect well with existing Public Rights of Way creating connections between Gissing Road and Mill Road, and between Crown Green and Audley End. Notably though, Option 1 would also provide residents with excellent access to bus stops situated on Gissing Road.
- 6.80 In conclusion, Option 1 is preferred overall given the potential impacts of coalescence in development under Option 2. Overall minor long-term positive effects are considered likely under Option 1, whereas overall uncertain effects are noted for Option 2, given the potential impacts of coalescence on community identity and the social integration of future residents at the 'Rectory Road' site.

Health and wellbeing

Health and wellbeing	Option 1	Option 2
Rank and likely effect	=	=

- 6.81 Having already discussed a range of relevant matters above, the focus here is on ensuring good access to accessible open / green space and the open countryside. In this respect, development under either Option would provide residents with good access to Burston Park and the existing Public Rights of Way connections within the settlement. Minor long-term positive effects are anticipated under both Options, which are judged to perform broadly on par.

Transportation

Transportation	Option 1	Option 2
Rank and likely effect	1	2

- 6.82 A range of transport-related matters have already been discussed above, however, a key consideration relates to the effects of development on the A1066, particularly that which adds to congestion in Diss, given the statement within the GNLP (2021) which identifies: *“There are particular vehicular*

pressures on the A1066 Victoria Road and B1077 Denmark Street as they pass through the town” and the evidence presented within the Diss Network Improvement Strategy (2020).

- 6.83 In this respect both Options are considered for their potential to add congestion to the A1066 within Diss as residents will continue to travel here to access a wider range of goods and services. In line with the evidence underpinning the likely impacts of growth in and around Diss, even with mitigation, residual minor negative effects are considered likely. These effects are largely considered unavoidable, particularly when considering the ability for development to address known issues at the scale which is being proposed.
- 6.84 Development under Option 1 would provide residents with better access to bus stops (situated on Gissing Road), and furthermore the site is well connected to the existing provisions in the settlement to promote more walkable local journeys. However, both Options connect well with existing Public Rights of Way.
- 6.85 Overall, minor negative effects are considered an inevitable consequence of growth in this area and concluded for both Options in this respect. Despite this, Option 1 is judged to perform better than Option 2 by way of the location of growth with better access to existing bus stops and the services and facilities available within the settlement.

Summary findings

SEA theme	Rank and likely effects	
	Option 1	Option 2
Biodiversity	=	=
Climate change	1	2
Landscape	1	2
Historic environment	2	1
Land, soil and water resources	=	=
Population and communities	1	2
Health and wellbeing	=	=
Transportation	1	2

- 6.86 Overall, the appraisal has served to highlight a potential for **significant negative effects**. The potential effects of coalescence under Option 2 is highlighted for negative effects of significance in relation to landscape and uncertain effects for communities and future residents. Most notably though, both Options include the 'Land east of Mill Road' site; a sensitive heritage site. The 'Land east of Mill Road' in its current form (as an orchard) is a proposed extension to the Burston Conservation Area, and a change of use to residential at this site could impact upon these proposals and lead to negative effects of significance.
- 6.87 **Minor negative effects** are also anticipated in relation to the effects of growth on the road transport network within and surrounding Burston, as well as resulting from a loss of greenfield land at the settlement edge.
- 6.88 **Minor positive effects** are concluded in relation to population and communities under Option 1, and for health and wellbeing under both Options. This relates to the delivery of housing to meet local needs, and the location of development with relatively good access to open space and the surrounding countryside via Public Rights of Way.
- 6.89 **Uncertainty** is noted in relation to the land, soil and water resources SEA theme, reflecting the need for more detailed land surveys to inform agricultural classification.
- 6.90 With no significant deviations from the baseline anticipated in relation to biodiversity and climate change, broadly **neutral effects** are concluded.
- 6.91 In **conclusion**, the assessment shows Option 1 to outperform Option 2 in respect of most objectives, although it does not automatically follow that Option 1 is 'best' or 'most sustainable' overall, as the objectives are not assigned any particular weight. It is for the Steering Group to weigh the pros and cons of the alternatives 'in the balance' and, in turn, reach an overall conclusion on the best performing scenario – see Chapter 7.

Assessment of reasonable alternatives for Scole

The following options have been established for Scole:

- **Option 1:** GNLP0338R (Land at Rose Farm off Bungay Road) and 'The Former Scole Engineering Site' delivering a total of 26 homes.
- **Option 2:** GNLP0527 (Land south of Bungay Road) and 'The Former Scole Engineering Site' delivering a total of 32 homes.
- **Option 3:** GNLP0339 (Land at Street Farm, west of Low Road), GNLP2066 (1 Bridge Road) and 'The Former Scole Engineering Site' delivering a total of 32 homes.
- **Option 4:** SN4022 (East of Norwich Road) and 'The Former Scole Engineering Site' delivering a total of 65 homes.

Biodiversity

Biodiversity	Option 1	Option 2	Option 3	Option 4
Rank and likely effect	=	=	=	=

6.92 None of the options are significantly constrained in relation to designated biodiversity sites or Priority Habitat. The land north of the settlement area is largely identified as part of a National Habitat Network Expansion Zone, and the land 'East of Norwich Road' (SN4022) lies within the identified 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. With the site lying at the fringes of this zone, no significant improvements to ecological linkages or Priority Habitat are anticipated in development.

6.93 Overall, the options are considered to perform broadly on par and with no significant deviations from the baseline anticipated, residual neutral effects are considered likely.

Climate change

Climate change	Option 1	Option 2	Option 3	Option 4
Rank and likely effect	2	3	3	1

6.94 Both climate change mitigation and adaptation are relevant considerations. In respect of mitigation, a primary consideration is the need to minimise per capita emissions from transport by minimising the need to travel and supporting a modal shift away from car dependency, i.e. by supporting a shift to 'sustainable' modes of transport (walking, cycling, public transport, electric vehicles). In this respect, Options 2, 3 and 4 are judged to perform marginally better than Option 1, by way of their location closer to the available services and facilities in the settlement. Notably, Option 4 would provide excellent access to Scole Primary School to support walkable daily journeys (i.e. the school run). All options adjoin existing Public Rights of Way and are located with good access to existing bus stops.

- 6.95 Another consideration is the need to support delivery of low carbon infrastructure (e.g. a ground source heat network; or solar PV with battery storage) and/or high standards of sustainable design and construction, such that the development can achieve net zero or, at least, CO₂ emissions standards that exceed the requirements of Building Regulations. None of the Options presents significant opportunities in this respect (as relatively small-scale sites), whilst Option 4 may present greater opportunities when compared to the remaining Options (by way of a larger scheme proposal) it is uncertain whether this level of growth would achieve significant sustainability improvements over and above the other sites in contention. The Options are therefore judged to broadly perform on par with no significant deviations from the baseline anticipated.
- 6.96 With regards to climate change adaptation a key consideration is surface water flood risk, noting that none of the sites in question are affected by onsite fluvial flood risk, and there is no potential to differentiate between the sites in respect of wider matters relating to climate change adaptation, e.g. the need to minimise overheating risk. The sites under all Options are constrained by surface water flood risk affecting road infrastructure in the settlement; however, Options 2 and 3 are notably constrained by areas of low, medium and to a lesser extent high surface water flood risk. Any opportunities to improve road infrastructure and footpath drainage in development should be encouraged. It is likely that mitigation in the form of sustainable drainage systems on-site will significantly reduce the potential for negative effects.
- 6.97 Overall, no significant effects are considered likely under any of the options, and with no significant deviations from the baseline anticipated, broadly neutral effects are considered likely. This includes the assumption that trends which favour the private vehicle will continue also, given the provisions of the immediate settlement area and limits to accessibility improvements in development at any of the Options. Despite this, Options 1 and 4 are considered to perform marginally better when compared to Options 2 and 3 given less constraints in relation to surface water flood risk on-site. Option 4 is also considered to perform best overall given the accessibility of development in this location and key connection with Scole Primary School.

Landscape

Landscape	Option 1	Option 2	Option 3	Option 4
Rank and likely effect	1	1	1	2

- 6.98 The landscape of Scole has a rising topography from the lower grounds of the River Waveney in the south to a higher ridge north of the settlement. Notably, Option 4 would see development on the higher ground in the settlement, ultimately increasing the potential for impacts on long-distance views and visual amenity. Options 1, 2 and 3 are therefore marginally preferred by containing development in the river valley. All options would see the development of greenfield land within or adjacent to the settlement, and most notably Option 4 would encroach upon open countryside. Development at Options 1, 2 and 3 are better contained within the settlement, infilling the land between the existing settlement area and significant road infrastructure (the A140 and the A143). Trees and hedgerows within and adjacent to the sites

(under all Options) are recognised landscape features which should be retained and protected in development.

- 6.99 Overall, whilst significant landscape impacts are likely to be avoidable under all Options, the loss of greenfield land either within the settlement confines or at the settlement edge is likely to lead to minor long-term negative effects for the landscape. By way of its location on higher ground leading into open countryside, Option 4 is not considered to rank as highly as the other Options.

Historic environment

Historic environment	Option 1	Option 2	Option 3	Option 4
Rank and likely effect	1	2	3	2

- 6.100 Option 1 is notably less constrained by designated and non-designated heritage assets than Options 2, 3 and 4, and as such, the Option is considered to perform better overall.
- 6.101 All Options are constrained by inclusion of the ‘Former Scole Engineering Works’ site which lies within Scole Conservation Area. However, given current uses on site, it is recognised that housing development has the potential to improve the townscape setting to some degree.
- 6.102 Option 3 is notably constrained by locating all growth within the designated Scole Conservation Area in close proximity to the Listed Buildings along The Street and Diss Road. The option is considered for the cumulative pressures this will place on the character and form of the settlement; particularly via the loss of (informal) greenspace within the designated area. In this respect, it is considered appropriate to flag the potential for cumulative negative effects of significance. The site at ‘1 Bridge Road’ (GNLP2066) is also identified as an ‘Archaeology Area’ within the Norfolk Historic Environment Record (HER).¹⁴
- 6.103 Option 2 lies near to Scole Conservation Area, with access to the site falling within the designated area. Development of appropriate access is likely to lead to minor negative effects in relation to the townscape setting in this area at the edge of the Conservation Area. Similarly, Option 4 lies near the designated conservation area, where appropriate consideration will need to be given to heritage settings. The variable sites under Options 2 and 4 also lie adjacent to ‘Archaeology Areas’ and the potential for additional finds is highlighted (thus highlighting the need for appropriate archaeological investigation prior to development).
- 6.104 Option 1 is judged to perform best overall by avoiding areas of heritage constraint. This option is considered likely to lead to neutral effects. By way of their sensitive locations, development under Options 2, 3 and 4 are highlighted for a greater potential for minor long-term negative effects. Furthermore, the cumulative effects of growth on Scole Conservation Area under Option 3 is considered for negative effects of greater significance. For this reason, the Option is judged to rank least favourably.

¹⁴ Norfolk Historic Environment Record [online] <http://www.heritage.norfolk.gov.uk/simple-search>

Land, soil and water resources

Land, soil and water resources	Option 1	Option 2	Option 3	Option 4
Rank and likely effect	1	1	1	2

- 6.105 Provisional datasets (available nationally) indicate that the land surrounding the settlement is 'grade 3' quality land. However, the dataset is very low resolution and does not differentiate between grade 3a (which is classed as best and most versatile) and grade 3b (which is not classed as best and most versatile). None of the agricultural land surrounding Scole has been surveyed in detail.
- 6.106 A second consideration is the extent to which the sites in question are likely to support agricultural uses, and in this respect, the larger site under Option 4 could support agricultural activities; presenting the argument for this Option ranking less favourably.
- 6.107 Overall, it is considered appropriate to flag an uncertain risk of negative effects, given that the agricultural land in question has not been surveyed in detail. However, effects are not considered likely to be significant given the small-scale nature of the Options. Options 1, 2 and 3 are judged to perform marginally better than Option 4, as the sites under these Options do not appear to be in current agricultural use.

Population and communities

Population and communities	Option 1	Option 2	Option 3	Option 4
Rank and likely effect	3	2	2	1

- 6.108 Option 4 is considered to perform marginally better than the other Options by exceeding the required housing figure for 25 homes in Scole and delivering a wider offer and potential range of homes. Despite this, positive effects are anticipated under all Options, as all will meet the required level of housing development. Option 4 is also noted for a greater potential to deliver more affordable housing and tenure types/ size mix.
- 6.109 Options 2, 3 and 4 are judged to perform marginally better than Option 1, by way of their location closer to the available services and facilities in the settlement. Notably, Option 4 would provide excellent access to Scole Primary School to support walkable daily journeys. All options adjoin existing Public Rights of Way and are located with good access to existing bus stops.
- 6.110 None of the Options would deliver development of a scale to support the delivery of new community infrastructure that could enhance provisions in the settlement.
- 6.111 In conclusion, minor long-term positive effects are anticipated under all Options. Option 4 is preferred overall for its potential to deliver more homes, more affordable homes, and a greater mix of tenures and sizes. Development under Option 4 is also well located in relation to the provisions of the settlement, including excellent school access. Option 1 is located further from existing provisions, and whilst this is not of a distance to give cause for concern, it is reflected in the ranking of the options.

Health and wellbeing

Health and wellbeing	Option 1	Option 2	Option 3	Option 4
Rank and likely effect	1	2	3	1

- 6.112 Having already discussed a range of relevant matters above, the focus here is on ensuring good access to accessible open / green space and the open countryside.
- 6.113 Options 1 and 4 are located with better access to Scole Playing Fields than Options 2 and 3, with more direct access to Public Rights of Way (PRoW) and the open countryside beyond the settlement. Options 1 and 4 are thus judged to perform marginally better in terms of supporting health and wellbeing and access to recreational space than Option 2 and 3.
- 6.114 Furthermore, the 'Land south of Bungay Road' under Option 3 adjoins a sewage works site where potential impacts for resident health require due consideration prior to development.
- 6.115 Overall, assuming suitable mitigation could be provided to avoid negative effects arising for resident health as a result of the nearby sewage works under Option 3, the provisions of the settlement and countryside setting are considered likely to support minor long-term positive effects for residents under all of the Options. Despite this, the identified constraints under Option 3 and subsequent need for mitigation is reflected in the ranking of the Options (with Option 3 ranking least favourably in this respect). Options 1 and 4 are judged to perform better than the other Options, given better access to recreational space and PRoW.

Transportation

Transportation	Option 1	Option 2	Option 3	Option 4
Rank and likely effect	2	1	1	3

- 6.116 A range of transport-related matters have already been discussed above, however, a key consideration relates to the effects of development on the A1066, particularly that which adds to congestion in Diss, given the statement within the GNLP (2021) which identifies: *“There are particular vehicular pressures on the A1066 Victoria Road and B1077 Denmark Street as they pass through the town”* and the evidence presented within the Diss Network Improvement Strategy (2020).
- 6.117 In this respect all Options are considered for their potential to add congestion to the A1066 within Diss as residents will continue to travel here to access a wider range of goods and services. In line with the evidence underpinning the likely impacts of growth in and around Diss, even with mitigation, residual minor negative effects are considered likely. These effects are largely considered unavoidable, particularly when considering the ability for development to address known issues at the scale which is being proposed. Notably, these effects are likely to be exacerbated under the higher growth scenario proposed under Option 4.

- 6.118 Options 2, 3 and 4 are judged to perform marginally better than Option 1, by way of their location closer to the available services and facilities in the settlement (reducing the need to travel). Notably, Option 4 would provide excellent access to Scole Primary School to support walkable daily journeys. All options adjoin existing Public Rights of Way and are located with good access to existing bus stops.
- 6.119 Overall, minor negative effects are considered an inevitable consequence of growth in this area and concluded for all Options in this respect. These effects are likely to be exacerbated under Option 4 (as a higher growth scenario) and this is reflecting in the ranking of Options; with Option 4 ranking least favourably (despite relatively good local accessibility). Options 2 and 3 are considered to perform marginally better than Option 1, by providing slightly more support in reducing the need to travel.

Summary findings

SEA theme	Rank and likely effects			
	Option 1	Option 2	Option 3	Option 4
Biodiversity	=	=	=	=
Climate change	2	3	3	1
Landscape	1	1	1	2
Historic environment	1	2	3	2
Land, soil and water resources	1	1	1	2
Population and communities	3	2	2	1
Health and wellbeing	1	2	3	1
Transportation	2	1	1	3

- 6.120 Overall, the appraisal has served to highlight the potential for **significant negative effects** under Option 3 in relation to the historic environment. This relates to the cumulative pressures this Option would place on Scole Conservation Area, with all proposed growth located within it.
- 6.121 **Minor negative effects** are concluded likely for all options in relation to transportation and landscape. This relates to the pressures of additional growth on the road network, the loss of greenfield land within and/ or surrounding the settlement. The potential for minor negative effects on heritage is also identified under Options 2 and 4.
- 6.122 **Minor positive effects** are concluded in relation to population and communities and health and wellbeing for all Options, reflecting the delivery of housing to support residents in locations with good access to recreational space and the surrounding countryside.
- 6.123 **Uncertainty** is noted in relation to the land, soil and water resources SEA theme, reflecting the need for more detailed land surveys to inform agricultural classification.
- 6.124 With no significant deviations from the baseline anticipated in relation to biodiversity and climate change, broadly **neutral effects** are concluded for all Options.
- 6.125 In **conclusion**, the assessment shows Option 1 to outperform the other Options in respect of most objectives, although it does not automatically follow that Option 1 is 'best' or 'most sustainable' overall, as the objectives are not assigned any particular weight. It is for the Steering Group to weigh the pros and cons of the alternatives 'in the balance' and, in turn, reach an overall conclusion on the best performing scenario – see Chapter 7.

7. Developing the preferred approach

7.1 The DDNP Steering Group have provided the following reasons for developing the preferred approach in light of the alternatives assessment:

“Diss

- *Option 1 continues to be the preferred option as it has shown to out-perform Option 2.*
- *The potential for significant negative effects in relation to transport is a concern for Option 2, especially the likelihood of increased traffic along Louis’s Lane and Frenze Hall Lane, and the inadequacy of highway infrastructure to deal with that.*
- *There is concern about Option 2 extending the built-up area into the countryside and further eroding the gap between Diss and Roydon.*
- *Option 1 will enable delivery of a new link road to alleviate pressure on the town centre, and also an extension to the Cemetery which is important community infrastructure.*
- *As a mitigating measure we will add a requirement into the allocation policy for the land north of the cemetery to ensure that the Public Footpath which runs along the north edge of the site and the Restricted Byway that bisects the site north-south are preserved. Internal layout will be expected to connect with the two public rights of way and for improvements to be made to the surface and opportunities taken to improve wildlife habitat adjacent to them.*

Roydon

- *Option 1 is the preferred option.*
- *There is significant concern that Options 2&3 which are south of the A1066 will adversely impact on the setting of the Waveney Valley.*
- *They may also impact on the local nature reserve, Roydon Fen which is located just to the south of Options 2 & 3.*
- *Option 1 has shown to be more sustainable a location, adjacent the primary school. This also provides opportunity to improve journeys to school, in relation to drop offs.*
- *As a mitigating measure in relation to transport, we will request consideration of an extension to the 30mph limit between Diss and Roydon and will add this to the supporting text of the NP.*

Burston

- *The SEA has highlighted the potential for significant negative impacts on heritage from the land east of Mill Road site, so it is proposed that option 1 is taken forward, but without this site and instead a slight extension to the Land west of Gissing Road.*
- *Option 2 is rejected on the basis of the landscape impacts it would have, most notably it would develop the land between the existing settlement at*

Burston and the hamlet of Audley End, leading to increased coalescence and eroding the distinction between the two.

Scale

- *Option 1 is preferred but with slight extension to the site boundary for Land at Rose Farm off Bungay Road to ensure safe highway access. This particular site (Land at Rose Farm) is no longer a working farm, with former farm buildings current vacant and unused, therefore this option also provides an opportunity to regenerate a redundant site.*
- *Option 2 is considered a fair alternative to Option 1 and would deliver housing growth in one central location within close proximity to services. However, it was not best supported by the community during recent consultations and doesn't have the advantage of regenerating a redundant farm site.*
- *There is concern that Option 3 would affect the setting of the Conservation Area and potentially impact upon a number of nearby listed buildings.*
- *There is concern that Option 4 would extend the settlement into the open countryside."*

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

8. Introduction (to Part 2)

8.1 The aim of this section is to present findings and recommendations in relation to the current Regulation 14 consultation draft of the DDNP. This section of the report presents:

- An appraisal of the current version of the DDNP under the eight SEA theme headings establishing through scoping (see **Chapter 3**);
- An overview of the likely cumulative effects; and
- The overall conclusions at this current stage and recommendations for the next stage of plan-making.

Methodology

8.2 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**).

8.3 For each theme 'significant effects' of the current version of 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.

8.4 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.

DDNP policies

8.5 To supplement the implementation of the vision for the DDNP (discussed in **Chapter 2**), the current version of the Plan put forward 32 policies to guide future development in the Plan area (19 of which are site allocation policies). The policies, which were developed following extensive community consultation and evidence gathering, are set out in **Table 8.1**.

Table 8.1: DDNP policies

Policy reference	Policy name
Site allocation policies:	
Diss	
DDNP01	Land north of the Cemetery, west of Heywood Road and east of Shelfanger Road, Dissn
DDNP02	Site of derelict Victorian Infant School, the Causeway, Diss
DDNP03	Site of the Diss Leisure Centre
DDNP04	Land west of Nelson Road and east of Station Road, Diss
DDNP05	Land north of Nelson Road, Diss
DIS1	Land north of Vince's Road, Diss
DIS2	Land off Park Road, Diss
DIS3	Land off Denmark Lane, Diss (including part of Roydon parish)
DIS6	Land behind Thatchers Needle, Diss
DIS 7	Feather Mills Site, Park Road, Diss
DIS 9	Land at Sandy Lane (north of Diss Business Park)
Roydon	
DDNP06	Site south of Roydon Primary School, Roydon
Burston	
DDNP07	Land west of Gissing Road, Burston
Scole	
DDNP08	Land east of Norwich Road, Scole
DDNP09	Land at Rose Farm off Bungay Road, Scole
DDNP10	Former Scole Engineering Site, Diss Road, Scole
Brome and Oakley	
DDNP11	Land north east of Ivy House, Brome
DDNP12	Land north of the B1118, Lower Oakley
DDNP13	Land south of the B1118, Lower Oakley
	Eye Airfield, Brome
Development management policies:	
Policy 2	Housing mix
Policy 3	Affordable housing
Policy 4	Design
Policy 5	Green Corridors
Policy 6	Road traffic improvements
Policy 7	Walking and cycling network
Policy 8	Diss Leisure Centre
Policy 9	Broadband

Policy reference	Policy name
Policy 10	Funding and delivery of infrastructure
Policy 11	Strategic gap between Diss and Roydon
Policy 12	Local Green Space
Policy 13	Protection of important views
Policy 14	Designated and non-designated heritage assets

9. Appraisal of the DDNP

Biodiversity

- 9.1 In relation to internationally designated biodiversity sites outside of the Plan area, the Habitats Regulations Assessment (HRA) produced for the DDNP identifies impact pathways in relation to Breckland Special Protection Area (SPA), Waveney & Little Ouse Valley Fens Special Area of Conservation (SAC), and Redgrave and South Lopham Fens Ramsar site. However, the HRA concludes that the DDNP provides a sufficient policy framework to ensure no adverse effects on the integrity of international designated sites will occur in isolation or in combination with other projects and plans.
- 9.2 The main biodiversity constraints in the Plan area relate to the designated Roydon Fen Local Nature Reserve (LNR) and areas of Priority Habitat. In terms of the new allocation sites at Diss, DDNP01 (Land north of the Cemetery) lies adjacent to the cemetery which is designated as a County Wildlife Site (CWS). The proposals for DDNP01 seek a cemetery extension north of the existing cemetery space, providing a significant buffer between development and the designated area, and providing the opportunity for habitat enhancement in this area. The site is expected to act as informal recreation land until the extension is required. The western extent of the site is also recognised as a 'Habitat Network Expansion Zone'. The zone surrounds areas of Priority Habitat; both 'traditional orchards' and 'deciduous woodland' and the land within this zone is deemed suitable for habitat re-creation and identifying opportunities to connect or link-up networks across the landscape. This context is reflected in proposed Policy DDNP01, which requires that development delivers "*biodiversity net gain which includes habitat enhancement or creation, to link with the nearby green corridors*". Green corridors are identified in proposed Policy 5 (Green Corridors), highlighting the opportunity for development to support enhancement of and access to Green Corridor '13' traversing the site in the north-south direction to encompass the Cemetery, the Parish Fields and The Mere.
- 9.3 As brownfield sites, DDN02 (Site of derelict Victorian Infant School, the Causeway, Diss), DDNP03 (Diss Leisure Centre) and DDNP04 (Land west of Nelson Rd and east of Station Rd) provide opportunities for biodiversity net gain and habitat enhancement. This is particularly relevant to DDNP02 given its location between areas of dense tree coverage and The Mere. This could be better reflected through the site-specific policy; to identify the potential habitat connections surrounding the site, and capitalising on opportunities to connect with the identified green corridors. However, it is recognised that Policy 5 (Green Corridors) requires that all "*new development proposals must recognise the identified green corridors*", and that proposals within or adjacent to a green corridor "*will be resisted unless they are able to demonstrate how they deliver appropriate net gains in biodiversity or qualitative improvement to the corridor.*"
- 9.4 The permitted development and rolled over allocations sites from the adopted Local Plan (DDNP05 Land north of Nelson Rd, DIS1 Land north of Vince's Rd, DIS2 Land off Park Rd, DIS3 Land off Denmark Lane, DIS6 Land behind Thatchers Needle, DIS7 Feather Mills Site and DIS9 Land at Sandy Lane) have

- all been found sound in principal as development sites, and no significant effects are considered likely on this premise. It is recognised that the allocation site DIS9 (Land at Sandy Lane) lies adjacent to a County Wildlife Site, and DDNP Policy DIS9 requires protection of this area through application of an effective ecological buffer. The policy further extends protection to green infrastructure along the Frenze Brook and surrounding the site.
- 9.5 At Roydon, DDNP06 (Site south of Roydon Primary School) lies at the fringe of the Habitat Network Enhancement Zone 2 with the potential to support ecological connectivity of the land surrounding Roydon Fen Local Nature Reserve (LNR). Residents at this site would be provided with direct access to the LNR via Tottington Lane and there is good tree coverage west of the site. The site allocation Policy DDNP06 (Site south of Roydon Primary School) seeks to ensure that development retains and enhances existing trees and hedgerows, provides a 10m landscape belt, protects dark skies, and provides pedestrian and cycle access to Roydon Lake (whilst minimising disturbance to identified green corridors). This is likely to ensure that long-term negative effects are avoided.
- 9.6 At Burston, the allocation site avoids any significant impacts in relation to biodiversity, avoiding designated and identified Priority habitats.
- 9.7 At Scole, the three allocation sites avoid any significant impacts in relation to biodiversity. Most of the area north and east of the settlement is identified land within the National Habitat Network, with a 'Network Expansion Zone' intersecting Site DDNP08 (Land east of Norwich Road, Scole), and a 'Network Enhancement Zone 2' intersecting DDNP09 (Land at Rose Farm off Bungay Road, Scole). The corresponding site allocation policies (Policies DDNP08 and DDNP09) could identify a preference for development which seeks to enhance ecological linkages in this area, recognising that the settlement is less connected to the identified green corridor network across the Plan area (and thus development is less likely to be captured by the provisions of Policy 5).
- 9.8 At Brome and Oakley, Site DDNP12 (Land north of the B1118, Lower Oakley) is recognised predominantly as Priority Habitat; 'Coastal and Floodplain Grazing Marsh'. Development at this site will ultimately result in the loss and fragmentation of the habitat (contained within the National Habitat Network) and minor negative effects can be anticipated in this respect. No direct mitigation or compensation is currently sought through the relevant site allocation policy (Policy DDNP12) and thus it is recommended that the policy provisions are extended to better address the likely impacts on biodiversity.
- 9.9 The provisions of Policy 5 (Green Corridors) and Policy 12 (Local Green Space) seek to support the retention and long-term protection of key habitats in the Plan area in future development. Biodiversity net gain is a requirement within two of the site allocation policies, and under Policy 5 (Green Corridors) it is a requirement for development within or adjacent to green corridors. Furthermore, the provisions of Policy 4 (Design) seeks to ensure that good design is demonstrated in development proposals through significant biodiversity enhancements.
- 9.10 Overall, the spatial strategy of the DDNP is deemed likely to lead to some habitat loss/ fragmentation and the loss of floodplain grazing marsh at Lower Oakley may be more difficult to directly compensate for given the nature of the

habitat as part of the floodplain in this area. As a result, **long term minor negative effects** are anticipated. Despite this, 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

- 9.11 In relation to climate change mitigation a primary consideration is the ability for development to support changes in travel patterns and a shift towards more sustainable forms of travel (i.e. public transport, walking, cycling and electric vehicles). The spatial strategy of the DDNP is in line with the strategic directions of the Local Plan, which includes larger scale growth within Diss as a 'Main Town' in the settlement hierarchy. This supports the aim to reduce the need to travel, by locating most development within the most accessible areas of the Plan area and wider District. Notably, development at Site DDNP01 (Land north of the Cemetery) is anticipated to deliver a new link road connecting Heywood Road and Shelfanger Road. Masterplanning of the site is required, which should seek to maximise opportunities for enhanced walking routes and cycle network connections. Furthermore, the proposed change of use at the 'Land west of Nelson Road and east of Station Road, Diss' (DDNP04) from employment to housing development (as a rolled over allocation site from the Local Plan) will provide new residents with excellent access to the railway station, with a new road connection required from Nelson Road to the station forecourt. Additional measures which seek to enhance and connect more areas with identified 'green corridors' in the Plan area (Policy 5) and deliver an extended riverside walking route at the 'Land off Park Road' (Policy DIS 2) should further promote walking locally. This is supported by the fact that many of the proposed development sites adjoin existing Public Rights of Way. The performance of the spatial strategy in relation to movement is explored further under the 'transportation' SEA theme.
- 9.12 A secondary consideration is the need to support delivery of low carbon infrastructure (e.g. a ground source heat network; or solar PV with battery storage) and/or high standards of sustainable design and construction, such that the development can achieve net zero or, at least, CO₂ emissions standards that exceed the requirements of Building Regulations. It is recognised that the DDNP does not directly address this issue through the policy framework, despite the identified aim to "*ensure that the need to address climate change runs through all aspects of the Plan*". By promoting large-scale growth at a single site in Diss, it is recognised that through economies of scale, development has far greater potential to realise sustainability improvements over and above that set by Building Regulations where feasible. In this respect, it is recommended that the potential sustainability standards in major development proposals are explored in greater detail, and where appropriate supported by additional policy provisions, prior to finalisation of the DDNP.
- 9.13 In relation to climate change adaptation, a key consideration is existing and future flood risk. Fluvial flood risk in the Plan area follows the River Waveney and Frenze Beck, with extensive areas of high risk in the land between Diss and Scole. Of the sites allocated in the DDNP, the rolled over allocation site DIS2 (Land off Park Rd, Diss) is in an area of low fluvial flood risk, and under

Policy DIS2 development in Flood Zone 1 is identified as acceptable in principal at the site. Whilst not identified as an area of flood risk, it is recognised that DDNP03 (Diss Leisure Centre) and DDNP12 (Land north of the B1118, Lower Oakley) are located adjacent to the River Waveney, where development should give due consideration to future flood risk. Furthermore, small waterbodies intersect both DDNP01 (Land north of the Cemetery, Diss) and DDNP11 (Land north east of Ivy House, Brome) where appropriate flood risk assessment should be undertaken. These requirements will be captured by the NPPF and Local Plans.

- 9.14 Surface water flood risk is more extensive across the Plan area and most of the allocation sites at least intersect an area of low surface water flood risk. Most notably, sites DDNP04 (Land west of Nelson Rd and east of Station Rd, Diss) and DIS2 (Land off Park Road, Diss) contain extensive areas of low, medium and high surface water flood risk, where the appropriate application of sustainable drainage systems will be crucial to reducing risks to people and property. Also, Site DDNP11 (Land west of Norwich Rd, Scole) intersects an area of high surface water flood risk along Low Road, where development should seek to address any flood risk issues associated with access to the site and identify opportunities to reduce surface water flood risk in these areas. Whilst a need to address surface water flood risk constraints are identified under some of the allocation site policies, the benefit of additional policy provisions which seek development that realises any potential opportunities to improve drainage and surface water run-off is recognised. This is particularly relevant to site access and road infrastructure development in the Plan area, ensuring long-term safe and secure access for future residents, and potentially reducing impacts for existing residents.
- 9.15 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 potentially scope to raise the expected sustainability performance of major development proposals at Diss. Whilst no significant effects are anticipated in relation to flood risk as a result of the proposed spatial strategy, it is recognised that additional adaptation benefits could be sought through development that realises opportunities to improve drainage, particularly within the existing road infrastructure network.

Landscape

- 9.16 The landscape of the Plan area is largely shaped by the River Waveney and maintains a strong rural character. Most growth is directed to Diss (in line with the Local Plan requirements), and notably this includes the large development site in the north of the settlement; DDNP01 (Land north of the Cemetery).
- 9.17 Diss is strongly associated with a high ridge of raised land to the north of the Waveney Valley. The location of DDNP01 means development has the potential to affect long distance views northwards from the cemetery, impact the bridleway passing through the site and impact views into the site from the adjacent footpath. Development of the greenfield site will ultimately encroach upon the surrounding countryside, and long-term minor negative effects are considered likely as a result. The site allocation policy (Policy DDNP01) seeks

master-planning of the large site, delivering a coordinated landscape approach incorporating biodiversity net gain and habitat enhancement or creation to strengthen the links with the identified green corridors across the Plan area (as identified in Policy 5). Supported by the provisions of Policy 4 (Design) which seeks development that reinforces local distinctiveness, this should serve to minimise negative effects. In particular, Policy 4 recognises the need for development to consider where applicable its edge of settlement location and transition to the open countryside.

- 9.18 The DDNP also seeks to utilise brownfield land opportunities where these are available, including at; DDNP02 (Site of derelict Victorian Infant School, the Causeway), DDNP03 (Diss Leisure Centre) and DDNP04 (Land west of Nelson Rd and east of Station Rd) to deliver a proportion of the required housing. Brownfield development will ultimately reduce impacts on the countryside; but will need to be designed to contribute to the townscape setting and historic settlement character. In this respect, the provisions of Policy 4 (Design) should ensure that development integrates with the settlement form by expecting a sensitive response to local characteristics and materials, demonstrating an understanding of local design character and density. This includes the higher density residential development found in and around Diss town centre. Ultimately, Policy 4 states that “*design of poor quality will not be supported.*”
- 9.19 With the permitted development at DDNP05 (Land north of Nelson Rd) and with DIS1 – DIS3, DIS6 – 7, and DIS9 being rolled over allocations from the local plan, no significant landscape impacts are anticipated in development, given that development of the sites has already been found acceptable in principal. Despite this, the relevant site allocation policies seek to ensure that development provides appropriate landscaping and boundary treatment and seeks to protect and enhance green infrastructure links and assets.
- 9.20 At Roydon, development is focused south of Roydon Primary School (Policy DDNP06) between Old High Road and the A1066. The site provides good opportunity for screening which could minimise the landscape impacts of development; however, development in this location will contribute to coalescence with Diss. Despite this, the site avoids the proposed ‘strategic open gap’ between Diss and Roydon and supported by the provisions of Policy DDNP06 which seeks to ensure “*adequate separation, in accordance with the strategic gap identified in Policy 11, is maintained between the development and Long Meadow properties*” no significant effects are considered likely.
- 9.21 At Burston, the proposed allocation at the ‘Land west of Gissing Road’ (Policy DDNP07) is expected to deliver open green space alongside housing development to connect with the adjacent green corridor, as well as landscaping which minimises impacts on heritage settings. Supported by the provisions of Policy 4 (Design) no significant negative effects are considered likely in development.
- 9.22 At Scole, the proposed development is relatively contained in the river valley and includes development of brownfield land opportunities. Development effects are likely to relate more predominantly to the historic townscape.
- 9.23 The landscape south of the Waveney is recognised in saved Local Plan policies as a ‘Special Landscape Area’ (though this is soon to be replaced by the provisions of the emerging JLP). Despite this, the small-scale allocation sites in

Brome and Oakley are not considered likely to lead to any significant effects, delivering 10 or less homes at the individual sites.

- 9.24 Landscape considerations are embedded further through the proposed policies of the DDNP. Notably, Policy 13 seeks to identify and protect important local views which add to landscape character and visual amenity. Additionally, the provisions of Policies 5 (Green Corridors) and 12 (Local Green Space) seek to extend and enhance green infrastructure networks in the Plan area. Furthermore, the proposed strategic open gap between Diss and Roydon will provide long-term support in retaining countryside access and the rural character of the settlements.
- 9.25 Overall, the policy provisions of the DDNP seek to reduce the impact of the proposed spatial strategy (i.e. allocation sites). Despite this, the development of greenfield land at edge of settlement locations is considered likely to lead to residual **minor long-term negative effects**.

Historic environment

- 9.26 The Plan area contains a rich variety of both designated and non-designated heritage assets and each settlement has its own identity and historic values. In relation to the allocation sites, many are constrained by designated heritage assets. At Diss, notably, DDNP02 (Site of derelict Victorian Infant School, the Causeway) lies within the Diss Conservation Area, and adjacent to the Listed Buildings which line Mere Street. Mere Street leads directly north to the Diss Heritage Triangle. Policy DDNP02 identifies that the old school building is to be retained and development “*will need to be sensitive to the historic character of the area*”.
- 9.27 Furthermore, Sites DIS2 (Land off Park Road, Diss) and DDNP03 (Diss Leisure Centre) lie close to Diss Conservation Area, and near to Listed Buildings. Notably at Site DIS2, the site lies adjacent to the row of Listed Buildings along Denmark Street. In addition, the Norfolk Historic Environment Record (HER) identifies non-designated assets in Diss and in this respect, Site DDNP01 (Land north of the Cemetery) contains the non-designated asset the ‘Royal Observer Corps. post building’. Site DDNP05 (Land north of Nelson Road) lies within an identified ‘Archaeology Area’, with Site DDNP04 (Land west of Nelson Road and east of Station Road) lying adjacent to this same area. Site DIS3 also lies opposite an ‘Archaeology Area’; with multi-period finds including probable Iron Age defended settlement.
- 9.28 The site allocated within Roydon (DDNP06 Site south of Roydon Primary School) is not constrained by designated heritage assets. However, it is recognised that the Norfolk HER identifies Roydon Primary School as a non-designated asset.
- 9.29 At Burston, Site DDNP07 (Land west of Gissing Road) lies adjacent to the Grade II listed Manor House Farmhouse, where appropriate screening and consideration to the heritage setting will be required.
- 9.30 At Scole, site DDNP10 (Former Scole Engineering Site, Diss Road) lies within the Scole Conservation Area, opposite the large Scheduled Monument ‘Scole Roman Settlement’ and ‘Archaeology Area’. Site DDNP08 (Land east of

Norwich Road) is near the Scole Conservation Area and the Grade II listed Thatchet, where access to the site has the potential to affect its setting.

- 9.31 The allocated site at Brome (DDNP11 Land north east of Ivy House) lies behind the listed buildings that line The Street, with Ivy House being Grade II listed. The whole farmstead is further recognised as a non-designated asset in the Norfolk HER. At Oakley, the allocated sites (DDNP12 Land north of the B1118, and DDNP13 Land south of the B1118) will see development surround the Grade II listed Weaver's Cottage to the north and west.
- 9.32 Whilst some of the corresponding site allocation policies identify designated assets, Policy DDNP14 (Designated and Non-Designated Heritage Assets) and its supporting text provide the main context for development in relation to the historic values of the Plan area. Non-designated assets at each of the settlements are identified in the supporting text, and Policy 14 seeks development which protects and where possible, enhances, "*the character, integrity and appearance of existing heritage assets*". Furthermore, development "*affecting listed buildings should not harm the significance of the heritage asset and should preserve its character and appearance*". The policy identifies that development should avoid harm to non-designated assets, having regard to their "*character, important features, setting and relationship with surrounding buildings or uses*". Works to an existing designated or non-designated are further required to be supported by a Heritage Statement detailing any proposed mitigation. Additionally, proposals adjacent to non-designated assets are required to demonstrate due consideration of the asset, distinctive historic features, positive elements of its setting that contribute to the significance of the asset, and the contribution that the asset and its setting makes to the character of the local area.
- 9.33 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

- 9.34 Given a lack of detailed land classification surveying in the Plan area, there is a need to rely on provisional national datasets to inform the judgements made in relation to effects on soil resources. In this respect, the national data indicates that most of the land surrounding the settlements in the Plan area is 'grade 3' quality land. However, the dataset is very low resolution and does not differentiate between grade 3a (which is classed as best and most versatile) and grade 3b (which is not classed as best and most versatile). The only lower grade agricultural land is associated with the river. Despite this, many of the proposed allocation sites appear to be in agricultural use, and the loss of such resources to housing development is inevitably considered likely to lead to long-term minor negative effects.
- 9.35 Despite this, it is recognised that the DDNP includes an element of brownfield development in both Diss and Scole, positively supporting the efficient use of

land and prioritising development at lower quality land resources. In some areas, the potential for contaminated land is identified (e.g. Policy DIS 9 and Policy DDNP05) and under the site allocation policies appropriate remediation is required. The remediation of contaminated land is considered for long-term positive effects in relation to land and soil resources.

- 9.36 Furthermore, parts of the Plan area contain safeguarded mineral resources, and the site allocation policies (e.g. Policy DDNP04) identifies the need for development to comply with the relevant minerals planning policies. In this respect, it is considered likely that significant effects will be avoided.
- 9.37 Two site allocations (DDNP01 Land north of the Cemetery, Diss and DDNP11 Land north east of Ivy House, Brome) either contain or lie adjacent to waterbodies, where appropriate consideration and mitigation of development impacts on water quality should be fully established prior to development. It is recognised that these constraints could be better reflected in the relevant site allocation policies.
- 9.38 The DDNP area is served by Anglian Water Services (AWS). The Environment Agency have identified areas of relative water stress and the whole of AWS' supply area is shown as an area of 'Serious' water stress, based upon the amount of water available per person both now and in the future.¹⁵
- 9.39 Anglian Water's Water Resource Management Plan (WRMP)¹⁶ identifies that the supply-demand balance is under significant pressure from population growth, climate change, sustainability reductions and the need to increase resilience to severe drought. These challenges are acute in the East of England region given low rainfall combined with a significant proportion of wetland sites of conservation interest. An additional 294 Ml/d is required by 2045; the equivalent of more than a quarter of the average daily distribution input in 2017-18. Furthermore, a significant proportion of these needs will be required by 2025. The Plan prioritises demand management, whilst also investing in supply, with particular focus on the period up to 2025. The planned new infrastructure and improvements to the existing supply chain will manage the long-term impacts on water resources associated with growth. Most notably, the growth strategy of the DDNP does not significantly exceed that planned for in the emerging Local Plans and consulted upon with AWS.
- 9.40 Overall, 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

- 9.41 In relation to housing delivery, the DDNP provides an element of flexibility by slightly exceeding the housing requirement for 240 homes in Diss and identifying land for 255 dwellings. This is particularly relevant given the current

¹⁵ Environment Agency (2013) Water stressed areas – final classification [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf

¹⁶ Anglian Water (2019) Water Resources Management Plan 2019 [online] available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>

uncertainty in relation to DDNP03 (Diss Leisure Centre), where it is recognised that a suitable relocation site has yet to be found before any development at the site can take place. The leisure centre site is rightfully prioritised as a brownfield land opportunity, recognising the strategic commitment in place to relocate and extend the provision offer. However, inevitably there is an element of risk in relation to the site being made available within the Plan period. As a result, the additional flexibility provided ensures sufficient provision of land to avoid any significant effects arising in this respect.

- 9.42 With much of the growth directed to one large site in Diss, the Plan is recognised for the potential to capture a decent proportion of affordable housing in future growth. Policy DDNP01 requires 33% of the 200 homes at the 'Land north of the Cemetery' to be affordable. Furthermore, Policy 3 (Affordable housing) recognises the relatively high need for Social Rented homes in the Plan area and seeks to ensure this features as part of the tenure mix of affordable housing. The policy outlines further tenure preferences to guide future development.
- 9.43 The allocations are supported by the provisions of Policy 2 (Housing mix) which seeks to ensure that development provides a mix of housing types and sizes or show that they are meeting specific housing needs. This includes supporting the need for one- and three-bedroom homes, homes for the elderly, and homes suitable for younger generations.
- 9.44 With most growth located in Diss, future residents will be supported with relatively good access to a range of services and facilities, with Diss recognised as a 'Main Town' in the settlement hierarchy. Growth in the surrounding settlements is relatively small-scale, meeting local needs and supported by the provisions at Diss. Furthermore, the DDNP provides notable support for the development of walking and cycling networks as well as green infrastructure corridors which extend the Plan area. Policies 5 (Green Corridors) and 7 (Walking and Cycling Network) recognise an identified network of routes which are subsequently prioritised for future investment.
- 9.45 Additional benefits for local communities are expected through the provision of new cemetery space within Diss (Policy DDNP01), areas of new open space being delivered alongside development at many of the allocation sites, and a new link road in the north of Diss (Policy DDNP01).
- 9.46 Furthermore, the proposed 'strategic open gap' between Diss and Roydon will ultimately serve to retain the distinct and separate settlement and community identities. Supported by high quality design (Policy 4), the protection of important views (Policy 13) and protection of the historic values of each settlement; residents are likely to continue to be supported by a high-quality living environment.
- 9.47 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

- 9.48 With most growth focused in Diss the growing population are provided with relatively good access to existing healthcare facilities. These facilities extend support to the residents of surrounding settlements. Hospital services are also relatively well located just outside of the Plan area at Eye.
- 9.49 Recognisable health benefits for residents are also identified through the provisions of the DDNP, which, under Policy 12, identifies and protects areas of Local Green Space supporting recreational needs. Furthermore, the policy seeks to enhance the accessibility of these areas, particularly through linking sites as part of identified accessible 'green corridors' (Policy 5) integrating both people and nature to provide attractive walking and cycling routes.
- 9.50 Further support for active lifestyles is provided through the promotion of a walking and cycling network across the Plan area, identified through Policy 7, with development contributions and future investment targeted at improving this network.
- 9.51 The Plan area has retained its rural character and supported by the provisions of Policy 4 (Design) development is expected to integrate and respond sensitively to character traits which include access to the surrounding countryside and the existing network of Public Rights of Way (PRoW). Notably, the proposed sites, on the whole, connect well with the existing PRoW network.
- 9.52 Whilst the site of the existing Leisure Centre is allocated for redevelopment, it is recognised that there are long term strategic plans to relocate this facility in Diss. Policy 8 (Diss Leisure Centre) identifies the priority for a new location which provides "*good access for people choosing to walk or cycle*" as well as accommodating vehicle parking needs. Identification of an appropriate relocation site would ultimately enhance the potential for long-term positive effects, and the DDNP may wish to further consider the potential to identify an appropriate site as part of the planning framework; perhaps even as a reserve site if it is not considered likely to be made available within the Plan period.
- 9.53 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 (as proposed through the DDNP). On this basis, **minor long-term positive effects** are considered likely. It is recognised that there is the potential to enhance positive effects, by identifying an appropriate relocation site for the leisure centre through the planning framework.

Transportation and movement

- 9.54 The known road network capacity and congestion issues along the A1066 and Vince's Road in Diss are ultimately expected to be exacerbated by the strategic level of growth proposed through the DDNP (and set by the emerging GNLP). The Diss Network Improvement Strategy¹⁷ identifies that even with the provision of a new link road in the north or south of Diss, traffic conditions within

¹⁷ 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>

the town are expected to worsen. Long-term negative effects are anticipated in this respect, with or without the DDNP.

- 9.55 The new allocations proposed in Diss in the DDNP equate to a total of 255 homes, delivering 15 more dwellings than the residual requirement, and potentially exacerbating effects further in this respect. Growth in Scole will also slightly exceed the identified need for new homes, and cumulatively add to congestion effects on the A1066 further east. Similarly, growth in Roydon is expected to add to congestion effects on the A1066 west. This is considered alongside the recognised fact that residents of the surrounding settlements will continue to drive to Diss to access a wider range of goods and services.
- 9.56 To combat the expected effects on the road network in the Plan area, Policy 6 recognises the need for “*engineering solutions to improve capacity at key junctions*” prior to significant growth. Furthermore, the DDNP seeks a new link road in the north of Diss (Policy DDNP01) linking Heywood Road and Shelfanger Road. Masterplanning of the large site proposed in the north of Diss is required, which should seek to maximise opportunities for enhanced walking routes and cycle network connections. Furthermore, the proposed change of use at the ‘Land west of Nelson Road and east of Station Road, Diss’ (DDNP04) from employment to housing development (as a rolled over allocation site from the Local Plan) will provide new residents with excellent access to the railway station, with a new road connection required from Nelson Road to the station forecourt. This is supported by the provisions of Policy 7 (Walking and Cycling Network) which target development contributions and future investment at an identified network of walking and cycling routes extending the Plan area. Policy 5 provides further support in enhancing public access to a network of identified green corridors, promoting a network of attractive walking and cycling routes which integrate people and nature.
- 9.57 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 the **positive effects** of reducing the impacts of future growth (the level of which has been determined through the Local Plan).

Cumulative effects

- 9.58 The strategic growth in Diss is likely to provide support to some degree for the surrounding settlement areas. For example, through improved access, including access by ‘green corridors’ and further inward investment in the infrastructure of the Main Town. Minor long-term positive cumulative effects can be anticipated in this respect. The promotion of biodiversity enhancement across the development sites are also considered for the potential to lead to overall net gain and positive cumulative effects in this respect.

- 9.59 Despite this, it is recognised that there will a negative cumulative impact in relation to landscape; through the cumulative loss of greenfield land and encroachment upon the countryside. Cumulatively, designated and non-designated heritage settings are likely to come under pressure from development in the settlements, however, the policy provisions of the NPPF, Local Plan and DDNP are considered likely to ensure that any cumulative effects are not of significance.
- 9.60 Overall, the provisions of the DDNP supplement the provisions of the local plans, to provide additional local protections for assets, features and characteristics of value, and identify opportunities for development to address known issues or deliver community benefits. As a result, overall positive cumulative effects are considered likely.

10. Conclusions and recommendations

Conclusions

10.1 The following conclusions are drawn for each of the SEA themes:

Biodiversity	Overall, the spatial strategy of the DDNP is deemed likely to lead to some habitat loss/ fragmentation and the loss of floodplain grazing marsh at Lower Oakley may be more difficult to directly compensate for given the nature of the habitat as part of the floodplain in this area. As a result, long term minor negative effects are anticipated. Despite this, 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	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 potentially scope to raise the expected sustainability performance of major development proposals at Diss. Whilst no significant effects are anticipated in relation to flood risk as a result of the proposed spatial strategy, it is recognised that additional adaptation benefits could be sought through development that realises opportunities to improve drainage, particularly within the existing road infrastructure network.
Landscape	Overall, the policy provisions of the DDNP seek to reduce the impact of the proposed spatial strategy (i.e. allocation sites). Despite this, the development of greenfield land at edge of settlement locations is considered likely to lead to residual minor long-term negative effects .
Historic environment	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	Overall, 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	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	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 (as proposed through the DDNP). On this basis, minor long-term positive effects are considered likely. It is recognised that there is the potential to enhance positive effects, by identifying an appropriate relocation site for the leisure centre through the planning framework.
Transportation	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 the **positive effects** of reducing the impacts of future growth (the level of which has been determined through the Local Plan).

Recommendations

10.2 The appraisal of the draft DDNP has identified the followings recommendations which seek to minimise the potential for negative effects and maximise the potential for positive effects in relation to the relevant SEA themes:

- **Biodiversity** – it is recommended that the impacts for biodiversity in the loss and fragmentation of floodplain grazing marsh Priority Habitat at site allocation DDNP12 are considered in more detail through the policy framework. Appropriate compensation should be sought as a minimum.
- **Climate change** – two recommendations are made in relation to climate change. The first recognises the potential for the DDNP to support a higher sustainability standard in major development proposals in Diss and recommends that policy provisions seek more from proposals at site allocation DDNP01. The second recommendation identifies the potential benefit of additional policy provisions which seek to ensure that development at the allocation sites identifies any opportunity (where these exist) to improve surface water run-off rates, particularly in the creation of new site access and egress points where there is known high surface water flood risk on adjacent roads.
- **Health and wellbeing** – it is recognised that there is the potential to enhance positive effects in relation to health and wellbeing, by identifying an appropriate relocation site for Diss Leisure Centre within the planning framework of the DDNP.

Part 3: What are the next steps?

11. Next steps

- 11.1 This part of the report explains the next steps that will be taken as part of plan-making and SEA.

Plan finalisation

- 11.2 Following consultation, responses will be considered before the Plan and SEA Environmental 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.
- 11.3 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 Plan Area.

Monitoring

- 11.4 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.
- 11.5 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.

Appendices

Appendix A Regulatory requirements

As discussed in **Chapter 1**, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. **Table AA.1** overleaf links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table AA.2** explains this interpretation. **Table AA.3** identifies how and where within the Environmental Report the regulatory requirements have/ will be met.

Table AA.1: Questions answered by this Environmental Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the Environmental Report must include...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
		What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the SEA scope?	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1		What has plan-making / SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2		What are the SEA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3		What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table AA.1: Questions answered by this Environmental Report, in-line with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	The environmental characteristics of areas likely to be significantly affected	i.e. answer - <i>What's the scope of the SA?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues & objectives?</i>
(i) a description of the measures envisaged concerning monitoring.	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table AA.2: 'Checklist' of how (throughout the SEA process) and where (within this report) regulatory requirements have been, are and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 ('What is the plan seeking to achieve') presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The 'SEA framework' – the outcome of scoping – is presented within Chapter 3 ('What is the scope of the SEA?'). More detailed messages, established through a context and baseline review are also presented in Appendix B of this Environmental Report.
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The SEA framework is presented within Chapter 3 ('What is the scope of the SEA'). Also, Chapter 3 presents key messages from the context review. <i>With regards to explaining "how...considerations have been taken into account", Chapter 7 explains the Steering Group's 'reasons for supporting the preferred approach', i.e. explains how/ why the preferred approach is justified in light of alternatives appraisal.</i>
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives appraisal findings (in relation to housing and employment growth, which is a 'stand-out' plan policy area). Chapter 9 presents an appraisal of the plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g. timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment seeks to highlight where certain tensions between competing objectives may exist, which might potentially be actioned by the Examiner, when finalising the plan. Specific recommendations are made in Chapter 10.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with 'reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapter 7 explains the Steering Group's 'reasons for selecting the preferred option' (in light of alternatives assessment).

Regulatory requirement**Discussion of how requirement is met**

9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
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10. A non-technical summary of the information provided under the above headings	The NTS is provided at the beginning of this Environmental Report.
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The SA Report must be published alongside the Draft Plan, in accordance with the following regulations

authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	At the current time, this Environmental Report is published alongside the 'pre-submission' version of the DDNP, with a view to informing Regulation 14 consultation.
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The SA must be taken into account, alongside consultation responses, when finalising the plan.

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	Assessment findings presented within this Environmental Report, and consultation responses received, have been (and will continue to be) fed back to the Steering Group to inform plan finalisation.
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Appendix B Scoping information

This appendix presents the baseline information and policy review that has informed the identification of key issues and SEA objectives as presented in Chapter 3 of the Environmental Report.

It was established at scoping that for the purposes of this SEA, the air quality theme has been scoped out of the proposed framework.

Scoping consultation was undertaken during the period Tuesday 16th March to Tuesday 20th April 2021. The responses received are identified in **Table AB.1** below. No response was received from the Environment Agency

Table AB.1 Scoping consultation responses

Scoping consultation response	SEA update/ response
Natural England	
Corben Hastings, Consultations Team	
It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.	Noted with thanks.
Historic England	
Edward James, Historic Places Advisor	
Thank you for your email requesting a scoping opinion for the Diss and District Neighbourhood Plan SEA.	Noted, with thanks.
We note that this document refers to Good Practice Advice Note 3: The Setting of Heritage Assets. However, we would also refer you to Historic England Advice Note 3: Site Allocations and Local Plans. This advice note sets out what we consider to be a robust process for assessing the potential impact of any site allocations that the DDNP brings forward on any relevant heritage assets. In particular we would highlight the Site Selection Methodology set out on Page 5. This is similar to the methodology used to assess potential impacts on the setting of heritage assets (Good Practice Advice 3) but is focused specifically on the site allocation process and is therefore more suitable for use within the SEA assessment process.	
We would expect a proportionate assessment based on this methodology to be undertaken for any site allocation where there was a potential impact, either positive or negative, on a heritage asset, and the SEA consequently to advise on how any harm should be minimised or mitigated. Advice Note 3 can be found here: https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/	noted, with thanks.
We welcome the Scoping Report's identification of key designated heritage assets, as well as the opportunity for enhancement of the same that the DDNP represents.	Noted, with thanks.
We also welcome the identification of the key evidence gap caused by the lack of conservation area appraisal for Burston	Noted with thanks. The draft Burston Conservation Area

Scoping consultation response

SEA update/ response

Conservation Area. We would recommend that an appraisal or historic area assessment of the conservation is undertaken as a matter of priority, to avoid the SEA and DDNP failing to be supported by a suitably robust evidence base.

Appraisal has since been made available.

Historic England strongly advises that the conservation and archaeological staff of the relevant local planning authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), which should be consulted as part of the SEA process. In addition, they will be able to advise how any site allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Noted, with thanks.

For further general advice, we would refer you to the advice in Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment, which can be found here: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>.

Noted, with thanks.

This advice sets out the historic environment factors which need to be considered during the Strategic Environmental Assessment or Sustainability Appraisal process, and our recommendations for information you should include.

To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SEA, these would have an adverse effect upon the environment.

Noted, with thanks.

Biodiversity

Policy context

Table AB.2 presents the most relevant documents identified in the policy review for the purposes of the DDNP SEA.

Table AB.2: Plans, policies and strategies reviewed in relation to biodiversity

Document Title	Year of publication	Weblink
National Planning Policy Framework (NPPF)	2019	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf
The 25 Year Environment Plan	2018	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf
Suffolk's Nature Strategy	2015	https://www.suffolk.gov.uk/planning-waste-and-environment/suffolks-countryside-and-wildlife/protecting-the-environment/suffolk-nature-strategy/

Document Title	Year of publication	Weblink
Regulation 19 'Pre-Submission' Draft GNLP	2021	https://www.gnlp.org.uk/
Regulation 19 'Pre-Submission' draft Babergh and Mid Suffolk Joint Local Plan	2020	https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-r19-pre-submission/

The key messages emerging from the review are summarised below:

- The DDNP will be required to be in general conformity with the NPPF, which provides significant emphasis on improving biodiversity and securing measurable net gains in development, alongside protection and conservation of designated sites and important species and habitats. This includes utilising a strategic approach to maintaining and enhancing networks of habitats and green infrastructure at the wider catchment or landscape scale. Support is given to establishing coherent ecological networks that are more resilient to current and future pressures, particularly in consideration of climate change.
- Over the past decade policy (e.g. The Natural Environment White Paper and Biodiversity 2020) has demonstrated a move away from the traditional approach of protecting biodiversity, to a wider landscape approach to enhancing biodiversity, as part of the overall aims to halt biodiversity loss. The 25 Year Environment Plan places emphasis on improvements to the natural environment; identifying the need to “*replenish depleted soil, plant trees, support wetlands and peatlands, rid seas and rivers of rubbish, reduce greenhouse gas emissions, cleanse the air of pollutants, develop cleaner, sustainable energy and protect threatened species and habitats.*” Working at a landscape scale transformation is expected to connect habitats into larger corridors for wildlife.
- The emerging Environment Bill will provide further provisions in relation to biodiversity when granted royal assent. The Bill will set parameters for biodiversity gain as a condition of planning permission, as well as biodiversity gain site registers and biodiversity credits. The Bill identifies a general duty to conserve and enhance biodiversity, including through biodiversity reports and local nature recovery strategies. Local nature recovery strategies will identify biodiversity priorities for the strategy area as well as a local habitat map. Furthermore, habitat maps are expected to include recovery and enhancement areas which are or could become of importance for biodiversity.
- Suffolk’s Nature Strategy identifies nature priorities in relation to the natural environment, economic growth and health and wellbeing. Recommendations and actions are identified under these broad themes, relating specifically to protected sites, landscapes, habitats and species, green spaces, woodland and forestry, climate change, infrastructure, tourism, agriculture, water management, education and neighbourhood plans. Specifically, Recommendation 26 identifies the opportunity for neighbourhood plans to conserve, enhance and link Suffolk’s green and natural spaces.

- The DDNP will also be required to be in general conformity with the Local Plans covering the DDNP area which contain policies directly relating to biodiversity and geodiversity.

Baseline review

There are no internationally or nationally designated sites within the Plan area, however there are many sensitive sites surrounding the parishes (as depicted in **Figure AB.1** at the end of the baseline summary).

With regards to internationally designated sites, of note is the **Redgrave and South Lopham Fens Ramsar site**, and the **Waveney & Little Ouse Valley Fens Special Area of Conservation (SAC)**; which cover the same site area west of Roydon. This area (roughly 3.6km from the closest edge of Roydon as the crow flies) is also nationally designated as the **Redgrave and Lopham Fens Site of Special Scientific Interest (SSSI)** and the **Redgrave and Lopham Fens National Nature Reserve (NNR)**.¹⁸ The multiple designations indicate the high values associated with the site, in terms of supporting biodiversity and providing access to nature.

The site is over 127ha in size and an extensive example of lowland base-rich valley fen; remarkable for its lack of fragmentation. The spring-fed valley fen lies in the headwaters of the River Waveney and is the largest fen in lowland England. A variety of habitats exist here, including dry birch woodland, scrub and carr, floristically-rich fen grassland, mixed fen, wet heath, reed, and internationally important saw sedge beds and purple-moor grassland. The habitats support many rare and scarce invertebrates; providing the only British locality for the Fen Raft Spider. The whole site is considered to be in an ‘unfavourable – recovering’ condition.¹⁹

Closer to the Plan area, the nationally designated **Wortham Ling SSSI** lies adjacent to the western boundary; intersecting both Roydon and Palgrave parishes. The site provides over 50ha of lowland dry heath and acid grassland habitats, with damper areas providing further examples of purple moor-grass. The site also supports a good population of characteristic open heathland butterflies. The whole area is in a ‘favourable’ condition.²⁰

Also adjacent to the Plan area is the **Gypsy Camp Meadows, Thrandeston SSSI** south of Palgrave. The site covers an area of around 2.4ha and represents one of the few remaining wet meadow sites in Suffolk. There are also areas of drier grassland and additional habitats for plants and invertebrates are provided by hedgerows within the site. Whilst 13.83% of the site is in a ‘unfavourable – recovering’ condition, the majority of the site (86.17%) is considering to be in an ‘unfavourable – no change’ condition.²¹

The sites referred to above are particularly sensitive to changing water levels (particularly from abstraction) and recreational activities likely to damage or disturb features of interest.²²

¹⁸ DEFRA (2021) Magic Map Application [online] available at: <https://magic.defra.gov.uk/magicmap.aspx>

¹⁹ Natural England (2021) Designated Sites Viewer [online] available at: <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>

²⁰ Ibid.

²¹ Ibid.

²² Ibid.

Slightly further from the Plan area boundary in the east also lies the **Hoxne Brick Pit SSSI**. At around 1.26ha the area provides a world-famous geological site where research dates back to the 18th Century, demonstrating one of the most important Pleistocene sites in Britain. The upper series of largely fluvial deposits at the site contain abundant vertebrate material attributable to late Hoxnian and Wolstonian Stages. Finds include fishes, voles, Norway lemming, extinct beaver, horse, several deer and a macque. The majority of the site (69.38%) is in a 'favourable' condition, however; notably 30.62% of the site is in an 'unfavourable – declining' condition.²³ Given its distance from the main settlement areas, the geological site is not considered likely to be affected by the proposals of the DDNP.

Impact Risks Zones (IRZs) have been identified in the areas surrounding designated SSSIs, and these encompass most of the settlement areas in the DDNP area. The settlement area at Scole is the least constrained, with only the south eastern extent of the built-up area falling within an IRZ. At most settlements that fall within an IRZ, residential development is not an identified trigger for impacts which requires further consultation. However, in areas of Roydon and Palgrave, residential development of 100 or more homes within the settlement, or 50 homes or more at the rural edge/ in the countryside; are identified as proposals which would require further consultation with Natural England.

Within the Plan area itself, the **Roydon Fen Local Nature Reserve (LNR)** and Local Wildlife Site (LWS) lies south of the Roydon main settlement area, and east of Diss settlement area (adjoining it at Tottington Lane). The site provides roughly 20ha of extensive wetland with identified walking trails. The western end is dominated by woodland, whilst mown fen areas are maintained in the east. Classic fen species can be found which include marsh helleborine, marsh fragrant orchid and saw sedge, as well as ragged robin, quaking grass, yellow rattle and glow-worms.²⁴

A range of grassland, wetland, woodland and other **Priority Habitats** also exist within the DDNP area, as follows:

- Coastal and Floodplain Grazing Marsh;
- Lowland Calcareous Grassland;
- Good quality semi-improved grassland (non-priority);
- Lowland Fens;
- Deciduous Woodland (including areas of Ancient Woodland);
- Woodpasture and Parkland; and
- Open Mosaic Habitat.

Much of the Palgrave, Roydon, and Scole parishes, as well as smaller parts of Diss, Stuston and Brome and Oakley parishes, also contain areas identified as part of a **Habitat Network Enhancement/ Expansion Zone** (Zones 1 and 2). These zones are identified as areas likely to be suitable for habitat recreation supporting nearby Priority Habitats, or new habitat creation (including suitable green infrastructure). With the network created tightly around existing patches of habitat, biodiversity enhancement in these areas is aimed at building greater ecological resilience across the wider landscape.

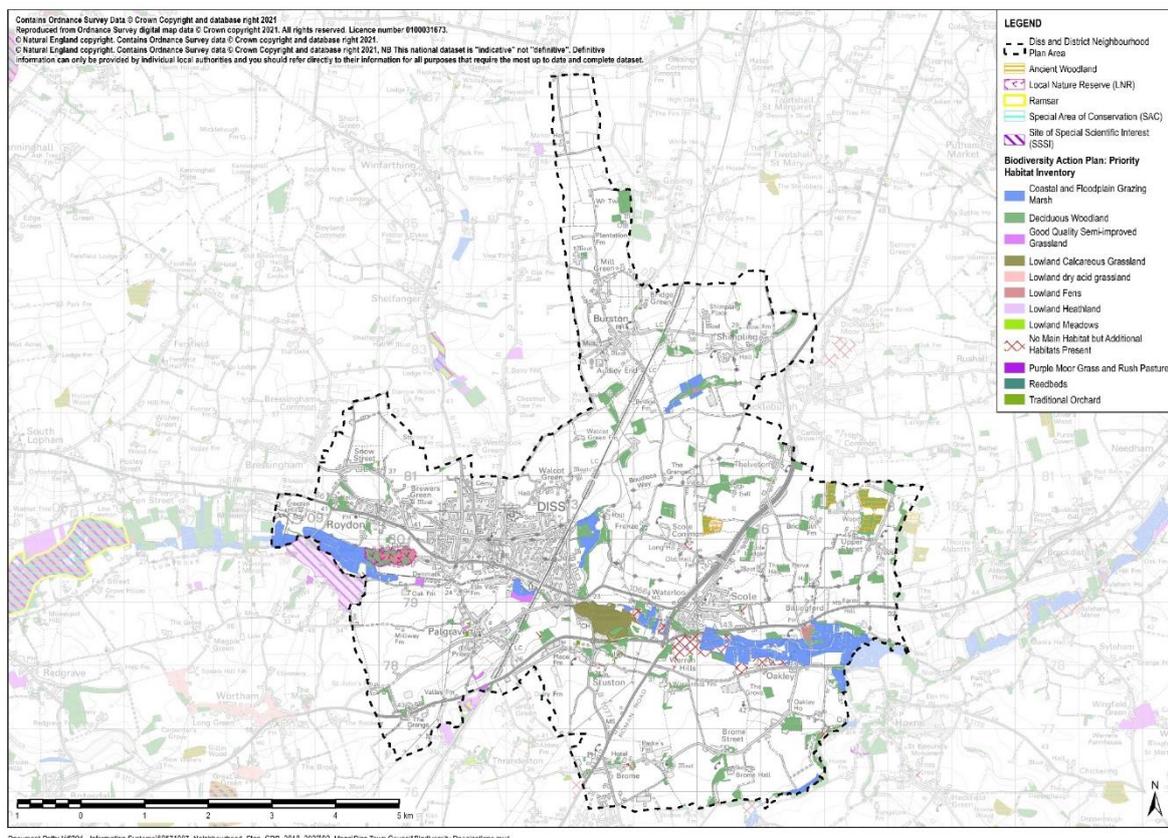
²³ Ibid.

²⁴ Suffolk Wildlife Trust (2021) Roydon Fen Nature Reserve [online] available at: <https://www.suffolkwildlifetrust.org/roydonfen>

Future baseline

All designated sites will continue to be afforded protection through the NPPF and Local Development Frameworks. Locally designated sites and important habitats are those most likely to come under pressure in future development in the DDNP area. The DDNP provides the opportunity to ensure that future growth over the Plan period minimises direct effects such as habitat fragmentation, and indirect effects such as recreational pressures, noise, light and air pollution. Furthermore, the Plan provides scope to identify opportunities for enhancement. These could be measures that the local community support, measures to target areas identified as part of a Network Enhancement or Expansion Zone, and measures which address the effects of climate change and support ecological resilience.

Figure AB.1: Biodiversity designations



Climate change

Policy context

Table AB.3 presents the most relevant documents identified in the policy review for the purposes of the DDNP SEA.

Table AB.3: Plans, policies and strategies reviewed in relation to climate change

Document Title	Year of publication	Weblink
National Planning Policy Framework (NPPF)	2019	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

Document Title	Year of publication	Weblink
Clean Air Strategy	2019	https://www.gov.uk/government/publications/clean-air-strategy-2019
Clean Growth Strategy	2017	https://www.gov.uk/government/publications/clean-growth-strategy
The 25 Year Environment Plan	2018	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf
Decarbonising Transport: Setting the Challenge	2020	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf
UK (second) National Adaptation Programme 2018 to 2023	2018	https://www.gov.uk/government/publications/climate-change-second-national-adaptation-programme-2018-to-2023
Local Energy East Strategy	2019	https://www.energyhub.org.uk/wp-content/uploads/2019/09/LEE-Energy-Strategy.pdf
Tomorrow's Norfolk, Today's Challenge: A Climate Change Strategy for Norfolk	(no date)	https://www.norwich.gov.uk/download/download/id/1094/norfolkclimatechangestrategy.pdf
Suffolk Climate Emergency Plan	2020	http://www.greensuffolk.org/assets/Greenest-County/SCCP/SCCP/Misc/2020-06-01-REE-SCEP-Technical-Report-FINAL.pdf
Regulation 19 'Pre-Submission' Draft GNLP	2021	https://www.gnlp.org.uk/
Regulation 19 'Pre-Submission' draft Babergh and Mid Suffolk Joint Local Plan	2020	https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-r19-pre-submission/
South Norfolk Environmental Strategy	2020	https://www.south-norfolk.gov.uk/sites/default/files/Environmental%20Strategy%20SNC_0.pdf

The key messages emerging from the review are summarised below:

- The DDNP will be required to be in general conformity with the NPPF, which requires proactive planning to both mitigate and adapt to climate change. Planning policies are expected to improve the resilience of communities and infrastructure to climate change impacts, avoid inappropriate development in the flood plain, and support the move to a low carbon economy. The NPPF recognises the potential for planning to shape places in ways that contribute to radical reductions in greenhouse gas emissions, and deliver long-term resilience; including through reuse, regeneration and conversion.
- The Clean Growth Strategy, Clean Air Strategy and the 25-year Environment Plan are a suite of documents which seek to progress the government's commitment under the UK Climate Change Act to becoming net zero by 2050. The documents set out detailed proposals on how the government will tackle all sources of air pollution, whilst maintaining an affordable energy supply and increasing economic growth. This parallels

with the 25-year Environment Plan, which further seeks to manage land resources sustainably, recover and reinstate nature, protect soils and habitats, increase resource efficiency, improve water quality, and connect people with the environment. The documents also interlink with the government's commitment to decarbonising transport, a recognised challenge that needs more work in a timely manner if government are to achieve net zero targets. Furthermore, the decarbonisation plan recognises the twinned need to undertake action to adapt the transport sector and increase resilience to climate change risks; and this challenge is more directly addressed through the UK's National Adaptation Programme.

- The Local Energy East Strategy recognises the East region as one of the most important energy producing areas in the UK and a leading area for renewable energy. Collective actions are identified which seek to; grow the local energy sector, support the delivery of new smart grid systems which underpin housing and commercial development, increase energy efficiency, improve energy affordability and reduce fuel poverty, and support the transition to electric vehicles.
- The county climate change strategies provide information in relation to key impact sectors, indicative emissions reduction pathways, and those areas most likely to benefit from targeted future action. Within Suffolk, policy options and actions are highlighted which will help the Council achieve carbon neutrality by 2030.
- The DDNP will also be required to be in general conformity with the Local Plans covering the area which contain policies relating to climate change mitigation and adaptation, including flood risk, green infrastructure development, resource efficiency, air quality, water quality, sustainable transport and accessibility.
- Additionally, the South Norfolk Environmental Strategy sets more localised key targets to reduce per capita emissions against 2017 levels, implement carbon offsetting measures (including solar generation and tree planting), and engage with local residents and businesses to support energy generation and carbon sequestration measures.

Baseline review

In 2019, both Suffolk County Council and Mid Suffolk District Council declared a **climate emergency**, committing to be carbon neutral by 2030. The Suffolk Climate Emergency Plan²⁵ commits all councils in Suffolk to reducing their own carbon emissions and working with partners across the county and region towards becoming carbon neutral. The Suffolk Climate Change Partnership (SCCP) also continues county-wide climate change project work by all councils which has been ongoing since 2007.

Whilst South Norfolk Council have recently published an Environmental Strategy, which seeks to progress action in terms of climate change, no climate emergency has yet been declared across Norfolk, and the Councils have not yet committed to a target date to become carbon neutral by.

²⁵ Ricardo (2020) Suffolk Climate Emergency Plan, Technical Report [online] available at: <http://www.greensuffolk.org/assets/Greenest-County/SCCP/SCCP/Misc/2020-06-01-REE-SCEP-Technical-Report-FINAL.pdf>

Climate change mitigation

CO₂ emissions by sector are shown in **Figures AB.2 and AB.3** for both South Norfolk and Mid Suffolk.²⁶

Figure AB.2: CO₂ emissions by sector in South Norfolk

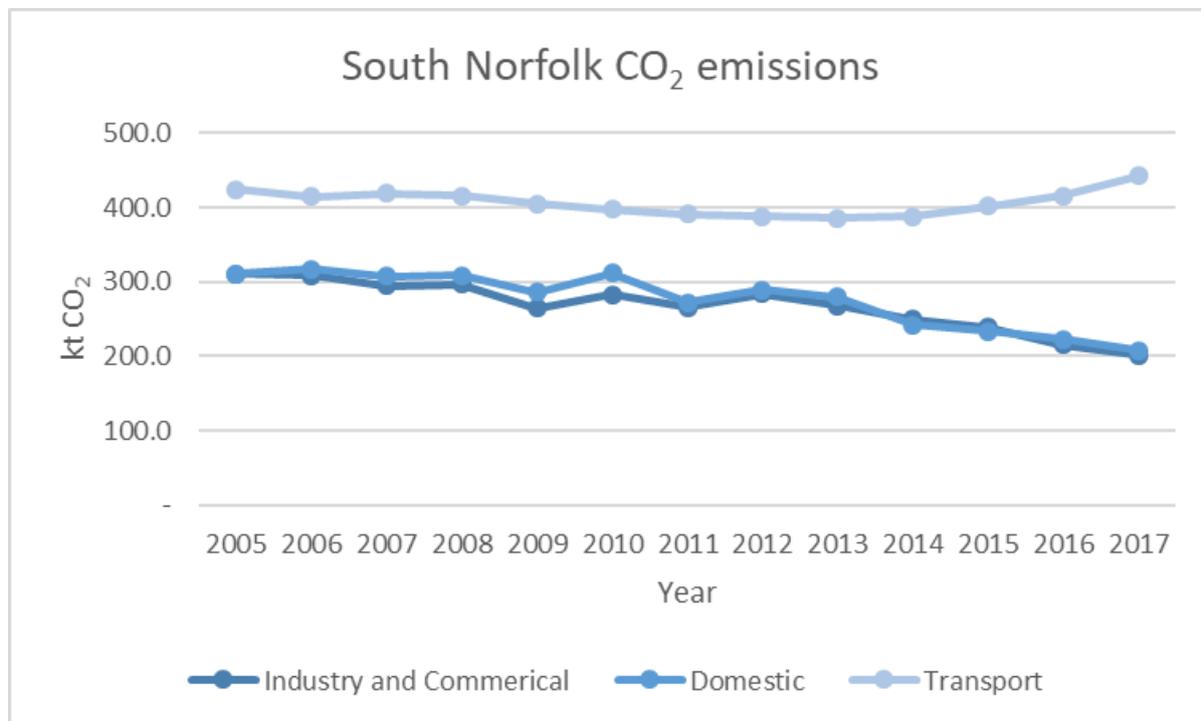
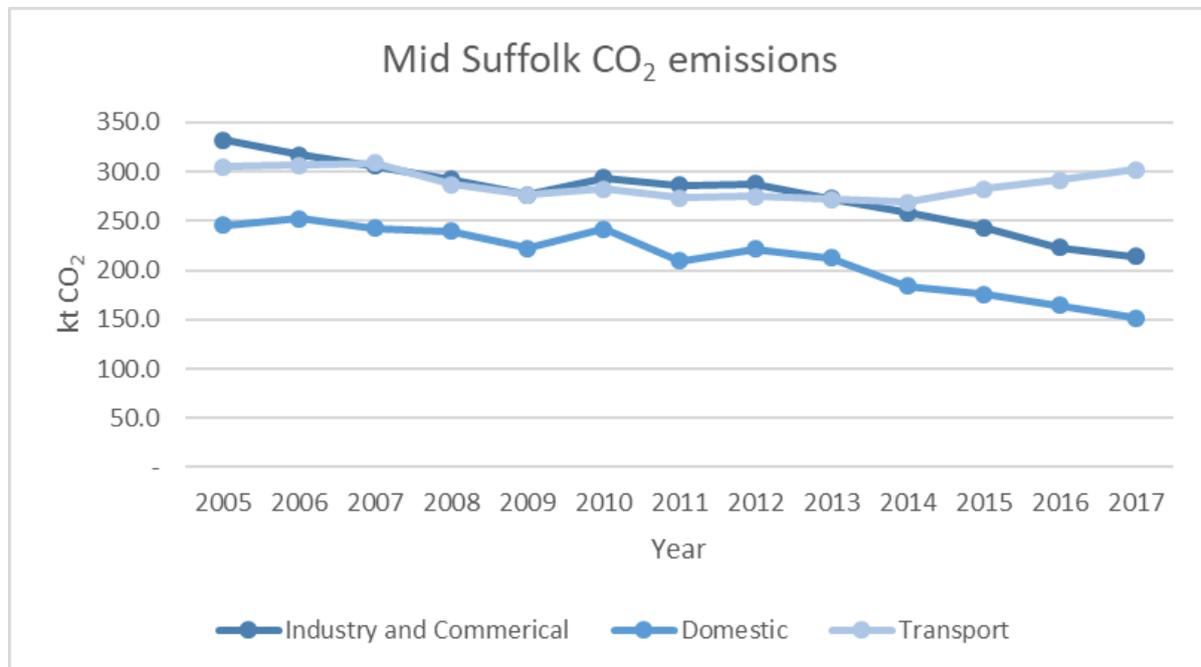


Figure AB.3: CO₂ emissions by sector in Mid Suffolk



In both areas, the transport sector continues to be the biggest contributing sector. Within this sector, the main sources in both district areas are emissions from A-roads, followed by emissions from minor roads. These emissions have not

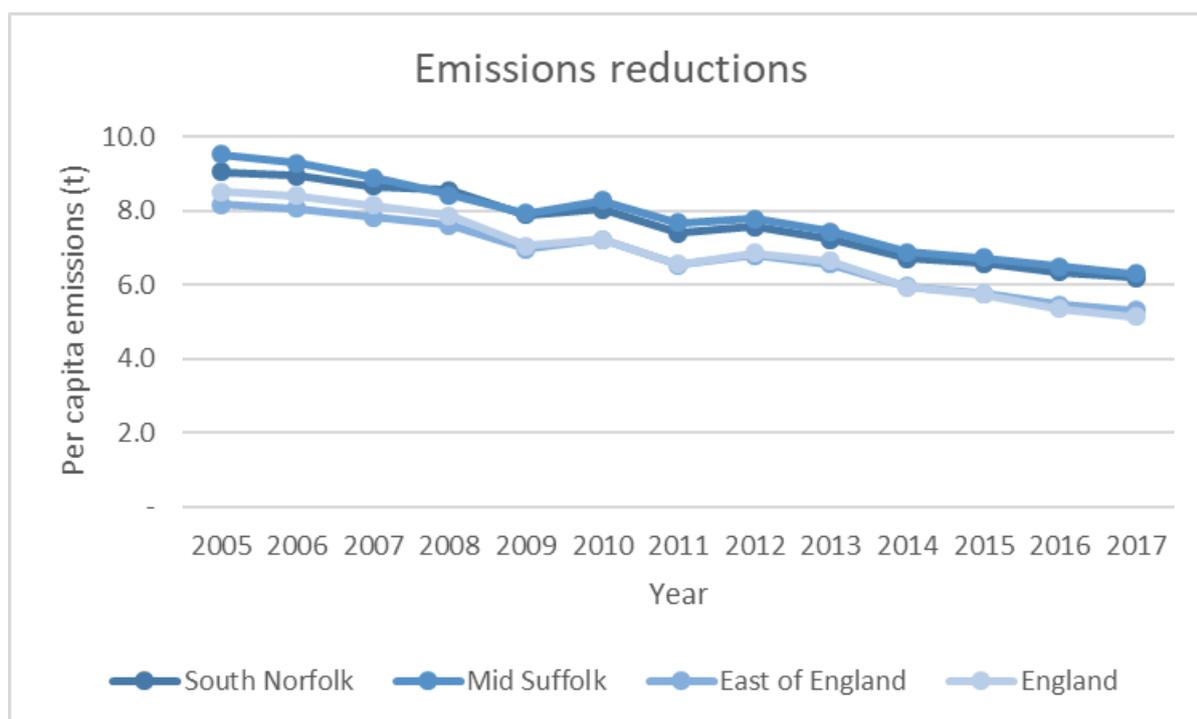
²⁶ DBEIS (2019) 2005 to 2017 UK local and regional CO₂ emissions – data tables [online] available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2017>

significantly changed since 2005, with a minor overall increase experienced in South Norfolk.

In the domestic sector, electricity use has historically been the biggest contributing source; however, in recent years in South Norfolk, emissions from electricity have broadly aligned with emissions from gas.

Figure AB.4 depicts emissions reductions since 2005 and in both District areas per capita emissions are slightly higher than the average for the East of England and England. However, the general downward trend largely matches that experienced at the national level.²⁷

Figure AB.4: Per capita emissions reductions since 2005



With regards to transport emissions, the uptake of Ultra Low Emission Vehicles (ULEVs) will contribute positively towards the reduction of road transport related emissions. In line with assumptions made by the Department for Transport's 'Road to Zero' Report (2018)²⁸, it is assumed that ULEV uptake will increase rapidly in the coming decade and aside from Heavy Goods Vehicles (HGVs), all vehicles could be ultra-low emission (powered either by hydrogen or electricity) by 2030.

Electric Vehicles (EVs) do not burn fuel and create almost no noise. They are battery powered and have the potential to be 'zero-emission vehicles' (ZEVs) if powered by renewable electricity. As of April 2020, there were 23 public electric charging devices in South Norfolk, four of which are rapid charging, equating to 2.9 rapid devices per 100,000 population. In Mid Suffolk, there were a total of nine public charging devices, one of which is rapid charging, equating to 1 rapid device

²⁷ Ibid.

²⁸ HM Gov (2018) The Road to Zero – Next steps towards cleaner road transport and delivering our Industrial Strategy [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf

per 100,000 population.²⁹ Within the Plan area, electric charging points exist at Weavers Court in Diss (fast), and SF Connect in Scole (rapid).³⁰

In terms of **renewable energy**, the Department for Business, Energy and Industrial Strategy publishes annual statistics on renewable energy generation, disaggregated by Local Authority.³¹ The most recent data (2019) shows that South Norfolk has a total of 4,776 renewable energy (electricity) installations and Mid Suffolk has 3,562. Most of these installations are photovoltaics, followed by onshore wind. The installations amount to a total renewable electricity capacity of 79.6MW in South Norfolk and 91.9MW in Mid Suffolk.

Climate change adaptation

Research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18) team. UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and level of confidence in each prediction.

As highlighted by the research, the effects of climate change for the East of England by 2050 in a 'medium emissions' scenario are likely to be as follows:

- An increase in winter mean temperature of 2.2°C and an increase in summer mean temperature of 2.8°C; and
- A change in winter mean precipitation greater than +10% and summer mean precipitation greater than -10%.

Resulting from these changes, a range of risks exist for the Plan area, including:

- Effects on water resources, such as a reduction in availability of groundwater for extraction and a need to increase capacity of wastewater treatment plants and sewers;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding and a need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution and spread of species at the northern edge of their distribution;
- Increased demand for air-conditioning; and
- Heat stress related issues with infrastructure due to increased temperature.

Flood risk

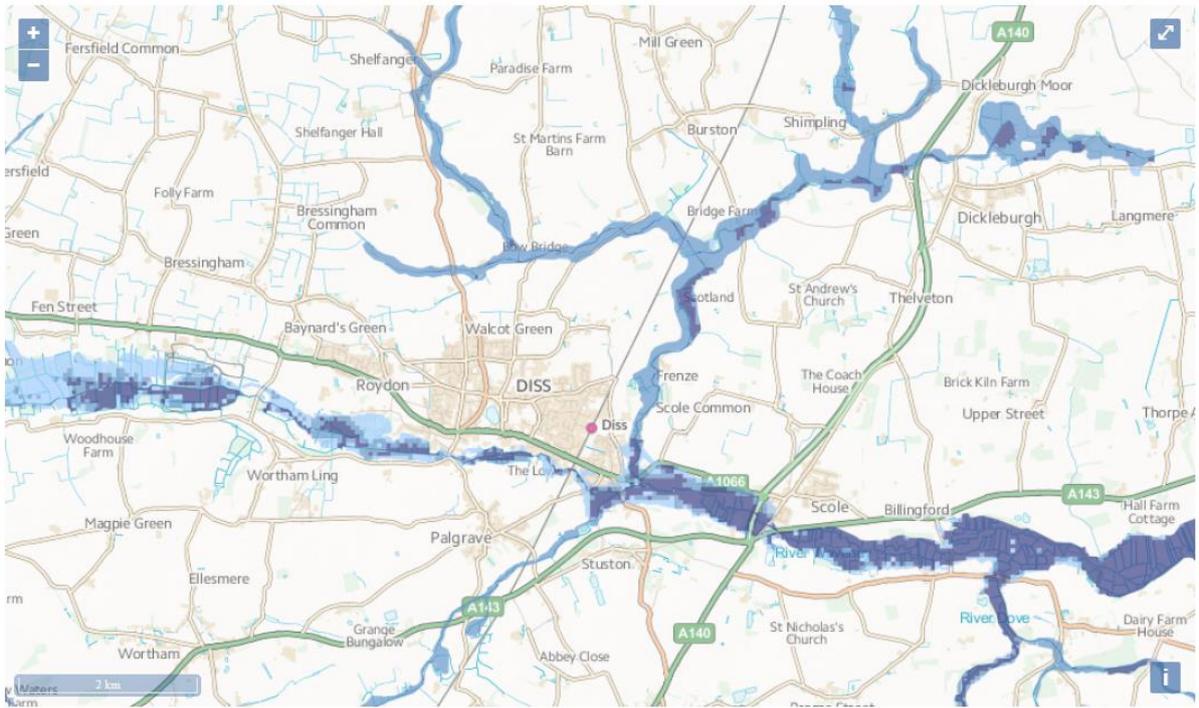
Fluvial flood risk in the Plan area follows the River Waveney and its tributaries, as depicted in **Figure AB.5** below. Surface water flood risk follows a similar course but extends further across the Plan area, as shown in **Figure AB.6**.

²⁹ Department for Transport (2020) Electric vehicle charging device statistics: April 2020 [online] available at: <https://www.gov.uk/government/statistics/electric-vehicle-charging-device-statistics-april-2020>

³⁰ Zap Map (2021) [online] available at: <https://www.zap-map.com/live/>

³¹ DBEIS (2020) Regional Renewable Statistics – Renewable electricity by local authority 2014 to 2019 [online] available at: <https://www.gov.uk/government/statistics/regional-renewable-statistics>

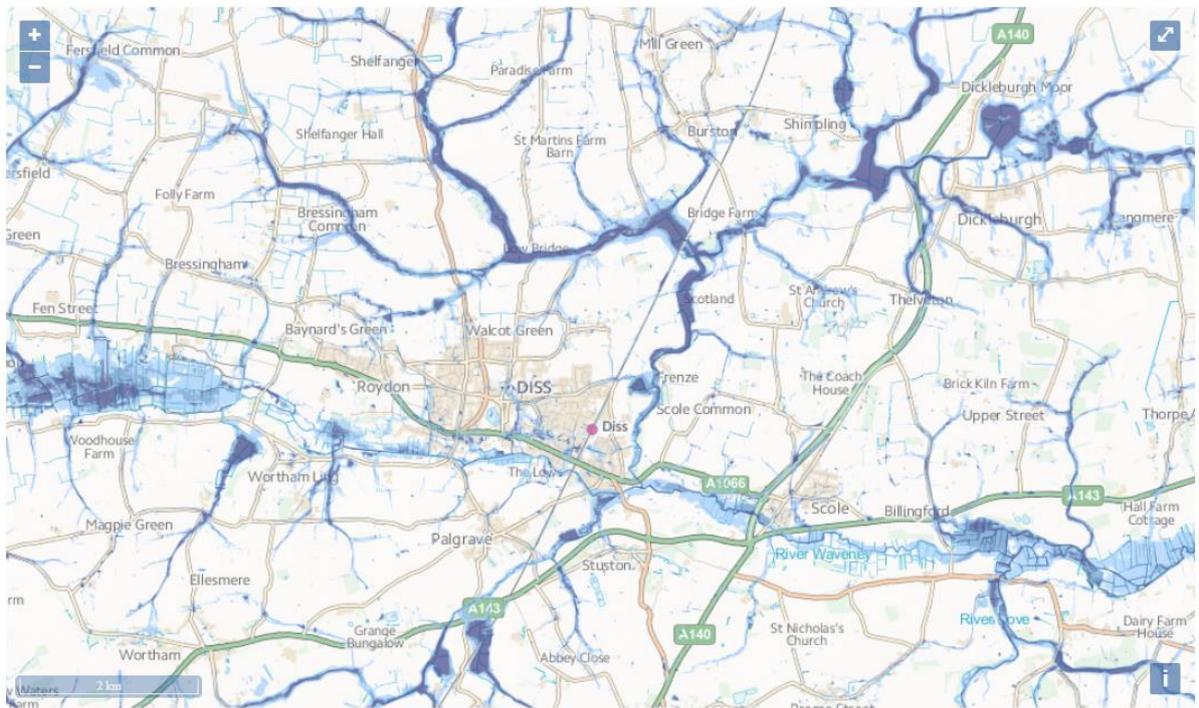
Figure AB.5: Fluvial flood risk



Extent of flooding from rivers or the sea

● High ● Medium ● Low ● Very low ⊕ Location you selected

Figure AB.6: Surface water flood risk



Extent of flooding from surface water

● High ● Medium ● Low ○ Very low ⊕ Location you selected

Future baseline

In line with UK trends and national commitments, emissions are likely to continue to fall as energy efficiency measures, renewable energy take-up and new technologies, such as EVs and solar PV, become more widely adopted. Notably, the Government has consulted on changes to England's Building Regulations introducing a 'Future Homes Standard' and the Department for Transport recently published 'Decarbonising Transport; setting the challenge' a first step towards publishing a full transport decarbonisation plan.

In the future, new development could have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk. It is further recognised that climate change has the potential to increase the occurrence of extreme weather events. This has the potential to put residents, property and development at a high risk of flood exposure. However, in line with the NPPF (2019) sequential testing is likely to ensure that development within areas at highest risk of flooding is largely avoided, and development is likely to deliver mitigation such as Sustainable Drainage Systems (SuDS).

Landscape

Policy context

Table AB.4 presents the most relevant documents identified in the policy review for the purposes of the DDNP SEA.

Table AB.4: Plans, policies and strategies reviewed in relation to landscape

Document Title	Year of publication	Weblink
National Planning Policy Framework (NPPF)	2019	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf
The 25 Year Environment Plan	2018	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf
The National Design Guide	2019	https://www.gov.uk/government/publications/national-design-guide
Regulation 19 'Pre-Submission' Draft GNLP	2021	https://www.gnlp.org.uk/
Regulation 19 'Pre-Submission' draft Babergh and Mid Suffolk Joint Local Plan	2020	https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-r19-pre-submission/

The key messages emerging from the review are summarised below:

- The DDNP will be required to be in general conformity with the NPPF which gives great weight to conserving and enhancing protected landscapes, as well as landscape character and scenic beauty. The NPPF recognises the role of green infrastructure in landscape settings, as well as the importance of designated biodiversity sites, habitats, woodland, historic features, agricultural land and cultural landscapes. The positive contribution that

land remediation can make in terms of addressing despoiled, degraded, derelict, contaminated and unstable land is also recognised.

- The 25-year Environment Plan and National Design Guide complement each other with their aims for a cleaner, greener country which puts the environment first and celebrates the variety of natural landscapes and habitats. Design is focused on beautiful, enduring and successful places, which respond to local character and provide a network of high quality green open spaces.
- The DDNP will also be required to be in general conformity with the Local Plans covering the DDNP area, which contains policies specifically relating to valued landscapes, landscape character, settlement identity, green infrastructure and design.

Baseline review

The landscape of the Plan area is not nationally designated. The entire area lies within the **South Norfolk and High Suffolk Claylands National Character Area**.³² The high and predominantly flat clay plateau dominates the character of the NCA, which is incised by numerous small-scale wooded river valleys.

The landscape holds both confined/ enclosed areas with intimate views and open areas with a sense of exposure. The underlying geology is chalk, which forms a principal aquifer, and the rivers are mostly small and slow flowing which contributes to the character of the landscape. The Waveney is the largest river in this area and forms a physical division between the counties of Norfolk and Suffolk. The river valleys contain an important mosaic of small-scale pasture, wet heath, reedbeds and woodland that provide ecological connectivity into the heart of the claylands. Woodland generally forms narrow bands on the edges of the plateau and views are frequently open, only sometimes confined by hedges, hedgerow trees and scattered smaller woodlands.

Much of the land area supports arable crops, with a historic link to farming and a strong utilitarian and rural character demonstrated through ancient irregular field patterns that are still discernible over much of the area. It is a long-settled landscape, with mixed settlement patterns; including nucleated villages, dispersed hamlets and moated farmsteads. Large, often interconnected village greens or commons are also a key feature of the landscape, along with long distance footpaths, country estates and parklands.

The main pressures for the NCA are change posed by the need to accommodate development in and around traditional centres and main transport routes.

The ecosystem services provided by the landscape, and which should be protected include; food provision, water availability, genetic diversity, regulating water quality, sense of place/ inspiration, sense of history, tranquillity and recreation. Of note for the DDNP, identified opportunities include;

- measures to conserve and enhance the characteristic historic settlement patterns (including notable village commons and greens) and historic features (including moated farmsteads);

³² Natural England (2014) NCA Profile: 83 South Norfolk and High Suffolk Claylands (NE544) [online] available at: <http://publications.naturalengland.org.uk/publication/6106120561098752?category=587130>

- measures to protect and enhance/ extend the area's woodlands, copses, river valley plantations, hedgerows, hedgerow trees and ecological connectivity; and
- improved opportunities for people to access, enjoy and understand rural and historic landscape assets, including recreational areas and tranquil areas

The area south of the Waverley is designated as a Special Landscape Area in the saved policies of the 1998 Mid Suffolk Local Plan.

The **Norfolk Green Infrastructure Mapping Report**³³ identifies that the DDNP area falls broadly within a 'wetland core area' and a 'woodland core area', with key connections to Norfolk Trails and Strategic Green Infrastructure (GI) Corridors. The trails and GI corridors largely follow the River Waveney, and extend north through the Plan area to connect with Norwich as well as north and east to connect with designated coastal landscapes (The Broads National Park, Norfolk Coast Area of Outstanding Natural Beauty (AONB), and Suffolk Coast and Heaths AONB).

At a more local level, the **South Norfolk Landscape Character Assessment**³⁴ identifies that the northern extent of the DDNP area is characterised by two landscape types; the 'Waveney Rural River Valley' and 'Waveney Tributary Farmland'. The landscape types highlight the key landscape connections to the river corridor. The key characteristics of the Rural River Valley type are summarised as:

- Distinct valley landform;
- Semi-enclosed landscape;
- Perceived presence of a river that is often not actually visible within the landscape;
- Willow pollards and lines of poplar;
- Attractive river crossings;
- Areas of pastoral floodplain;
- Historic quality to areas within the valley landscape;
- Settlements predominantly small and nucleated of strong vernacular character with scattered farmsteads;
- Characteristic vernacular architecture; and
- Presence of characteristic ecological assemblages.

The key characteristics of the Tributary Farmland type as summarised as:

- Shelving and gently undulating landform;
- Transitional landscape;
- Tamed and peaceful farmland;
- Dispersed but evenly distributed settlement pattern;

³³ Norfolk Biodiversity Partnership (2017) Green Infrastructure Mapping Report [online] available at: <http://www.norfolkbiobiodiversity.org/publications/>

³⁴ LUC (2001) South Norfolk Landscape Character Assessment (including the Chris Blandford Associates 2012 Review) [online] available at: <https://www.south-norfolk.gov.uk/residents/planning-and-building/planning-policy/landscape-character-assessments>

- An intricate network of narrow, winding rural lanes;
- Elusive tributaries;
- Medium to large-scale arable farmland;
- Remnant parkland;
- Mixed architectural character; and
- High proportion of important ecological assemblages.

The **Suffolk Landscape Character Assessment**³⁵ characterises the south of the DDNP area more distinctly with four landscape character types. The key characteristics for each of these landscape types are identified in **Table AB.5** below.

Table AB.5: Suffolk County Landscape Character Types in the DDNP area

Suffolk Landscape Character Type	Key characteristics
Wooded valley meadowlands and fens	<ul style="list-style-type: none"> • Flat valley bottom • Extensive peat deposits • Cattle grazed pasture • Network of drainage ditches • Areas of unenclosed “wild” fenland • Widespread plantation and carr woodland • Important sites for nature conservation • Localised settlement on the valley floor “islands” • Sense of quiet and rural isolation in many places
Rolling valley farmlands and furze	<ul style="list-style-type: none"> • Valleys with prominent river terraces of sandy soil • Small areas of gorse heathland in a clayland setting • Straight boundaries associated with late enclosure • Co-axial field systems • Mixed hedgerow of hawthorn, dogwood and blackthorn with oak, ash and field maple • Fragmentary cover of woodland • Sand and gravel extraction • Golf courses • Focus for larger settlements
Rolling valley claylands	<ul style="list-style-type: none"> • Gently sloping valleys on medium clay soils • Occasional notable steeper slopes • Fields often smaller than on surrounding plateau • Localised influence of landscape parks • Focus of settlement • Few large greens or commons • Ancient woodland on the upper fringes of the valley sides
Ancient plateau claylands	<ul style="list-style-type: none"> • Flat or gently rolling arable landscape of clay soils dissected by small river valleys • Field pattern of ancient enclosure – random patterns in the south but often co-axial in the north. Small patches of straight-edged fields associated with the late enclosure of woods and greens

³⁵ Suffolk County Council (2021) Suffolk Landscape Character Assessment [online] available at: <https://suffolklandscape.org.uk/>

Suffolk Landscape Character Type **Key characteristics**

- Dispersed settlement pattern of loosely clustered villages, hamlets, and isolated farmsteads of medieval origin
- Villages often associated with medieval greens or tyes
- Farmstead buildings are predominantly timber-framed, the houses colour-washed and the barns blackened with tar. Roofs are frequently tiled, though thatched houses can be locally significant
- Scattered ancient woodland parcels containing a mix of oak, lime, cherry, hazel, hornbeam, ash and holly
- Hedges of hawthorn and elm with oak, ash and field maple as hedgerow trees
- Substantial open areas created for WWII airfields and by 20th century agricultural changes
- Network of winding lanes and paths often associated with hedges create visual intimacy

Future baseline

New development, including infrastructure development, has the potential to lead to incremental changes in landscape quality within and surrounding the DDNP area. This could place increased pressures on the surrounding countryside and local settings. Development could also lead to the physical loss of landscape features (such as trees) and has the potential to disrupt key views.

Coordinated delivery of green infrastructure, new recreational opportunities and any regeneration opportunities could support landscape enhancements. The DDNP provides the opportunity to spatial plan for further development, in a way which minimises landscape impacts and seeks ultimately to enhance the landscape or settlement setting.

Historic environment

Policy context

Table AB.6 presents the most relevant documents identified in the policy review for the purposes of the DDNP SEA.

Table AB.6: Plans, policies and strategies reviewed in relation to the historic environment

Document Title	Year of publication	Weblink
National Planning Policy Framework (NPPF)	2019	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf
The 25 Year Environment Plan	2018	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf
The National Design Guide	2019	https://www.gov.uk/government/publications/national-design-guide
Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management	2019	https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/

Document Title	Year of publication	Weblink
Historic England Advice Note 3: The Setting of Heritage Assets	2017	https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/
Historic England Advice Note 8: Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)	2016	https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/
Historic England Advice Note 11: Neighbourhood Planning and the Historic Environment	2018	https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/
Regulation 19 'Pre-Submission' Draft GNLP	2021	https://www.gnlp.org.uk/
Regulation 19 'Pre-Submission' draft Babergh and Mid Suffolk Joint Local Plan	2020	https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-r19-pre-submission/

The key messages emerging from the review are summarised below:

- The key high-level principles for the conservation and enhancement of the historic environment are as follows:
 - The historic environment is a shared resource
 - Everyone should be able to participate in sustaining the historic environment
 - Understanding the significance of places is vital
 - Significant places should be managed to sustain their values
 - Decisions about change must be reasonable, transparent and consistent
 - Documenting and learning from decisions is essential.³⁶
- The significance of places is the key element which underpins the conservation and enhancement of the historic environment. Significance is a collective term for the sum of all the heritage values attached to a place, be it a building an archaeological site or a larger historic area such as a whole village or landscape
- The DDNP will be required to be in general conformity with the NPPF, which ultimately seeks to conserve and enhance historic environment assets in a manner appropriate to their significance. The NPPF seeks planning policies and decisions which are sympathetic to local character and history without preventing or discouraging appropriate innovation of change. Planning Practice Guidance expands on the NPPF recognising the proactive rather than passive nature of conservation.
- The role of the historic environment, as part of healthy and thriving ecosystems, landscapes and cultural values, including settlement identity, is reiterated through the key messages of the 25 Year Environment Plan and National Design Guide.

³⁶ Historic England: Conservation Principles, Policies and Guidance

- Historic England’s Advice Notes provide further guidance in relation to the conservation and enhancement of the historic environment. Of particular relevance for the DDNP is the emphasis on the importance of:
 - Understanding the different types of special architectural and historic interest which underpin designations, as well as how settings and/ or views contribute to the significance of heritage assets;
 - Recognising the value of implementing controls through neighbourhood plans, conservation area appraisals and management plans; and
 - Appropriate evidence gathering, including clearly identifying those issues that threaten an area or assets character or appearance and that merit the introduction of management measures.
- The DDNP will also be required to be in general conformity with the Local Plans covering the DDNP area which contain policies directly relating to the historic environment.
- In addition to conserving the historic environment, the DDNP should seek to identify opportunities to enhance the fabric and setting of the historic environment. It should also seek to rejuvenate features and areas which are at risk of neglect and decay.

Baseline review

The DDNP holds rich historic values, some of which, such as historic landscape values, have already been demonstrated in other scoping themes.

Designated heritage assets

In terms of nationally designated assets, the assets across the parishes are identified in **Table AB.7** below and located in **Figure AB.7** at the end of the baseline summary.

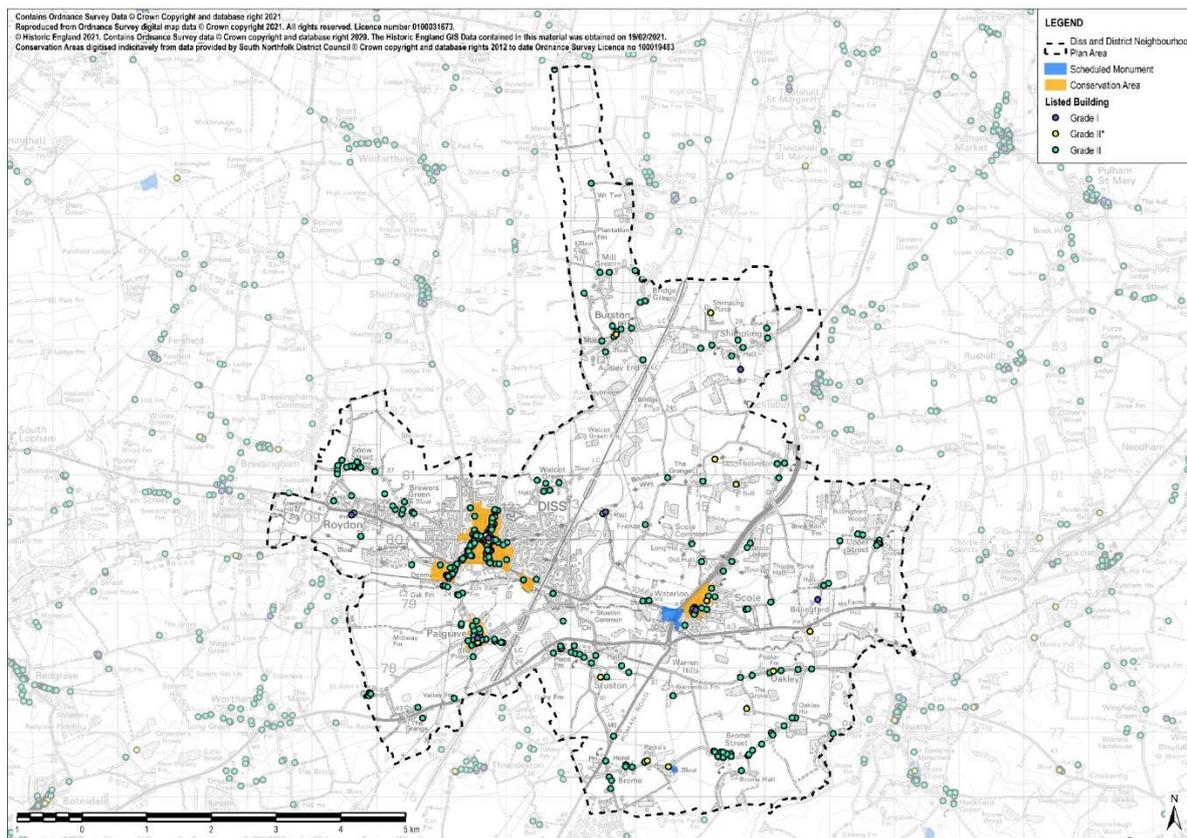
Table AB.7: Designated heritage assets³⁷

Parish	No. of designated assets
Diss	191 records: <ul style="list-style-type: none"> • Grade I; 3 • Grade II*; 3 • Grade II; 184 • Park & Garden Grade II; 1
Roydon	31 records: <ul style="list-style-type: none"> • Grade I; 1 • Grade II; 30
Scale	57 records: <ul style="list-style-type: none"> • Grade I; 4 • Grade II*; 4 • Grade II; 48 • Scheduled monument; 1
Burston and Shimpling	26 records: <ul style="list-style-type: none"> • Grade I; 1

³⁷ Historic England (2021) The National Heritage List for England [online] available at: <https://historicengland.org.uk/listing/the-list/>

Parish	No. of designated assets
	<ul style="list-style-type: none"> Grade II*; 2 Grade II; 23
Palgrave	44 records: <ul style="list-style-type: none"> Grade I; 1 Grade II*; 1 Grade II; 42
Stuston	18 records: <ul style="list-style-type: none"> Grade II*; 1 Grade II; 16 Scheduled monument; 1
Brome and Oakley	41 records: <ul style="list-style-type: none"> Grade II*; 4 Grade II; 36 Scheduled monument; 1

Figure AB.7: Designated heritage assets



The **Heritage at Risk Register**³⁸ identifies designated assets which are at most risk of being lost as a result of neglect, decay or inappropriate development. In the DDNP area, assets identified as 'at risk' include the Church of All Saints, Church Lane in Stuston and Poplar Farmhouse at Brome and Oakley.

Four of the seven parishes contain designated conservation areas, each of which are discussed in turn below.

Diss Conservation Area³⁹

In the Domesday Book, Diss is noted as a royal manor, and by the end of the 12th century, its commercial importance was firmly established. The market dates from 1135 and a charter for the great annual fair was granted in 1195. Historically, Diss has benefitted from a location with good communications in all directions and a good supply of water.

The Middle Ages saw the rise of the wool and linen trades and merchants used their wealth to build fine houses, warehouses and guild halls, and to build and add to the parish church. This prosperity was consolidated in the 16th and 17th centuries and a large proportion of the buildings in the centre of Diss survive from this period.

Whilst the wool and weaving industries later declined, Diss remained as a significant local market town, with additional fine Georgian houses and smaller cottages added in later periods. The town was noted for brewers and other associated professionals who lived close to their workplaces, and many of their buildings survive.

The arrival of the railway in the 19th century led to the growth of various industries and housing along Victoria Road, and helped the town to prosper without physically affecting the centre.

In more recent times, the population of Diss has increased substantially, though the River Waveney continues to provide a natural boundary, with most growth occurring to the north, east and west of the town, including into the neighbouring parish of Roydon.

The town rises from the flood plain of the river, and the rising ground has created some important viewpoints and townscapes within the streets and across to the Mere and park. The trees along Park Road are a significant element in the views from the north, while the church tower still dominates the view from the south.

The Diss Conservation Area can be characterised into three main areas; the central core, the Mere and the area outside the core. The Market Place, the church, Market Hill, St Nicholas Street and a network of alleys, passages and yards comprise what is thought to be the original core of the town and has been described as the Diss Heritage Triangle. The Mere has helped to determine the shape of the town and provides a venue for recreational activities. The panoramic view from the park, over the Mere to the church tower beyond is unparalleled in the district, but from the main streets, the Mere is rarely visible except from occasional glimpses. In the area outside of the core a number of Streets are noted for historic values, including; Mere Street, and Mount Street (including the park), and to a lesser extent Upper Denmark Street, Church Street, Chapel Street and Fair Green.

³⁸ Historic England (2021) Heritage at Risk Register [online] available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/>

³⁹ South Norfolk Council (2012) Diss Conservation Area Character Appraisal and Management Plan [online] available at: https://www.south-norfolk.gov.uk/sites/default/files/Diss_Character_Appraisal_2012_1.pdf

Trees and open spaces are also identified as of value to the heritage setting. The main open spaces include; The Mere and Park fields, Fair Green, The Cedars and The Lawn (Parish Fields), Rectory playing fields and meadows, and St Marys Churchyard. Smaller spaces that are also known to contribute to character include; the plains and yards along Market Hill, The Market Place, Mere's Mouth, North of Navire House, The yards off St Nicholas Street, and Madgett's Walk.

Scole Conservation Area⁴⁰

While the parish of Scole comprises five historic settlements (Frenze, Thorpe Parva, Billingford, Thelveton and Scole), Scole provides the location of the conservation area. The parish of Scole was known as "Osmundeston" (Osmund's Settlement) and is recorded as such in the Domesday Book. The name Scole does not appear until 1191. The historic core of the village developed on the main Norwich to Ipswich Road where it meets the road from Bury to Harleston. Here the Scole Inn still dominates the centre with the Church of St Andrew to the north set above the street, with the bypass easing the pressure on this ancient crossroads.

The key characteristics of the Scole Conservation Area are summarised as:

- Concentration of built form at historic crossroads dominated by the Scole Inn;
- Important C14 church (despite damage in the 1960s) on raised platform;
- Key contribution of trees and open spaces/ recreation areas to the south; and
- Modern expansion and development to the east and south.

There is evidence of Roman occupation in Scole and a small town developed where the major Roman Road from London crossed the River Waveney. Excavations in advance of the construction of the bypass revealed the remains of buildings, wells, industrial activities and burials. Coins were also found when a wall was built opposite the Scole Inn.

Today, much of the character to the south is dominated by the landscape of the Waveney Valley with the A143 providing a platform from where extensive views can be enjoyed both to the north and south including, at one point, a good view of Scole Inn. Notable roads include; Low Road, Norwich Road and Diss Road. Furthermore, trees and hedges are also considered to play an important visual role.

Burston Conservation Area⁴¹

Burston has developed mainly along Diss Road, Crown Green and Station Road and is centred around two village greens. The western half of the settlement comprises relatively modern detached dwellings in contrast to the eastern side which is mainly semi-detached ribbon development. Crown Green, Church Green and the open areas leading into Higdon Close form an attractive centre to Burston. The Conservation Area extends along Diss Road and Mill Road, encompassing several notable old buildings. A draft Conservation Area Appraisal has recently been made available.

⁴⁰ South Norfolk Council (2017) Scole Draft Conservation Area Character Appraisal and Management Guidelines [online] available at: https://www.south-norfolk.gov.uk/sites/default/files/Scole_Character%20Appraisal.pdf

⁴¹ South Norfolk Council (2015) Burston (Rural Area) [online] available at: https://www.south-norfolk.gov.uk/sites/default/files/Burston_settlement.pdf

Palgrave Conservation Area⁴²

Palgrave sits on a spur of slightly higher ground between the southern bank of the River Waveney and a tributary joining the river from a south-westerly direction.

Archaeological sites exist from all periods in the Parish and significant finds include Neolithic flint axes, Iron Age pottery, and Roman potsherds (broken ceramics), bone and coins. Medieval sites include the parish churchyard and the site of the former St. John's Chapel. There is also some Post Medieval interest represented by the sites of a windmill and two bridges over the Waveney. Around half of the designated assets in the parish lie within the Palgrave Conservation Area which includes the Grade I listed Church of St Peter.

The Conservation Area is centred on the Village Green, and the most prominent trees in Palgrave are located here. Although often not visible, the area is valued for its short distance connections to the surrounding countryside.

Non-designated heritage assets

It is recognised that not all historic environment features are protected under statutory designation, and non-designated features comprise a large part of what people enjoy as part of the setting and character of areas. For example, open spaces and distinctive non-listed buildings are often of local value. **Historic Environment Records** (HERs) provide comprehensive records of non-designated features, including areas of known archaeological activity.

The Norfolk Heritage Explorer⁴³ provides access to the Norfolk HER and identifies 256 records within Diss, 76 records in Roydon, 180 records in Scole, and 71 records in Burston and Shimpling. These comprise monuments, buildings, and finds from all periods.

The Suffolk Heritage Explorer⁴⁴ provides access to the Suffolk HER and identifies 66 records within Palgrave, 61 records in Stuston and 81 records in Brome and Oakley. This includes monuments, find spots, farmsteads and buildings from a range of periods, including; Palaeolithic, Mesolithic, Neolithic, Bronze Age, Prehistoric, Roman, Medieval and Post Medieval.

Future baseline

Whilst designated assets, and non-designated assets will continue to be afforded protection under the provisions of the NPPF and Local Development Frameworks, it is recognised that future development has the potential to negatively affect historic character and settings, detract from historic settlement qualities and disrupt valued viewpoints; being susceptible to insensitive design and layout in new development.

Planning for future growth through the DDNP will support the minimisation of impacts. It can also seek opportunities for public realm improvements, and accessibility improvements which can indirectly benefit access to and enjoyment of the historic environment.

⁴² Mid Suffolk Council (2008) Palgrave Conservation Area Appraisal [online] available at: <https://www.babergh.gov.uk/assets/Conservation-Area-Appraisals/Palgrave2008CAA.pdf>

⁴³ Norfolk County Council (2021) Norfolk Heritage Explorer [online] available at: <http://www.heritage.norfolk.gov.uk/simple-search>

⁴⁴ Suffolk County Council (2021) Suffolk Heritage Explorer [online] available at: <https://heritage.suffolk.gov.uk/>

Land, soil and water resources

Policy context

Table AB.8 presents the most relevant documents identified in the policy review for the purposes of the DDNP SEA.

Table AB.8: Plans, policies and strategies reviewed in relation to land, soil and water resources

Document Title	Year of publication	Weblink
National Planning Policy Framework (NPPF)	2019	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf
The 25 Year Environment Plan	2018	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf
Safeguarding our Soils: A strategy for England	2009	https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england
Future Water: The government's water strategy for England	2011	https://www.gov.uk/government/publications/future-water-the-government-s-water-strategy-for-england
Water for Life	2011	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228861/8230.pdf
The National Waste Management Plan	2013	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf
Anglian Water's Water Resource Management Plan (WRMP)	2019	https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf
Norfolk Minerals and Waste Local Plan Review – Preferred Options Consultation Document	2019	https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning-policies/norfolk-minerals-and-waste-local-plan-review
Suffolk Minerals and Waste Local Plan (SMWLP)	2020	https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/
Regulation 19 'Pre-Submission' Draft GNLP	2021	https://www.gnlp.org.uk/
Regulation 19 'Pre-Submission' draft Babergh and Mid Suffolk Joint Local Plan	2020	https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-r19-pre-submission/
Babergh and Mid Suffolk Water Cycle Study	2020	https://www.midsuffolk.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/WCS2020/BMSDC-WCS-Report-Oct20.pdf
Greater Norwich Water Cycle Study	2021	https://www.gnlp.org.uk/sites/gnlp/files/2021-01/Greater%20Norwich%20Water%20Cycle%20Study_Final_draft_issued_2021-01-12.pdf

The key messages emerging from the review are summarised below:

- The DDNP will be required to be in general conformity with the NPPF, which seeks to protect high quality soil resources, and improve the water environment; recognising the wider benefits of natural capital and derived from ecosystem services. Furthermore, the NPPF recognises the need to take account of the long-term implications of climate change and build resilience in this respect. The NPPF encourages efficient land use, utilising brownfield land opportunities and land remediation schemes where appropriate and delivering environmental gains.
- The 25-year Environment Plan presents a focus for environmental improvement in the next couple decades, with aims to achieve clean air, clean and plentiful water, and reduced risk from environmental hazards. This includes measures to improve soil quality, restore and protect peatlands, use water more sustainably, reduce pollution, maximise resource efficiency and minimise environmental impacts. This leads on from and supports the soil strategy for England (Safeguarding our soils) which seeks to ensure that all England's soils will be managed sustainably and degradation threats tackled successfully by 2030, as well as the national water strategies which seek to secure sustainable and resilient water resources and improve the quality of waterbodies, and the national waste plan which seeks to identify measures being taken to move towards a zero waste economy.
- Anglian Water's WRMP further highlights the acute stresses that the catchment faces in the coming years and the challenges we face in terms of securing water resources into the future in one of the driest regions in England. The Plan outlines how Anglian Water aim to confront and manage these issues to ensure the timely provision of clean water to all residents in the period up to 2045.
- The DDNP will also be required to be in general conformity with the Norfolk and Suffolk Minerals and Waste Local Plans, which form part of the Local Development Frameworks for each county. These plans identify and safeguard sites and resources important to the continued sustainable management of mineral extractions and waste arisings.
- Furthermore, the DDNP will also be required to be in general conformity with the Local Plans covering the DDNP area, which contain policies specifically relating to efficient land use, the sustainable use of resources, soil protection, the efficient use of water, and protection for water quality.
- The district Water Cycle Studies provide further insight to the constraints associated with planned development in each area, in terms of water supply capacity, wastewater capacity and associated environmental capacity. This identifies the relevant water quality issues, water infrastructure upgrade requirements and further constraints to development across the Plan areas. The studies demonstrate those Water Recycling Centres (WRCs) which are likely to require infrastructure upgrades to accommodate future development, and this need is more acute in South Norfolk than in Mid Suffolk. Despite this, the DDNP area is not an area most affected by short-term supply issues.

Baseline review

Geology, minerals and waste

The bedrock geology of the DDNP area is Chalk formed during the Cretaceous Period. Superficial deposits in the immediate vicinity of the River Waveney include Alluvium (Clay, Silt and Sand) and Glacial Sand and Gravel. Moving further out from the River Waveney, superficial deposits are predominantly Till (Diamicton (unsorted to poorly sorted particles ranging in size from clay to boulders and suspended in a matrix of mud or sand)).⁴⁵

North of the River Waveney, the **Norfolk Minerals and Waste Local Plan Preferred Options Consultation Document**⁴⁶ does not propose any new minerals extraction sites within the DDNP area. There are also no safeguarded minerals, waste or waste-water areas within this part of the DDNP area.

South of the River Waveney, the **Suffolk Minerals and Waste Local Plan (SMWLP)**⁴⁷ does not propose any new minerals or waste sites within the Plan area. However, the whole area falls within a Minerals Consultation Area, and the Diss, Stowmarket and Norton Waste-Water Treatment Plants are safeguarded within the Plan area. Furthermore, an area of land just south of the Brome and Oakley border (outside of the DDNP area) between Yaxley and Brome is safeguarded for the Eye Power Station (Incinerators with Energy Recovery).

Soil resources

The **Agricultural Land Classification (ALC)** classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land (BMV) and Grades 3b to 5 are of poorer quality. In this regard, the DDNP area is predominantly underlain by Grade 3 land, with smaller areas of Grade 4.⁴⁸ However, the provisional dataset does not determine whether this is grade 3a or 3b, and thus it is uncertain whether the majority of land in the plan area is considered BMV.

The **'Predictive BMV Land Assessment'**⁴⁹ indicates that the northern extent of the DDNP area (north of the River Waveney) has a moderate likelihood of BMV land (20 – 60%), whereas the land in the south of the DDNP area (south of the River Waveney) has areas of both moderate and high likelihood (>60%). Areas of high likelihood are largely concentrated in Stuston and Brome and Oakley.

Water resources

The DDNP area is served by **Anglian Water Services (AWS)**. The Environment Agency have identified areas of relative water stress and the whole of AWS' supply area is shown as an area of 'Serious' water stress, based upon the amount of water available per person both now and in the future.⁵⁰

⁴⁵ British Geological Survey (2021) Geology of Britain viewer [online] available at: <https://www.bgs.ac.uk/map-viewers/geology-of-britain-viewer/>

⁴⁶ Norfolk County Council (2019) Norfolk Minerals and Waste Local Plan Review Preferred Options consultation document [online] available at: <https://norfolk.oc2.uk/document/49>

⁴⁷ Suffolk County Council (2020) Suffolk Minerals & Waste Local Plan (SMWLP) [online] available at: <https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/>

⁴⁸ DEFRA (2021) Magic Map application [online] available at <https://magic.defra.gov.uk/magicmap.aspx>

⁴⁹ Natural England (2017) Likelihood of Best and Most Versatile Agricultural Land [online] available at: <http://publications.naturalengland.org.uk/category/5208993007403008>

⁵⁰ Environment Agency (2013) Water stressed areas – final classification [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf

Anglian Water's Water Resource Management Plan (WRMP)⁵¹ identifies that the supply-demand balance is under significant pressure from population growth, climate change, sustainability reductions and the need to increase resilience to severe drought. These challenges are acute in the East of England region given low rainfall combined with a significant proportion of wetland sites of conservation interest. An additional 294 Ml/d is required by 2045; the equivalent of more than a quarter of the average daily distribution input in 2017-18. Furthermore, a significant proportion of these needs will be required by 2025. The Plan prioritises demand management, whilst also investing in supply, with particular focus on the period up to 2025. However, the Plan does not result in any significant changes or new infrastructure within or near the DDNP area.

Water quality

The main waterbody in the DDNP area is the **River Waveney** (upstream of the Frenze Beck, and Frenze Beck to Dove). Tributaries that also fall within the DDNP area include; **Frenze Beck**, **Dickleburgh Stream** and the **Tributary of Upper Waveney**. The **River Dove** also borders the Plan area in the east (east of Oakley).

The waterbodies fall within the Waveney Operational Catchment. The source of the river Waveney is in the Redgrave and Lopham Fen National Nature Reserve (NNR), from where it travels east through Diss and past Burgh Castle into Breydon Water, joining the River Yare to reach the sea at Great Yarmouth. The River Waveney also forms the boundary between the counties of Norfolk and Suffolk. Most waterbodies in this catchment are considered of 'moderate' ecological quality but fail in terms of their chemical status.

All of the waterbodies which fall within and adjacent to the DDNP area have consistently achieved a 'moderate' ecological status since 2013 and had good chemical status between 2013 and 2016. However, in 2019, they all failed in terms of their chemical status. Reasons for not achieving good status across the waterbodies include; drought, poor nutrient and soil management, private sewage treatment and sewage discharge, groundwater abstraction, arable land use, and transport drainage.

Furthermore, the whole DDNP area lies within a **Drinking Water (Surface Water) Safeguard Zone**.⁵² These are areas identified as at risk of failing national drinking water protection objectives. Whilst non-statutory designations, action is taken within these areas to address water contamination; with the aim of avoiding extra treatment by water companies.

Nitrate Vulnerable Zones (NVZs) denote areas at risk from agricultural nitrate pollution and much of the East of England, including the whole of the DDNP area, is identified as an NVZ.⁵³ NVZs identify rules in relation to the use of fertilisers and manures as well as a requirement to prevent water pollution from farm areas. Additional agricultural use/ development is not being proposed through the DDNP, and effects in relation to NVZs are therefore not considered likely.

⁵¹ Anglian Water (2019) Water Resources Management Plan 2019 [online] available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>

⁵² DEFRA (2021) Magic Map application [online] available at <https://magic.defra.gov.uk/magicmap.aspx>

⁵³ DEFRA (2021) Magic Map application [online] available at <https://magic.defra.gov.uk/magicmap.aspx>

Future baseline

Future development has significant potential to affect soil and mineral resources in the Plan area, including through the direct loss of (potentially) high quality agricultural land. The DDNP provides the opportunity to direct future growth away from areas of highest quality agricultural land, thereby minimising the likely impacts on soil resources.

Future development also has the potential to affect water quality through increased consumption, diffuse pollution, waste-water discharges, water run-off, and modification. It is considered that AWS will continue to address any water supply and wastewater management issues over the plan period, in line with the WRMP 2019 (which plans for the period up to 2045). Furthermore, the requirements of the Water Framework Directive, as transposed into national legislation, are likely to lead to continued improvements to water quality within the DDNP and wider area. However, it will be important for new development to avoid impacts on water quality, and support demand management measures by contributing to reduced consumption and improved efficiency.

Population and communities

Policy context

Table AB.9 presents the most relevant documents identified in the policy review for the purposes of the DDNP SEA.

Table AB.9: Plans, policies and strategies reviewed in relation to population and communities

Document Title	Year of publication	Weblink
National Planning Policy Framework (NPPF)	2019	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf
Regulation 19 'Pre-Submission' Draft GNLP	2021	https://www.gnlp.org.uk/
Regulation 19 'Pre-Submission' draft Babergh and Mid Suffolk Joint Local Plan	2020	https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-r19-pre-submission/
Greater Norwich Homeslessness Strategy 2015 - 2020	2015	https://www.south-norfolk.gov.uk/residents/housing/homelessness-advice/homelessness-strategy
Mid Suffolk Homes and Housing Strategy 2019 - 2024	2019	https://www.midsuffolk.gov.uk/housing/homes-strategy/
Mid Suffolk Homelessness Reduction and Rough Sleeper Strategy 2019 - 2024	2019	https://www.midsuffolk.gov.uk/housing/homes-strategy/
Babergh and Mid Suffolk Communities Strategy 2019 - 2036	2019	https://www.midsuffolk.gov.uk/communities/communities-strategy/

The key messages emerging from the review are summarised below:

- The DDNP will be required to be in general conformity with the NPPF, which on the whole seeks to retain and enhance access to community

services and facilities, including health facilities, educational facilities and open space. The NPPF recognises the benefits of a range of local provisions supporting community needs, including in rural areas. The framework seeks to protect settlement and community identities, including through the protection and retention of Green Belt land. Furthermore, the NPPF recognises the benefits of creating cohesive communities, in safe environments where crime and the fear of crime do not undermine the quality of life of residents.

- The DDNP will also be required to be in general conformity with the Local Plans covering the DDNP which contain policies specifically relating to housing, community services and facilities, accessibility and infrastructure requirements.
- The district housing, homelessness and community strategies each seek to support the appropriate delivery of housing and community infrastructure. The strategies recognise the importance of targeting resources at those most at risk/ most vulnerable and supporting all residents needs for affordable, safe and good quality housing in the right places. Furthermore, the strategies recognise the need to create choice in terms of securing a long-term stable home and create adaptable homes supported by high levels of accessibility.

Baseline review

The DDNP area is formed of the seven parishes of:

- Diss;
- Roydon;
- Scole;
- Burston and Shimpling;
- Palgrave;
- Stuston; and
- Brome and Oakley.

Diss, Roydon, Scole and Burston and Shimpling lie within the boundaries of South Norfolk, whereas Palgrave, Stuston and Brome and Oakley lie within the boundaries of Mid Suffolk.

The latest **population estimates** for each parish (based on best-fitting output areas⁵⁴) are identified in **Table AB.10** below, which totals 14,892 residents across the whole DDNP area in mid-2019. **Table AB.10** further identifies the population percentage increase for each area, and the DDNP area (as a whole) between the period 2001 and 2019.

Diss, Palgrave and Brome and Oakley have experienced the highest rates of growth since 2001. At Diss, this is broadly in-line with the average rate of growth for the District (South Norfolk), however at Palgrave and Brome and Oakley the growth

⁵⁴ ONS (2020) Parish population estimates for mid-2001 to mid-2019 based on best-fitting of output areas to parishes [online] available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/adhocs/12324parishpopulationestimatesformid2001tomid2019basedonbestfittingofoutputareastoparishes>

experienced is slightly higher than that experienced at the District level (Mid Suffolk). At Roydon, Scole, Burston and Shimpling, and Stuston, growth has been relatively low when compared to the average rate of growth for the District.

Overall, growth within the DDNP area, South Norfolk and Mid Suffolk is slightly higher than the estimated average growth for the East of England and England over the period 2001 – 2019.

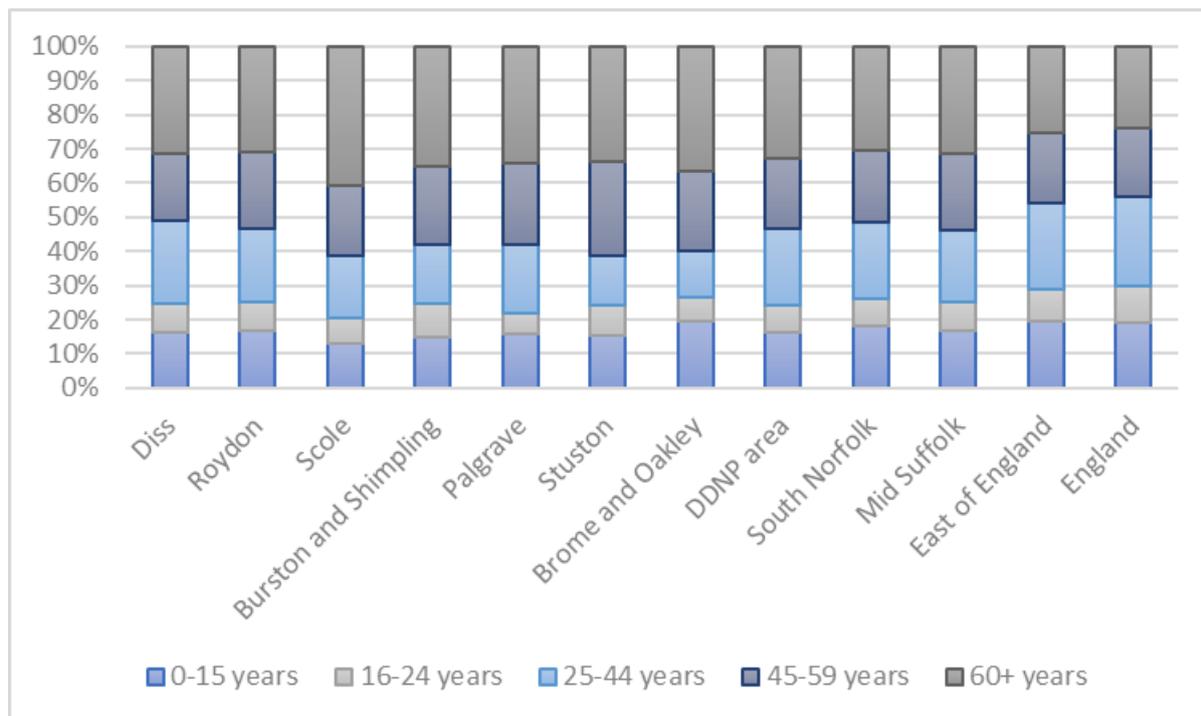
Table AB.10: Population estimates, 2001 – 2019⁵⁵

	2001 population estimate	2011 population estimate	Mid-2019 population estimate	Population increase mid-2001 to mid-2019
Diss	6,815	7,592	8,604	+26.3%
Roydon	2,306	2,452	2,595	+12.5%
Scole	1,339	1,365	1,432	+6.9%
Burston and Shimpling	525	572	564	+7.4%
Palgrave	743	902	937	+26.1%
Stuston	181	195	201	+11%
Brome and Oakley	428	477	559	+30.6%
DDNP area	12,337	13,555	14,892	+20.7%
South Norfolk	110,710	124,012	140,880	+27.3%
Mid Suffolk	86,837	96,731	103,895	+19.6%
East of England	5,388,140	5,846,965	6,236,072	+15.7%
England	49,138,831	53,012,456	56,286,961	+14.5%

The **age structure** for residents in each parish area in mid-2019 is depicted in **Figure AB.8**. Most residents in the DDNP area are aged over 60 years and in all parishes, this is proportionately higher than found at the district, regional and national scale. With a proportionately higher level of elderly residents, there is a contrasting lower proportion of younger residents in the DDNP, in the 0-15 years, and 16-24 years age groups.

⁵⁵ Nomis (2020) Census Statistics (2011 Data Catalogue and 2001 Data Catalogue) [online] available at: <http://www.nomisweb.co.uk/default.asp> and ONS (2020) Parish population estimates for mid-2001 to mid-2019 based on best-fitting of output areas to parishes [online] available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/adhocs/12324parishpopulationestimatesformid2001tomid2019basedonbestfittingofoutputareastoparishes> and AECOM calculations

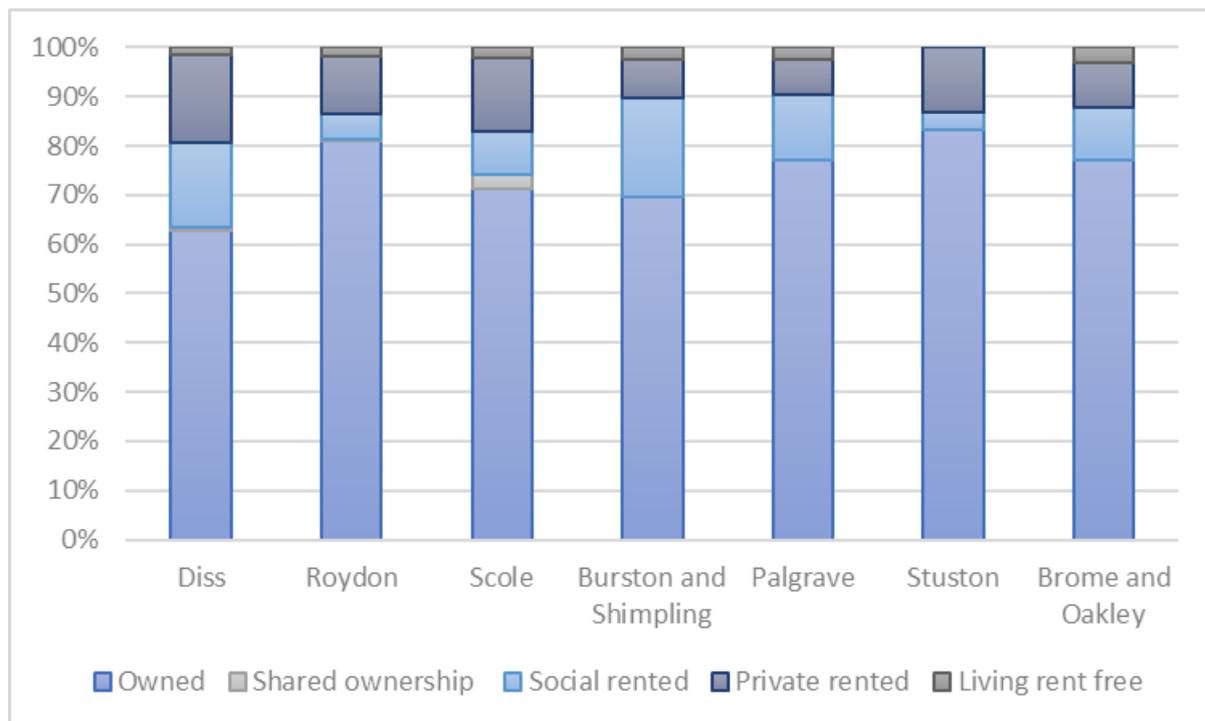
Figure AB.8: Age structure (mid-2019)⁵⁶



Housing tenure across the parish areas as captured in the 2011 census, is depicted in **Figure AB.9**. In all parishes, the predominant tenure is home ownership, and within this band, there is a higher proportion of outright ownership than ownership with a mortgage. There are limited shared ownership schemes across the DDNP area. In Diss, Roydon, Scole and Stuston, there is a higher proportion of private renting when compared to social renting, whereas the opposite is apparent in Palgrave, Brome and Oakley and Burston and Shimpling. There is a particularly higher proportion of social rented housing in Burston and Shimpling when compared to the other parish areas.

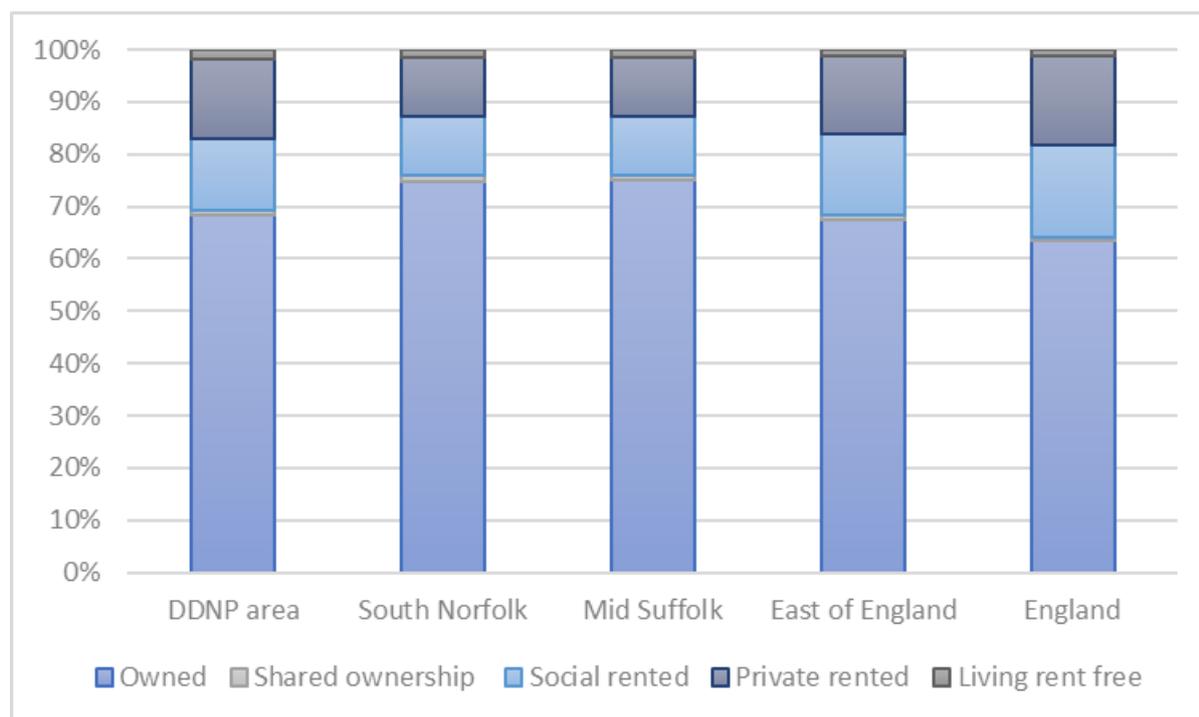
⁵⁶ ONS (2019) Mid-Year Population Estimates, AECOM calculations

Figure AB.9: Housing tenure in the DDNP area⁵⁷



The tenures across the DDNP area are contrasted with relative proportions for the district areas, region and England in **Figure AB.10**. This shows that whilst home ownership levels in the DDNP are proportionately higher than found in the East or in England, this level is slightly lower than experienced at the district scale. Levels of private renting are generally aligned with the findings for the East and for England, however, this contrasts with relative proportions in the district areas. Social renting levels in the DDNP area is also proportionately higher than that experienced at the district scale.

⁵⁷ ONS (2011) Census data, AECOM calculations

Figure AB.10: Housing tenure comparisons⁵⁸

The **Index of Multiple Deprivation** 2019 (IMD)⁵⁹ is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights. The seven deprivation domains span aspects of; income, employment, education, skills and training, health deprivation and disability, crime, barriers to housing and services, and living environment. Supplementary indices are also provided in relation to income deprivation affecting children and older people.

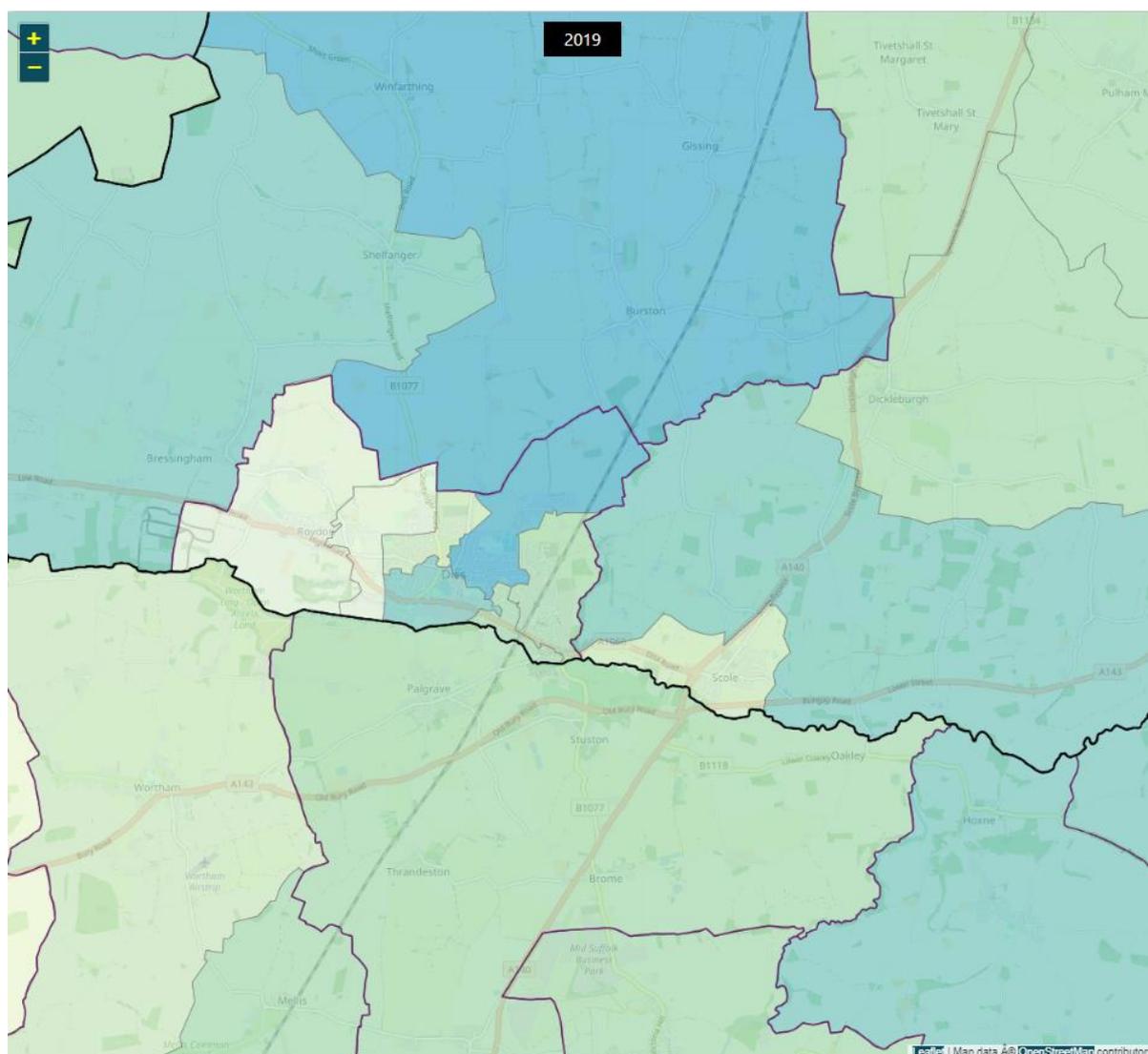
The IMD provides findings for Lower Super Output Areas (LSOAs). LSOAs are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2019, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived.

As depicted in **Figure AB.11**, the DDNP area is formed of the following eleven LSOAs which vary in terms of their overall rank in the 2019 IMD:

- South Norfolk 014B, 014E, 014F, 015A, 015B, 015D, 015E, 015F, 015G, 015H
- Mid Suffolk 001C

⁵⁸ ONS (2011) Census data, AECOM calculations

⁵⁹ DCLG (2019) Indices of Deprivation Explorer [online] available at: http://dclgapps.communities.gov.uk/imd/iod_index.html#

Figure AB.11: IMD, 2019⁶⁰

The areas of highest deprivation cover Burston and Shimpling and extend into areas of Diss, these areas fall within the 40% most deprived areas in the country. Areas in the south of Diss and in Scole also fall within the 50% most deprived areas. In contrast, the settlement areas of Scole and Roydon fall within the 30% least deprived areas in the country.

Within the areas of highest deprivation, income deprivation is relatively high and affects children more than the elderly. Employment, health deprivation and education, skills and training deprivation is also relatively high. However, these LSOAs perform better in relation to the barriers to housing and services, crime and the living environment domains.

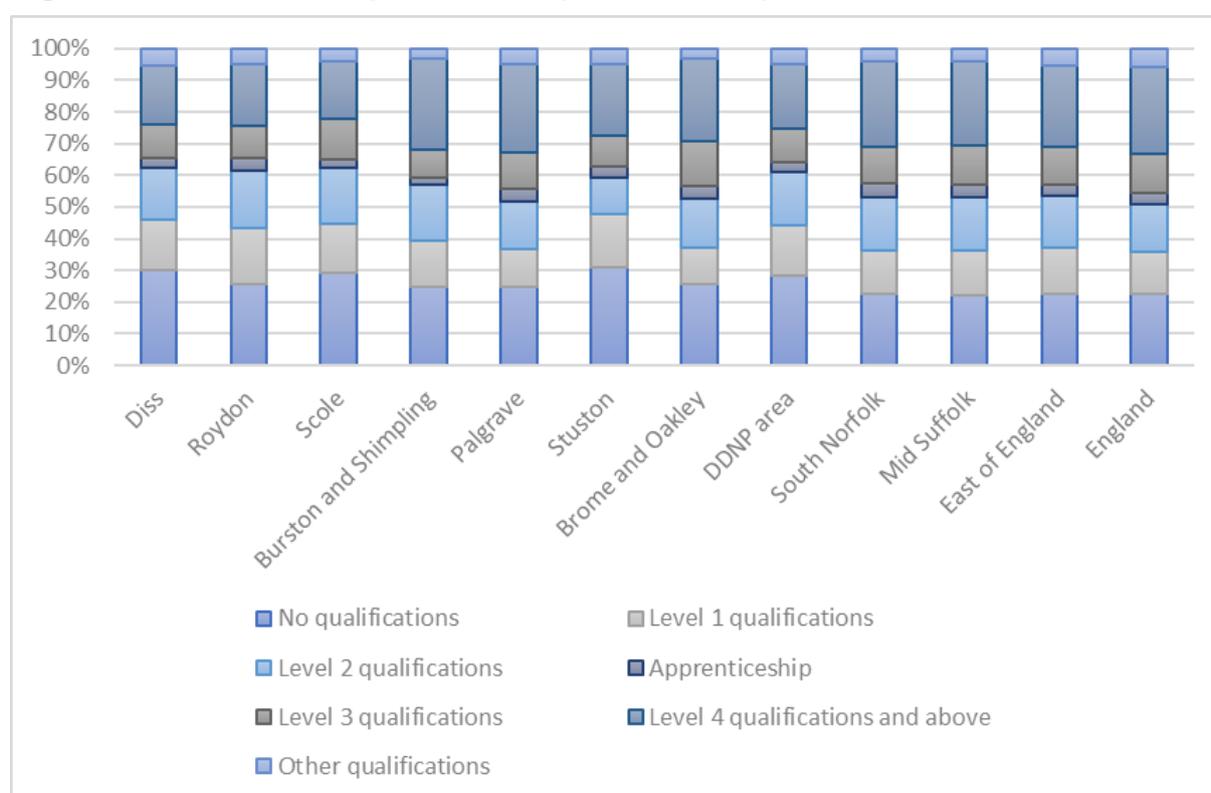
Of note, outside of Diss and Roydon the remaining area is notably deprived in terms of the living environment domain. Areas outside of Diss, Roydon and Scole are also notably deprived in terms of barriers to housing and services. However, Roydon does experience higher levels of deprivation in relation to the education, skills and training domain.

⁶⁰ Ibid.

In terms of **access to education**, there are primary schools and pre-schools/ day care facilities in the DDNP area, located in Diss, Roydon, Scole, Burston and Palgrave. Further primary schools are in the immediate surrounds of the Plan area, including at Dickleburgh, Bressingham, Wortham, Mellis, and Eye. There is only one senior school serving DDNP residents; located in Diss.⁶¹

2011 Census data indicates that there are a higher proportion of residents in the DDNP area with no qualifications when compared to relative proportions at the district level and in the East of England and England. This is paralleled with a lower proportion of residents in the DDNP area with Level 4 qualifications and above. Higher levels of residents with no qualifications is particularly pronounced within the parishes of Diss, Scole and Stuston; see **Figure AB.12**.

Figure AB.12: Level of qualification (Census 2011)⁶²



In terms of **access to employment**, whilst there are a number of local employers within the DDNP area, most are located within and surrounding Diss, including at Diss Business Park. The DDNP also has strategic road connections with Norwich, Thetford, Bury St Edmunds and Ipswich which provide further employment opportunities. Diss train station also provides direct rail access to Norwich, Stowmarket and Ipswich.

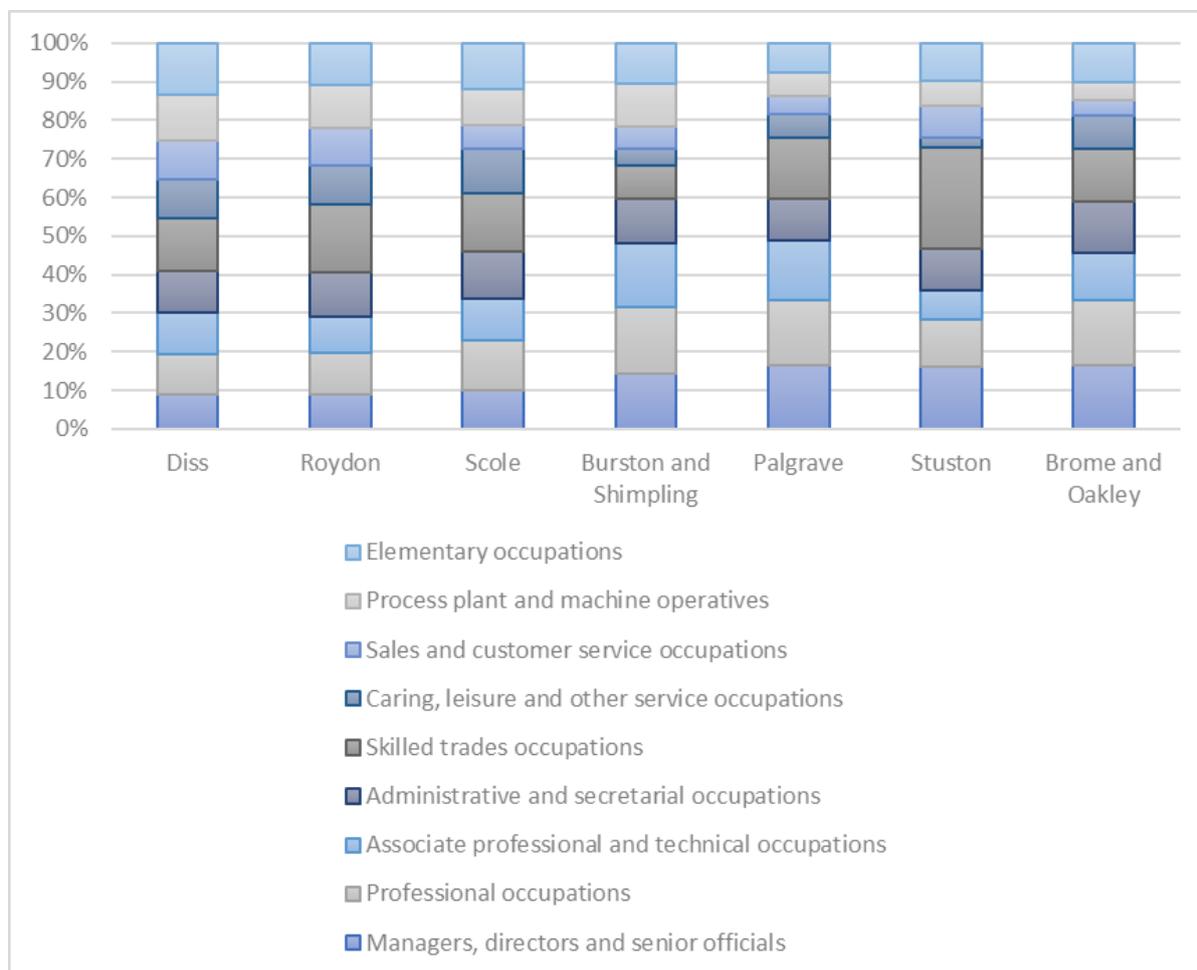
2011 Census data indicates that most DDNP residents aged 16 to 74 in employment are in the skilled trades occupations, followed by elementary occupations, professional occupations, associate professional and technical occupations, and administrative and secretarial occupations respectively. Burston and Shimpling diverges from this trend the most, with far fewer skilled trades occupations and a

⁶¹ Google maps

⁶² ONS (2011) Census data, AECOM calculations

greater number of residents in associate professional and technical occupations; see **Figure AB.13**.

Figure AB.13: Occupation of usual DDNP residents aged 16 to 74 in employment⁶³



In terms of **access to services and facilities**, the DDNP area contains a comprehensive range of facilities within Diss, situated around both Diss train station and Diss Mere. A more limited offer is also provided in Scole and Palgrave. Residents at Roydon, Burston and Shimpling, Stuston and Brome and Oakley are more reliant on access to the surrounding settlements, particularly Diss. Despite this, it is likely that residents will still travel to larger settlements such as Thetford, Bury St Edmunds, Norwich and Ipswich to access a wider range of services and facilities.

Future baseline

The population will continue to grow with or without the DDNP, however, with an ageing population and a higher proportion of elderly residents, it will be important for future development to address changing needs. Unplanned development may have wider implications in terms of delivering the right mix of housing types, tenures and sizes in suitably connected places. Continued development of housing types and tenures of market preference may introduce or exacerbate a housing imbalance and fail to meet any local needs for smaller homes to downsize into, or more affordable homes to retain and attract younger residents.

⁶³ ONS (2011) Census data, AECOM calculations

Considering the ongoing pandemic, homeworking is likely to become a more prevalent trend, and this is likely to alter the commuting patterns and access trends of residents into the future. Whilst uncertainty remains, the DDNP provides opportunities to guide development which accommodates for changing working patterns and lifestyles, and places greater emphasis on access to local services, facilities and employment options and strategic connectivity.

Health and wellbeing

Policy context

Table AB.11 presents the most relevant documents identified in the policy review for the purposes of the DDNP SEA.

Table AB.11: Plans, policies and strategies reviewed in relation to health and wellbeing

Document Title	Year of publication	Weblink
National Planning Policy Framework (NPPF)	2019	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf
The 25 Year Environment Plan	2018	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf
Health Equity in England: The Marmot Review 10 Years On	2020	https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on
Regulation 19 'Pre-Submission' Draft GNLP	2021	https://www.gnlp.org.uk/
Regulation 19 'Pre-Submission' draft Babergh and Mid Suffolk Joint Local Plan	2020	https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-r19-pre-submission/
South Norfolk Health and Wellbeing Strategy	2018	https://www.south-norfolk.gov.uk/sites/default/files/2018Health%20and%20Wellbeing%20Strategy.pdf
South Norfolk Leisure Strategy 2018-2021	2018	https://www.south-norfolk.gov.uk/sites/default/files/Leisure%20Strategy.pdf
Mid Suffolk Leisure Strategy	2017	https://www.babergh.gov.uk/assets/Communities/Sports-Leisure-and-Culture/Leisure-Strategy-2017.pdf

The key messages emerging from the review are summarised below:

- The DDNP will be required to be in general conformity with the NPPF, which seeks to enable and support healthy lifestyles through provision of appropriate infrastructure, services and facilities, including; green infrastructure, access to healthier food, allotments and layouts that encourage walking and cycling. The NPPF recognises the role of development plans in helping to deliver access to high quality open spaces and opportunities for sport and physical activity which contribute to the health and wellbeing of communities. The health benefits of access to

nature, green spaces and green infrastructure is further reiterated through the 25-year Environment Plan.

- The 2020 Health Equity in England report identifies that the health gap between less and more deprived areas has grown in the last decade, where more people can expect to spend more of their lives in poor health, and where improvements to life expectancy have stalled, or even declined for the poorest 10% of women.
- The DDNP will also be required to be in general conformity with the Local Plans covering the area, which contain policies directly relating to access to healthcare, green infrastructure and open spaces, and design that supports active travel opportunities.
- The South Norfolk Health and Wellbeing Strategy and the district leisure strategies identify local health challenges, particularly those presented to communities in a rural district area. This includes an ageing population with an array of challenges related to frailty, mobility, social isolation and illness. The strategies also recognise the role that leisure opportunities play in contributing to a wider range of health determinants. Diss is recognised for the strategic contribution its leisure centre plays in community access to recreational opportunities.

Baseline review

The 2019 **Health Profiles** for South Norfolk⁶⁴ and Mid Suffolk⁶⁵ identify that the health of people in both districts is generally better than the England average. Life expectancy for both men and women is higher than the England average. Whilst there are around 3,800 children (across both district areas) who live in low-income families, there are lower than average levels of childhood obesity, and in South Norfolk levels of teenage pregnancy and GCSE attainment are better than the England average.

In South Norfolk, health indicators performing significantly worse than the England average are:

- Killed and seriously injured (KSI) rate on England's roads;
- Estimated diabetes diagnosis rate; and
- Estimated dementia diagnosis rate.

In Mid Suffolk, health indicators performing significantly worse than the England average are:

- Estimated diabetes diagnosis rate; and
- Percentage of adults classified as overweight or obese.

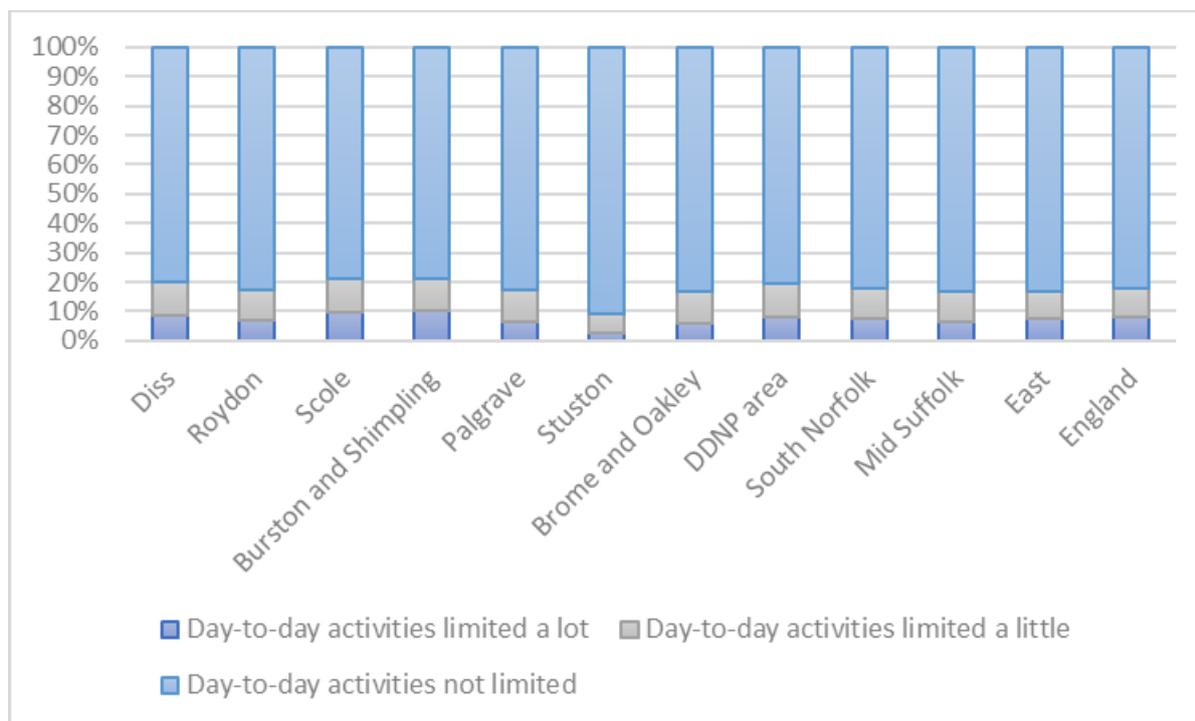
2011 Census data indicates that over 80% of residents with **disabilities** in the DDNP area do not consider themselves to be limited in their day-to-day activities. Disabled residents who consider their activities are limited a lot are more prevalent in Scole

⁶⁴ Public Health England (2020) South Norfolk Local Authority Health Profile 2019 [online] available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E07000149.html?area-name=South%20Norfolk>

⁶⁵ Public Health England (2020) Mid Suffolk Local Authority Health Profile 2019 [online] available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E07000203.html?area-name=Mid%20Suffolk>

and Burston and Shimpling, and to a slightly lesser extent in Diss and Roydon; see **Figure AB.14**.

Figure AB.14: Disability



Research into hidden needs in Suffolk highlights additional challenges facing rural communities in the county, such as higher domestic fuel costs, extra transport costs, social isolation, poor broadband and mobile phone network connectivity, and reduced accessibility to healthcare services, education services and employment opportunities.⁶⁶

In terms of **access to healthcare**, the closest hospital to the DDNP area is Hartismere Hospital at Eye (just outside of the Plan area, south of Brome). There are also GP surgeries and dental practices located at Diss, and mental health practices in both Roydon and Burston.⁶⁷

The **Norfolk Green Infrastructure Mapping Report**⁶⁸ identifies that the DDNP connects to both Norfolk Trail routes and Strategic Green Infrastructure (GI) Corridors; providing strategic active travel connections and recreational opportunities. The trails and GI corridors largely follow the River Waveney and extend north through the Plan area to connect with Norwich as well as north and east to connect with designated coastal landscapes (The Broads National Park, Norfolk Coast Area of Outstanding Natural Beauty (AONB), and Suffolk Coast and Heaths AONB).

Despite this connectivity, the **Norfolk Accessible Natural Greenspace Standards (ANGSt) Maps**⁶⁹ identify that Shimpling is an area that does not meet the standards for access (within 300m) to greenspace of 2ha or more. All settlements in the north

⁶⁶ Healthy Suffolk (2019) State of Suffolk Report 2019 [online] available at: <https://www.healthysuffolk.org.uk/jsna/state-of-suffolk-report>

⁶⁷ Google maps

⁶⁸ Norfolk Biodiversity Partnership (2017) Green Infrastructure Mapping Report [online] available at: <http://www.norfolkbiobiodiversity.org/publications/>

⁶⁹ Norfolk Biodiversity Partnership (2018) Accessible Natural Greenspace Standards (ANGSt) Maps [online] available at: <http://www.norfolkbiobiodiversity.org/publications/>

of the Plan area (that fall within the South Norfolk boundary) are further identified as lacking access to greenspace of 20ha or more (within 2km) and 100ha or more (within 5km). This indicates the importance of local green spaces in the context of existing strategic provisions.

The Babergh and Mid Suffolk Open Space Assessment⁷⁰ identify both the River Waveney and the River Dove as contributors to recreational landscapes, including the water meadows surrounding the River Dove. The assessment identifies the provisions of; amenity greenspace, playspace and cemeteries and churchyards in Palgrave, a larger provision of amenity greenspace in Stuston and cemeteries and churchyards only in Brome and Oakley. Despite these provisions, in each parish shortfalls are identified for allotment space, parks and recreation grounds, and play space. Shortfalls in amenity greenspace provisions are also identified in Palgrave and Brome and Oakley.

Future baseline

With an ageing population and higher proportion of elderly residents, the accessibility of development will be particularly important in terms of supporting resident health and wellbeing. The important of local services and facilities, and access to open green spaces and recreational areas has been further highlighted through the ongoing pandemic. Furthermore, as a rural area, residents are more susceptible to social isolation. These factors are more likely to be appropriately considered and addressed through planned development rather than unplanned development.

Transportation

Policy context

Table AB.12 presents the most relevant documents identified in the policy review for the purposes of the DDNP SEA.

Table AB.12: Plans, policies and strategies reviewed in relation to transportation and movement

Document Title	Year of publication	Weblink
National Planning Policy Framework (NPPF)	2019	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf
The Transport Investment Strategy – Moving Britain Ahead	2017	https://www.gov.uk/government/publications/transport-investment-strategy
The Department for Transport's Cycling and Walking Investment Strategy	2016	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/512895/cycling-and-walking-investment-strategy.pdf
Decarbonising Transport: Setting the Challenge	2020	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf

⁷⁰ Ethos Environmental Planning (2019) Babergh and Mid Suffolk Open Space Assessment 2016 – 2036 [online] available at: <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Babergh-and-Mid-Suffolk-Open-Space-Study-May-2019.pdf>

Document Title	Year of publication	Weblink
Norfolk Local Transport Plan 4 (2020-2036) – Consultation Document	2020	https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/roads-and-travel-policies/local-transport-plan
Suffolk Local Transport Plan 2011 - 2031	2011	https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans/
Norfolk Cycling and Walking Strategy	2015	https://www.norfolk.gov.uk/roads-and-transport/alternative-ways-to-travel/cycling
Regulation 19 'Pre-Submission' Draft GNLP	2021	https://www.gnlp.org.uk/
Regulation 19 'Pre-Submission' draft Babergh and Mid Suffolk Joint Local Plan	2020	https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-r19-pre-submission/
Diss Network Improvement Strategy	2020	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

The key messages emerging from the review are summarised below:

- The DDNP will be required to be in general conformity with the NPPF, which seeks the consideration of transport issues from the earliest stages of plan-making and development proposals to address any known issues and maximise opportunities to increase accessibility, particularly by walking, cycling and public transport. Larger developments are expected to be delivered in areas which are or can be made sustainable by limiting the need to travel and offering a genuine choice of transport modes. However, it is recognised that sustainable transport solutions will vary between urban and rural environments.
- National transport strategies set out investment priorities which ultimately all seek to improve the connectivity, effectiveness and reliability of transport networks, whilst reducing impacts on the natural environment (including through decarbonisation). Furthermore, they place great emphasis on making cycling and walking the natural choice for shorter journeys, or as part of a longer journeys. This includes investment in new and upgraded infrastructure, changing perceptions and increasing safety.
- The Local Transport Plans identify the transport investment priorities and policies at a more localised scale, but ultimately complement the aims of the national strategies discussed above. Alongside the transport and access policies of the Local Plans covering the DDNP area, the DDNP will be required to be in general conformity with the strategic policy aims.
- Of particular relevance is the Diss Network Improvement Strategy which identifies potential measures to help address existing transport network constraints and potential transport improvements to facilitate growth in the DDNP area (as explored further through the baseline).

Baseline review

The DDNP area is connected by the A140, A1066 and A143 strategic road connections. Regular rail services on the Norwich to London railway line are also provided via Diss train station. Diss provides a range of services and facilities, with 160 town centre retail and business units captured in the 2019 Norfolk Market Town Centre Report⁷¹; enabling nearby residents with high levels of accessibility in this respect. Bus accessibility is concentrated along key routes such as the A143 and A1066 linking Palgrave, Roydon, Diss, Scole and Stuston, as well as Burston and Shimpling and Brome and Oakley; albeit with less frequent services here.

In terms of walking routes, as well as linking with Norfolk Trails (see Strategic Green Infrastructure connections in Chapter 5), the DDNP area contains a significant number of public footpaths. These are particularly prevalent within Burston and Shimpling.⁷²

Congestion is a known issue in Diss, along the A1066 and Vince's Road. The **Diss Network Improvement Strategy**⁷³ (DNIS) identifies that 17% of the traffic within Diss is through traffic. Furthermore, given existing congestion issues, any large-scale growth either to the north or south of Diss, even if it were to provide a link road, would worsen traffic conditions within the town.

The DNIS identifies key opportunities to encourage short trips to be made on foot or by cycle through small infrastructure improvements, including improved signage. Additionally, the strategy identifies that the Morrisons Roundabout junction should be the focus of improvement on the A1066. Short-term, medium-term and long-term actions are identified to address the traffic issues observed in Diss, and this includes junction capacity improvements, footpath and cycle route improvements and extensions, new pedestrian crossings, additional cycle parking provisions and new signage.

The DNIS interrogates 2011 Census data, demonstrating that in the most accessible part of the DDNP area, over 75.7% of households still have access to at least one car or van, and that most travel to work journeys were made by car in 2011. However, it is recognised that the ongoing pandemic has created a large shift towards homeworking and has ultimately affected commuting patterns across England. These new trends are also likely to prevail to some degree.

Future baseline

Diss market town centre is particularly susceptible to development in the DDNP area in terms of increased traffic and congestion. Evidence suggests that even strategic intervention (such as a bypass) is unlikely to sufficiently address the likely increases in congestion. Planned development which maximises sustainable transport connections, reduces the need to travel, and delivers appropriate infrastructure capacity upgrades will ultimately be crucial to addressing these constraints.

However, homeworking is likely to continue to be a more prevalent trend as we emerge from the current pandemic, which can continue to support reduced impacts in terms of traffic and congestion.

⁷¹ Norfolk County Council (2019) Norfolk Market Town Centre Report [online] available at: <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/monitoring-land-use-policies>

⁷² Rights of Way maps [online] available at: <https://www.rowmaps.com/>

⁷³ 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>

