

Strategic Environmental Assessment (SEA) for the Dickleburgh and Rushall Neighbourhood Plan

Non-Technical Summary

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Quality information

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Non-Technical Summary (NTS)

This is the Non-Technical Summary (NTS) for the Dickleburgh and Rushall Neighbourhood Plan Strategic Environmental Assessment (SEA) Environmental Report (available separately).

Introduction

AECOM is commissioned to lead on SEA in support of the emerging Dickleburgh and Rushall Neighbourhood Plan (D&RNP).

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 D&RNP is a legal requirement¹.

The D&RNP is being prepared by the Parish Council in the context of the adopted South Norfolk Local Plan (SNLP). Once 'made' the D&RNP will have material weight when deciding on planning applications, alongside the SNLP.

The SEA Environmental Report will be published alongside the 'pre-submission' version of the Plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended). This NTS is available separately and provides a brief overview of the detail contained within the Environmental Report.

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?

The D&RNP has a clear vision, which is:

"The nature and character of our rural villages will be preserved and retained, in order to meet the various needs of residents, contribute to a high quality of life and provide opportunity and choice. This will be achieved in ways that make effective use of natural resources, enhance the environment and natural diversity, promote social inclusion, and supports the local economy."

¹ The D&RNP was subject to informal screening by South Norfolk Council in 2021 and Scoping consultation in 2022 sought the wider opinions of statutory consultees.

To achieve this vision, the following eleven objectives have been identified, across three themes:

Housing

Objective 1: To provide sufficient and appropriate high-quality housing in small-scale developments to meet local needs within a balanced housing market.

Objective 2: To provide mixed-use development that complements the character and heritage of the rural villages of Dickleburgh and Rushall.

Transport

Objective 1: Address the issue of significant numbers of lorries and HGVs travelling through areas of the parish judged to be hazardous and perilous to both pedestrians and the environment.

Objective 2: Improve the safety of pedestrians and residents of the parish.

Objective 3: Reduce traffic congestion in the parish.

Objective 4: To future proof the housing infrastructure to support environmentally friendly transport.

Environment and Biodiversity

Objective 1: To put in place measures and policies that; ensure the protection and enhancement of all our natural habitats, including hedgerows, coppices, ditches, and key natural environmental assets, in order to encourage an increase in biodiversity across the parish and provide environments conducive to maintaining healthy populations of birds, bats and other fauna. An element of this will require developers planting native green hedging rather than solid wood fencing and providing additional habitats and wildlife corridors for hedgehogs and other small mammals, enabling free roaming into and through the development and hamlet or village.

Objective 2: To Protect and promote an increase of green footpaths, bridleways, and cycleways to further enable public access to open countryside, green sites for community use and woodlands, including any new parish woodlands. And protect and enhance vistas and views of significance within the parish.

Objective 3: To ensure the maintenance of distinct settlements and define clear settlement gaps to ensure the continuance of these distinct and separate settlements. For the sake of this document, a separate settlement can be distinguished by the separation of dwellings from larger settlements/hamlets by a field or defined boundary.

Objective 4: To challenge environmental risk and promote carbon offsetting by supporting creative thinking and solutions that safeguard and enhance the natural environment. To promote, within the design/build of new developments, features such as permeable driveways / hard standing, provision of green energy, green walls, green roofing, water harvesting and full utilisation of grey water solutions.

Objective 5: Establish clean environment policies to address issues of pollution and promote wellbeing and improved public health. This will include a 'beautification' policy as part of the approach to promote well-being by improving the overall visual enhancement and character of the parish.

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 below, and a full framework which includes assessment questions is provided within the main Environmental Report (see **Table 3.2**).

SEA theme	SEA objective(s)
Biodiversity and geodiversity	<ul style="list-style-type: none"> Protect and enhance biodiversity and geodiversity.
Climate change	<ul style="list-style-type: none"> Reduce the contribution to climate change made by activities within the neighbourhood area. Support the resilience of the neighbourhood area to the potential effects of climate change, including flooding.
Landscape	<ul style="list-style-type: none"> To protect and enhance the character and quality of the immediate and surrounding landscape and villagescape.
Historic environment	<ul style="list-style-type: none"> Protect, conserve and enhance the historic environment within and surrounding the neighbourhood area.
Land, soil and water resources	<ul style="list-style-type: none"> Ensure the efficient and effective use of land. Protect and enhance water quality and use and manage water resources in a sustainable manner.
Community wellbeing	<ul style="list-style-type: none"> Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Transportation	<ul style="list-style-type: none"> 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 to the allocation of land for housing, or alternative sites.

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 establishing the preferred option, in light of the assessment.

The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:

- D&RNP objectives, particularly the housing objective to provide sufficient and appropriate high-quality housing to meet local needs;
- 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 the other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

Establishing the reasonable alternatives

The Environmental Report explains how reasonable alternatives were established after a process of considering the strategic policy context ('top down' factors) and the site options in contention for allocation ('bottom-up' factors).

This work identified four site options with the potential to deliver growth within Dickleburgh and Rushall. These options as listed below are depicted in **Figure 5.1** of the Environmental Report, and form the alternative options for appraisal:

- **Option 1** – Site 1, West of Norwich Road (25 to 30 dwellings).
- **Option 2** – Site 4, East Ipswich Road (35 to 45 dwellings).
- **Options 3** – Site 2, Off Ipswich Road West, and Site 3, West Ipswich Road (20 to 28 dwellings combined).
- **Option 4** – Site 18, West of Norwich Road (92 to 153 dwellings)

Assessing the reasonable alternatives

The table overleaf presents summary findings for the assessment of these options, with detailed findings presented in **Chapter 6** of the Environmental Report.

For each option, the assessment examines likely significant effects, drawing on the sustainability themes and objectives identified through scoping. Green indicates significant positive effects and red indicates significant negative effects. Where appropriate, uncertainty is also noted. Efforts are also 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.

SEA topic		Option 1	Option 2	Option 3	Option 4
Biodiversity and geodiversity	Significant effect?	No	No	No	No
	Rank	2	1	1	3
Climate change	Significant effect?	No	No	No	Yes – negative
	Rank	2	1	1	3
Landscape	Significant effect?	No	No	No	Yes – negative
	Rank	2	2	1	3
Historic environment	Significant effect?	Uncertain	No	Yes – negative	Uncertain
	Rank	1	1	2	1
Land, soil and water resources	Significant effect?	No	No	No	No
	Rank	1	1	2	2
Community wellbeing	Significant effect?	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	2	2	2	1
Transportation	Significant effect?	No	No	No	No
	Rank	1	1	1	1

All options are considered likely to lead to **significant positive effects** regarding the community wellbeing SEA topic. This is because all options meet the required housing need of the neighbourhood area, including an assumed proportion of affordable homes. All options are also within walking distance to the Local Green Space (LGS) as identified in the draft D&RNP.

Overall, **Options 1 and 2** perform most favourably and do not lead to any significant negative effects. Whilst uncertainty is noted for Option 1 regarding the historic environment SEA topic, due to its proximity to the Dickleburgh Conservation Area and Dickleburgh Moor, which contains archaeological remains sensitive to disturbance, this option remains relatively unconstrained.

Options 3 and 4 perform less favourably. While Option 3 is only considered likely to lead to significant negative effects for the historic environment SEA topic, Option 4 is predicted to lead to significant negative effects for the climate change and landscape SEA topics, making it the worst performing option. However, it is noted that the full capacity of Option 4 is unlikely to be delivered as it exceeds the required housing need for the neighbourhood area. In this respect, significant negative effects concerning these SEA topics could be mitigated to some degree by delivering a reduced number of houses. Uncertainty regarding the historic environment SEA topic is noted for Option 4 as it has potential to disturb archaeological remains in Dickleburgh Moor.

Developing the preferred approach

The Parish Council's reasons for developing the preferred approach (**Option 1**) in light of the alternatives assessment are identified below:

*“A survey of local residents conducted in 2019 identified four sites as possible sites for development. The four sites identified were sites 1, 2, 3 and 4 as shown in **Figure 5.4** in **Chapter 5** in the main body of the report.*

The Steering Group met in June 2019 to assess all available sites. All sites put forward by developers were subject to a Suitability Assessment (SA) created by the Steering Group and based upon the South Norfolk HEELA. Four sites emerged from that process as possible sites for development – sites 1, 2, 3 and 4 – and the highest scoring site was site 1. Sites 1 and 4 were deemed able to deliver the 25 homes on a single site. All other sites failed the SA tests.

There then followed a series of meetings to test the sites and arrive at an agreed preferred site/ sites. It was agreed on 17th September 2020 that the final sites going forward would be sites 1 and 2.

With regard to site 2, the proposals put forward to the Steering Group do not conform to rurality, parking, and density requirements. Moreover, densities, as indicated by the developer, were deemed unacceptable.

*Specifically, the developer declared that they would only be interested in developing the site if they were given additional permissions to extend the site to include the area referred to as N3 in **Figure 5.4** in **Chapter 5**. This request was rejected, and as a result, the developer withdrew their interest on 22nd September 2021.*

In light of the above, site 1 became the preferred site, providing that the aspects below can be met:

Cordon sanitaire² (400 metres) – no building within the limits of the cordon sanitaire.

Heritage views maintained.

Heritage sites protected.

Views and vistas maintained; in particular, views from the Norwich Road across to the A140, views to the church, and views from the church.

Footpath 3 – a green walk (path) which should remain a green walk (path).

Rurality.

Flooding of the Norwich Road – flooding regularly occurs; the site must not exacerbate this issue.”

² The term 'cordon sanitaire' refers to a buffer zone around a sewage works.

Assessment findings at this stage

Part 2 of the Environmental Report presents an assessment of the pre-submission version of the D&RNP. Assessment findings are presented as a series of narratives under the 'SEA framework' topic headings. The following conclusions are reached:

Significant positive effects are only anticipated for the community wellbeing SEA topic. This is because the spatial strategy exceeds the identified local housing need, locating development close to existing services and facilities in Dickleburgh Village, whilst the D&RNP policy framework seeks to protect community assets and prioritises the wellbeing of residents.

Minor positive effects are considered likely for the biodiversity and geodiversity and landscape SEA topics. With respect to biodiversity and geodiversity, the policy framework seeks to protect priority species and habitats, enhance the biodiversity value of LGSs, and deliver at least 10% net gain amongst other things. With respect to landscape, the spatial strategy avoids significant impacts arising by locating development adjacent to the existing settlement, outside of the identified settlement and local gaps. Whilst the spatial strategy will lead to the loss of greenfield land, it is recognised that this is largely unavoidable. The policy framework strengthens the spatial strategy by mitigating any adverse impacts of development and protecting and enhancing the local landscape and villagescape.

Broadly **neutral effects** are concluded for the climate change SEA topic because, by recognising growth will occur with or without the D&RNP, the increase in the built footprint of the neighbourhood area and absolute emissions are not considered a consequence of the plan. On this basis, and alongside the avoidance of significant effects in relation to flood risk, no significant deviations from the baseline are anticipated.

Uncertainty is noted for the historic environment and land, soil and water resources SEA topics. With respect to the historic environment, the policy framework performs well and is considered likely to ensure that new development is in keeping with the character of Dickleburgh village. However, there is a degree of uncertainty surrounding the recent archaeological finds at Dickleburgh Moor. With respect to land, soil and water resources, whilst the allocated site will lead to the loss of greenfield land, it is recognised that this is largely unavoidable. The spatial strategy delivers development adjacent to the Dickleburgh Stream and partially within the cordon sanitaire. Whilst it is considered likely that this part of the site will not be development, this cannot be confirmed at this stage.

Finally, **minor negative effects** are anticipated for the transportation SEA topic. It is recognised that growth is anticipated in the neighbourhood area with or without the D&RNP, and therefore increases in vehicle use on local roads are an inevitable evolution of the baseline. In addition, the spatial strategy locates development close to local services and facilities and the bus stop in Dickleburgh village, and the policy framework seeks to mitigate adverse effects of new development, including traffic and congestion and road safety. However, given the limited services and facilities and public transport options available, residents will still likely rely on the private car to a considerable degree.

Cumulative effects

Alongside the provisions of the Greater Norwich Local Plan (GNLP), Village Clusters Housing Allocations Plan (VCHAP) and NPPF, the D&RNP seeks to support housing delivery in line with forecasted needs over the plan period whilst avoiding significant negative effects in relation to the SEA topics explored above. In this respect, positive cumulative effects are anticipated.

Recommendations

As the D&RNP avoids any significant negative effects, no specific recommendations are made at this stage.

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 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.

Assuming the examination leads to a favourable outcome, the Neighbourhood Plan will then be subject to a referendum, organised by South Norfolk Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the D&RNP will become part of the Development Plan for South Norfolk Council, covering the defined neighbourhood 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 D&RNP will be undertaken by South Norfolk Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the D&RNP that would warrant more stringent monitoring over and above that already undertaken by South Norfolk Council.