

SAHAM TONEY NEIGHBOURHOOD
DEVELOPMENT PLAN

2019 – 2036



SITE SELECTION REPORT

2nd Edition, May 2020

TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY	7
2.0 OBJECTIVES	8
PART ONE: THE SELECTION OF SITES FOR ALLOCATION IN THE REGULATION	
14 PRE-SUBMISSION OF THE NEIGHBOURHOOD PLAN.....	9
3.0 INTRODUCTION TO PART ONE	9
4.0 OVERALL HOUSING ALLOCATION.....	12
5.0 STATUS OF POTENTIAL SITES FOLLOWING INDEPENDENT ASSESSMENT	14
6.0 PROCESS OF SITE SELECTION	17
7.0 SITE CONSTRAINT CONDITIONING	19
7.3 AECOM constraints.....	19
7.4 Local Highway Authority constraints.....	44
7.5 Anglian Water constraints	53
7.6 Lead Local Flood Authority constraints	55
8.0 OVERALL RESULTS OF CONSTRAINT CONDITIONING	59
9.0 POLICY AND SUSTAINABILITY CONFORMANCE CHECK.....	66
10.0 WEIGHTING OF SITE SELECTION RATING CRITERIA	81
11.0 SITE SELECTION RATINGS.....	82
12.0 PROVISIONAL PRE-SUBMISSION SITE SELECTION.....	101
13.0 REVIEW OF ANY CUMULATIVE IMPACT ON LANDSCAPE CHARACTER.	107
14.0 SITE STNP16 LANDSCAPE IMPACT REVIEW	120
15.0 INTERFACE WITH SITE PROPOSERS: SUGGESTED CONSTRAINT	
MITIGATIONS & DRAFT SITE POLICIES	129
16.0 FINAL PRE-SUBMISSION SITE SELECTION	138
17.0 PRE-SUBMISSION POLICY CONDITIONS FOR SELECTED SITES	142
18.0 TIMING OF DEVELOPMENT	142
19.0 UNDECIDED PLANNING APPLICATIONS	143
20.0 SUMMARY OF SITE ASSESSMENT & PRE-SUBMISSION SELECTION	
FINDINGS BY SITE.....	143

21.0 PRE-SUBMISSION CONCLUSIONS	145
APPENDIX A TO PART ONE: DETAILS OF SITES PUT FORWARD IN RESPONSE TO A CALL FOR SITES	146
APPENDIX B TO PART ONE: INFORMATION RELATING TO THE CONDITIONING OF SITE CONSTRAINTS.....	157
PART TWO: REMOVAL OF SITE ALLOCATIONS AS A RESULT OF REGULATION 14 CONSULTATION ON THE NEIGHBOURHOOD PLAN; MASTERPLANNING STUDIES & A PROFESSIONAL REVIEW OF LANDSCAPE IMPACT	170
22.0 PRE-SUBMISSION CONSULTATION WITH REGARD TO SITE SELECTIONS	170
23.0 MASTERPLANNING STUDIES	171
24.0 PROFESSIONAL REVIEW OF THE LANDSCAPE IMPACT OF MAJOR DEVELOPMENTS	180
25.0 UPDATED MATRIX ASSESSEMENT OF THE CUMULATIVE LANDSCAPE IMPACT OF SITES STNP4, 5 and 6.....	181
26.0 OTHER LANDSCAPE IMPACT FACTORS	187
27.0 SITE SELECTION ACTIONS AS A RESULT OF LANDSCAPE IMPACT REASSESSMENT	188
28.0 UPDATED SITE RATINGS AND RANKINGS	189
PART THREE: ASSESSMENTS TO VERIFY THE PLAN	192
29.0 STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA).....	192
30.0 HABITATS REGULATIONS ASSESSMENT (HRA)	193
PART FOUR: EVOLUTION OF SITE SELECTION “ROAD MAP” AND SUMMARY CONCLUSIONS OF THE THREE MAIN STAGES	194
31.0 OUTLINE OF PART FOUR	194
32.0 ROAD MAP	194

LIST OF TABLES

Table 1A: Summary Details of Sites Proposed by the Call for Sites.....	10
Table 1B: Evolution of Housing Numbers During the Pre-Submission Site Selection Process	10

Table 2A: Independent Site Assessment Findings	15
Table 2B: Summary of Independent Assessment Conclusions.....	16
Table 3: Conditioning of Highway Access Constraints.....	22
Table 4: Conditioning of Accessibility Constraints.....	24
Table 5: Conditioning of Environmental Designations Constraints.....	25
Table 6: Conditioning of Ecology Value Constraints.....	27
Table 7: Conditioning of Landscape Sensitivity Constraints.....	29
Table 8: Conditioning of Agricultural land Loss Constraints.....	31
Table 9: Conditioning of Heritage Impact Constraints	32
Table 10: Conditioning of Impact on Habitats and Biodiversity Constraints.....	35
Table 11: Conditioning of Ground Contamination Constraints	37
Table 12: Conditioning of Infrastructure Crossing Site Constraints	38
Table 13: Conditioning of Potential Coalescence Constraints.....	40
Table 14: Conditioning of Impact on Size / Character of Settlement Constraints	43
Table 15: Conditioning of Amenity Issue Constraints.....	44
Table 16: Local Highway Authority Site Assessments	48
Table 17: Anglian Water site assessment results	53
Table 18: Lead Local Flood Authority Site Assessments.....	58
Table 19. Summary of Site Assessment Results Following Conditioning	60
Table 20: Overall Summary Site Assessment Conclusions After Conditioning.....	61
Table 21: Summary Details of Proposed Sites After Constraint Conditioning.....	63
Table 22: Local Plan Sustainability Objectives.....	67
Table 23: List of Neighbourhood Plan Policies (at Pre-Submisison) and Their Relevance to Site Selection	70
Table 24: Surface Water Flood Risk for Each Site.....	80
Table 25. Rating criteria weightings	82
TABLE 26, CRITERION: DISTANCE TO A BUS STOP	82
TABLE 27, CRITERION: DISTANCE TO SERVICES / FACILITIES.....	83
TABLE 28, CRITERION: HOUSING MIX versus HOUSING NEEDS ASSESSMENT	83
TABLE 29, CRITERION: MAINTENANCE OF AMENITY.....	84
TABLE 30, CRITERION: HERITAGE ASSET SETTING IMPACT	85
TABLE 31, CRITERION: DENSITY	85
TABLE 32, CRITERION: HIGHWAY ACCESS - VISIBILITY	86
TABLE 33, CRITERION: HIGHWAY ACCESS – HIGHWAY WIDTH & FOOTPATHS.....	87
TABLE 34, CRITERION: SCALE & LOCATION versus CHARACTER & SENSITIVITY	89
TABLE 35, CRITERION: IMPACT ON LANDSCAPE CHARACTER	90
TABLE 36, CRITERION: PRESERVE / INCORPORATE KEY VIEWS	92
TABLE 37, CRITERION: NO UNDESIRABLE LOSS OF BIODIVERSITY	93
TABLE 38, CRITERION: FLOOD RISK – SEQUENTIAL TEST.....	94
TABLE 39, CRITERION: APPROPRIATE SURFACE WATER DRAINAGE MITIGATION MEASURES	95
TABLE 40, CRITERION: LOSS OF UNDEVELOPED LAND	95
TABLE 41, CRITERION: LOSS OF AGRICULTURAL LAND.....	96
TABLE 42, CRITERION: IMPROVE QUALITY / QUANTITY OF OPEN SPACE	97
Table 43: Rating of Sites Against Selection Criteria.....	99
Table 44: Weighted Results Table and Site Rankings	100
Table 45: Weighted Site Rankings	101
Table 46: Criteria Ratings for Sites STNP1, STNP4, STNP6, STNP9, STNP12, STNP13 and STNP14	104
Table 47: Weighted Criteria Ratings for STNP6, STNP9, STNP12, STNP13, STNP14 and STNP15 Compared with STNP4.....	105
TABLE 48. COMBINED LANDSCAPE SENSITIVITIES.....	111

TABLE 49: ASSESSMENT AGAINST INDICATORS OF VALUE / SENSITIVITY: Landscape.....	112
TABLE 50: ASSESSMENT AGAINST INDICATORS OF VALUE / SENSITIVITY: Visual and perceptual.....	114
TABLE 51: OVERALL LANDSCAPE SENSITIVITIES	116
TABLE 52: LANDSCAPE CAPACITY	116
Table 53: STNP456 Landscape Value Assessment.....	117
Table 54: Criteria to Establish Magnitude of Change	118
TABLE 55: IMPACT SIGNIFICANCE.....	118
Table 56: Impact Significance Descriptions	120
TABLE 57: STNP16 COMBINED LANDSCAPE SENSITIVITIES	120
TABLE 58: STNP16 ASSESSMENT AGAINST INDICATORS OF VALUE / SENSITIVITY: Landscape	121
TABLE 59: STNP16 ASSESSMENT AGAINST INDICATORS OF VALUE / SENSITIVITY: Visual and perceptual	123
TABLE 60: STNP16 OVERALL LANDSCAPE SENSITIVITIES	125
TABLE 61: STNP16 LANDSCAPE CAPACITY.....	125
Table 62: STNP16 Landscape Value Assessment.....	126
Table 63: Criteria to Establish Magnitude of Change	127
TABLE 64: STNP16 IMPACT SIGNIFICANCE	127
Table 65: Impact Significance Descriptions	128
Table 66: Revised “Traffic Light” Assessment of Sites STNP4-7	136
Table 66: Revised Rating of Sites Against Selection Criteria	139
Table 67: Weighted Results Table and Site Rankings Following Interface with Site Owners	140
Table 68: Summary of Policy Conditions	142
Table 69: Summary Findings for Each Site at Pre-Submission Stage.....	145
Table 70: Pre-Submission Site Allocations.....	145
Table 71: Proposed Sites Summary Information	146
TABLE 72: OVERALL LANDSCAPE SENSITIVITIES	183
TABLE 73: LANDSCAPE CAPACITY	183
Table 74: STNP456 Landscape Value Assessment.....	184
Table 75: Criteria to Establish Magnitude of Change	185
TABLE 76: IMPACT SIGNIFICANCE.....	186
Table 77: Impact Significance Descriptions	187
Table 78: Updated Site Selection Criteria Ratings.....	190
Table 78: Evolution of Site Allocation Housing Numbers.....	201

LIST OF FIGURES

Fig. 1: Location of Proposed Sites.....	11
Fig. 2: Site Selection Process Flowchart.....	18
Fig. 3 Paved footpaths on highway routes	47
Fig. 4: Amended Site Boundary for STNP5 in Response to AECOM Site Assessment	52
Fig. 5: Amended Site Boundary for STNP7 in Response to AECOM Site Assessment	52
Fig. 6: Revised Site Boundary for Site STNP1.....	64
Fig. 7: Revised Site Boundary for Site STNP5.....	64
Fig. 8: Revised Site Boundary for Site STNP7.....	65
Fig. 9: Revised Site Boundary for Site STNP16.....	65
Fig. 10: Environment Agency Surface Water Flood Risk Map for the Area	76
Fig. 11: Provisionally Allocated Sites at Pre-Submission Prior to Owner Discussions	106
Fig. 12: Sites to Be Reviewed for Cumulative Landscape Impact	107
Fig. 13: Main Settlement Gaps in the Area Under Review	109
Fig. 14: Key open spaces and views in area of combined sites	110

Fig. 15: Site STNP1 revised boundary	130
Fig. 16: Site STNP5 revised boundary	133
Fig. 17: Site STNP7 revised boundary	134
Fig. 18: Amended Site Boundary for Site STNP16	137
Fig. 19: Sites Allocated in the Pre-Submission Neighbourhood Plan	141
Fig. A1: STNP1 Site Plan	147
Fig. A2: STNP1 Indicative Site Layout	147
Fig. A3: STNP2 Site Plan and Indicative Layout.....	148
Fig. A4: STNP3 Site Plan	148
Fig. A5: STNP4 Site Plan	149
Fig. A6: STNP5 Site Plan	149
Fig. A7: STNP6 Site Plan	150
Fig. A8: STNP7 Site Plan	150
Fig. A9: STNP8 Site Plan	151
Fig. A10: STNP9 Site Plan And Indicative Layout	152
Fig. A11: STNP10 Site Plan	153
Fig. A12: STNP11 Site Plan	154
Fig. A13: STNP12 Site Plan	154
Fig. A14: STNP13 Site Plan	155
Fig. A15: STNP14 Site Plan	155
Fig. A16: STNP15 Site Plan	156
Fig. A17: STNP16 Site Plan	156
Fig. B1: Indicative site layout included with site proposal, showing proposed new site access	157
Fig. B2: Local Highway Authority Response to STNP1 Highway Access Proposal	160
Fig. B3: STNP2 Highway Access Upgrade Proposal.....	161
Fig. B4: Local Highway Authority Response to STNP2 Highway Access Upgrade Proposal.....	163
Fig. B5: STNP9 Highway and pedestrian access proposal.....	164
Fig. B6: Email from Local Highway Authority confirming footpath requirement for STNP9.....	165
Fig. B7: STNP12: New footpath provision.....	165
Fig. B8: STNP12 Local Highway Authority Correspondence re New Footpath Provision	167
Fig. B9: Local Highway Authority response to planning application 3PL/2015/0009/F	169
Fig. 20a: Masterplanning for Sites STNP1, 4, 5, 6 and 7 – Description and Key	172
Fig. 20b: Masterplanning for Sites STNP1, 4, 5, 6 and 7 – Plan	173
Fig. 21a: Masterplanning for Site STNP16 – Description and Key	174
Fig. 21b: Masterplanning for Site STNP16 – Plan	175
Fig. 22a: Illustrative view of sites STNP4-7 looking south	176
Fig. 22b: Illustrative view of sites STNP4 and STNP7 looking south (STNP5 and 6 removed).....	177
Fig. 22c: Illustrative view of sites STNP1 and STNP4-7 looking west from Chequers Lane	178
Fig. 22d: Illustrative view of sites STNP1, STNP4 and STNP7 looking west from Chequers Lane (STNP5 and 6 removed)	179
Fig. 23: Open Spaces and Key Views.....	182
Fig. 24: Earlier Refused Site Immediately to the South of Site STNP5	188

Revision History

Date	Description
July 2019	First issue, to support the Regulation 14 pre-submission of the Neighbourhood Plan
May 2020	Updated to reflect pre-submission consultation responses and the results of masterplanning studies, Strategic Environmental Assessment and Habitats Regulations Assessment

1.0 EXECUTIVE SUMMARY

1.1 With regard to housing and economic land availability assessment, Planning Practice Guidance states¹ “It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs.” It is the purpose of this report to do that.

1.2 The report comprises three parts:

1.2.1 **Part One** (sections 3-21, and appendices A and B), deals with the site selection process up to and including the Regulation 14 pre-submission of the Saham Toney Neighbourhood Plan on 19 August 2019. It explains how potential sites for allocation were identified and assessed. It describes the various independent site assessments that were performed and summarises the results of those assessments. It then gives details of how the results of the site assessments were reviewed, conditioned and filtered to establish which of the sites should be selected for allocation in the Saham Toney Neighbourhood Plan, including the selection of rating criteria and the way in which sites were judged against them. It also gives full details of the evolution of site parameters during the course of addressing constraints and rating each site, but for clarity, a summary of that is also given in section 3. Immediately prior to the pre-submission of the Neighbourhood Plan, the site selection process concluded that 11 sites were suitable for allocation in the Saham Toney Neighbourhood Plan, giving a combined total of 83 houses over the Plan period. Following consultation this was amended to 9 sites giving a total of 70 houses (see Part Two and the Consultation Statement) for details of the reasons for this.

1.2.2 **Part Two** explains how the pre-submission site selections were reviewed, and where applicable, amended in the light of:

- a) Representations made during the Regulation 14 consultation;
- b) An independent study of masterplanning options for the larger allocated sites / groups of sites; and
- c) A professional review of the potential landscape impact of the larger allocated sites / group of sites.

1.2.3 **Part Three** collates and summarises the key conclusions of Parts One and Two, and provides a ‘road map’ of the evolution of site selection throughout the process of allocating sites in the Neighbourhood Plan.

1.3 The overall conclusions of this report are given below:

1. As a result of a rigorous process of analytical and objective review, and taking account of the formal Regulation 14 pre-submission consultation on the Neighbourhood Plan and subsequent additional studies, it is concluded that of the 16 residential sites put forward for allocation in the Saham Toney Neighbourhood Plan, 9 are suitable for development over the Plan period, in combination providing a total of 70 new homes.

¹ Paragraph: 003 Reference ID: 3-003-20140306

2. The sites deemed suitable for development within the constraints identified by this report are:

**STNP1 (10 dwellings);
STNP2 (4 dwellings);
STNP4 (17 dwellings);
STNP7 (8 dwellings);
STNP9 (3 dwellings);
STNP13 (5 dwellings);
STNP14 (5 dwellings);
STNP15 (6 dwellings);
STNP16 (12 dwellings);**

3. The following sites are deemed unsuitable for development within the constraints identified by this report:

STNP3; STNP5; STNP6; STNP8; STNP10; STNP11 and STNP12

2.0 OBJECTIVES

The objectives of this report are as follows:

- a) To set the minimum level of residential housing development to be achieved by site allocations in Saham Toney up till 2036;
- b) To analytically review and further consider the results of independent site assessments by AECOM (see the Saham Toney Neighbourhood Plan Site Assessment Report) and the Local Highways Authority, the Lead Local Flood Authority and Anglian Water (as described in Part One of this document);
- c) To establish which sites are potentially suitable for allocation in the Neighbourhood Plan;
- d) To specify sites to be allocated in the Neighbourhood Plan to meet as a minimum the defined level of housing development.



PART ONE: THE SELECTION OF SITES FOR ALLOCATION IN THE REGULATION 14 PRE-SUBMISSION OF THE NEIGHBOURHOOD PLAN

3.0 INTRODUCTION TO PART ONE

3.1 Saham Toney Parish Council intends to allocate residential housing sites in its Neighbourhood Plan, to a level not less than the minimum total specified in the Breckland Local Plan². The process of doing that consists of three main stages:

- 1) Identify potential sites;
- 2) Assess the sites put forward;
- 3) Select sites for allocation.

3.2 Stage 1 was carried out in two ways:

- a) The Parish Council published a Call for Sites that ran from 17 August to 18 October 2018. This was publicised on the Parish Council and Neighbourhood Plan websites, in the Parish magazine, on posters around the village, and by email to local landowners, developers, land agents and local and national house builders;
- b) Breckland Council also publicised the Call for Sites on its website and contacted all landowners who had put forward sites for the Breckland Strategic Housing Land Availability Assessments of 2014 and 2015 to inform them of the Parish Call for Sites.

3.3 The Call for Sites identified 16 potential sites, as summarised in Table 1A, with the site locations shown in Figure 1. Fuller details submitted for each site are given in Appendix A.

Site ID	Site Location	Site Area (ha)	Number of dwellings suggested by site proposer
STNP1	Grange Farm Piggeries, Chequers Lane	0.98	10
STNP2	The Croft Piggery, 69, Hills Road	0.5	4
STNP3	Junction of Hills Road and Ploughboy Lane	0.246	4
STNP4	Junction of Pound Hill and Page's Lane	0.813	12-15
STNP5	Pound Hill East	1.014	12-15
STNP6	Page's Lane east, near Pound Hill junction	0.46	5-6
STNP7	Page's Lane Farm	1.86	30-35
STNP8	Hills Road south, opposite Dolphin Crescent	2.59	40-50
STNP9	Ovington Road	0.445	3
STNP10	Behind 129 & 131 Hills Road	1.6	20
STNP11	8 Richmond Road (option 1)	0.15	2

² 33 new dwellings, as set out in Policy HOU 04 and Appendix 5 of the Local Plan

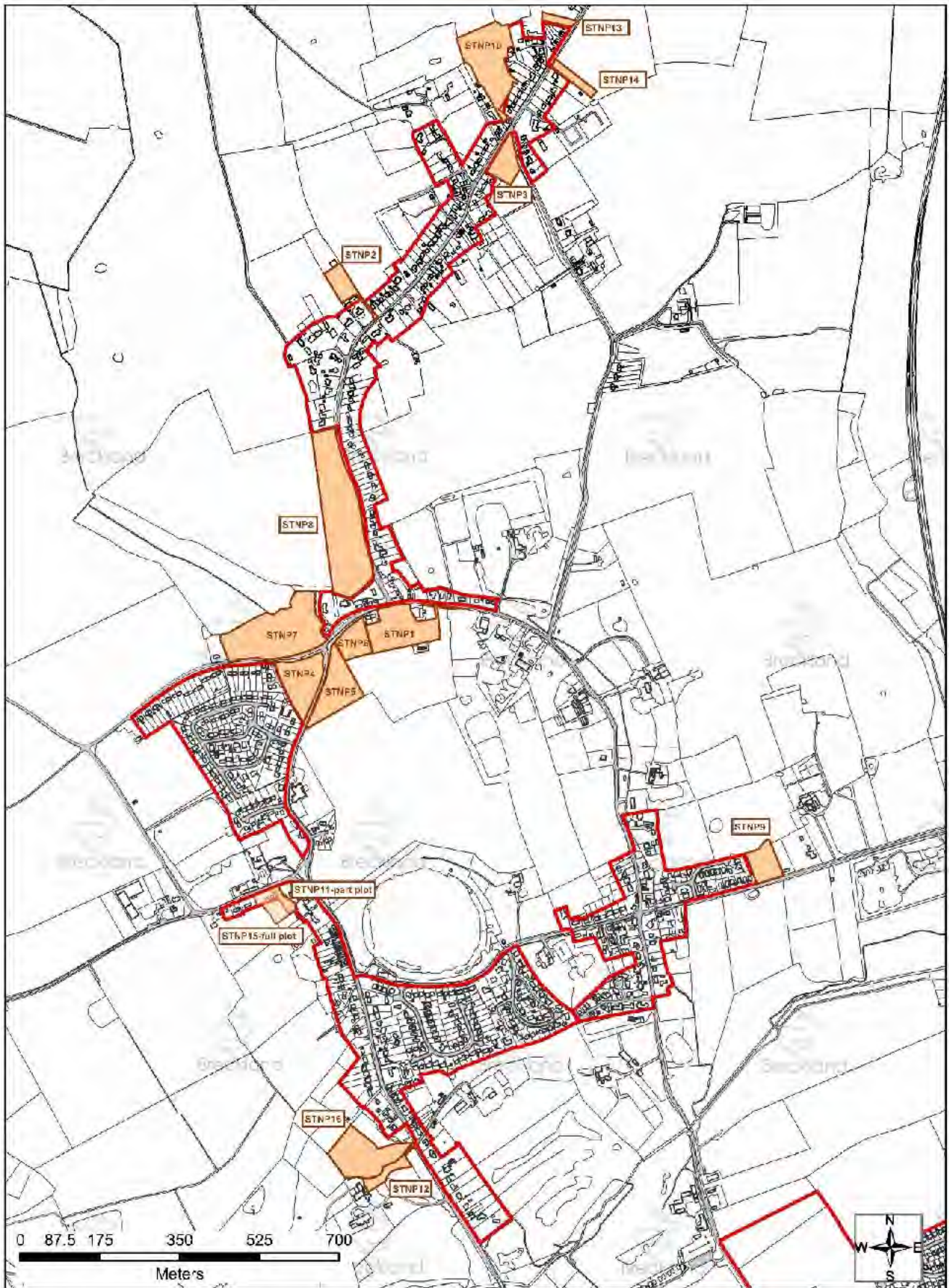
STNP12	Richmond Hall (option 1)	0.24	5
STNP13	Hill Farm, Hills Road	0.2	4-5
STNP14	Croft field, Hills Road	0.3	5
STNP15	8 Richmond Road (option 2)	0.4	4-8
STNP16	Richmond Hall (option 2)	3.48	Up to 35

Table 1A: Summary Details of Sites Proposed by the Call for Sites

3.4 At some stages of the pre-submission selection process the numbers of houses for certain sites were adjusted from those proposed by the site owners and used in the four independent site assessments. Part One of this report gives full details of those adjustments and why they were made, but for clarity and to act as a “road map” of the evolution of housing numbers at various stages of the process up to the pre-submission of the Neighbourhood Plan, the basic facts and figures are given in Table 1B.

Site	Number of Houses				
	Proposed and assessed	After mitigation of constraints	After discussion with owners	Subsequent owner proposals	Pre-Submission allocation
STNP1	10	6	10		10
STNP2	4	4	4		4
STNP3	4	Key constraint not mitigated			0
STNP4	12-15	10	13	18	13
STNP5	12-15	4	12	22	12
STNP6	5-6	5	5	10	5
STNP7	30-35	6	8	12	8
STNP8	40-50	Key constraints not mitigated			0
STNP9	3	3	3		3
STNP10	20	Key constraints not mitigated			0
STNP11	2	2	Option not selected		0
STNP12	5	5	Option not selected		0
STNP13	4-5	5	5		5
STNP14	5	5	5		5
STNP15	4-8	4	6		6
STNP16	Up to 35	17	12		12
TOTAL	222 (max)	76	83		83

Table 1B: Evolution of Housing Numbers During the Pre-Submission Site Selection Process



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Fig. 1: Location of Proposed Sites

3.5 All those who put forward sites suggested the number of dwellings that might be developed, should their site be selected for allocation. As shown in Table 1B, the potential total number of dwellings that might be delivered if all sites were to be allocated was between 180 and 222.

3.6 Stage 2 commenced in November 2018, when under a Locality technical support grant, AECOM was commissioned to carry out an independent assessment of all sites identified by the Call for Sites. Its report was completed on 25 April 2019 and approved by Locality on 17 June 2019. The assessment was based on desk study, supplemented by site visits undertaken on a single day. The AECOM site assessment report³ is presented separately as part of the evidence base for the Neighbourhood Plan.

3.7 The AECOM assessment identified that 3 sites were potentially suitable for development; 3 were not suitable for development unless significant constraints were overcome; and the remaining 10 were potentially suitable for development subject to mitigation of various less significant constraints.

3.8 The AECOM assessment identified another two potential sites that were available for allocation as a result of undecided planning applications at the time of report preparation:

- Meadow Farm, Chequers Lane: 3 dwellings on a site of 0.47 ha (ref. application 3PL/2019/0011/F);
- Nilefields, Swaffham Road: 54 dwellings on a site of 5.4 ha (ref. application 3PL/2019/0010/F).

Those sites were also assessed, albeit only by desk study, and are included in the AECOM report. The report concluded that both of those sites were not suitable for development unless significant constraints were overcome.

3.9 In addition, for the sixteen sites identified by the Call for Sites, the three agencies listed below carried out site assessments relating specifically to their areas of expertise:

- a) The Local Highways Authority (Norfolk County Council);
- b) Anglian Water;
- c) The Lead Local Flood Authority (Norfolk County Council).

The assessments each provided can be found in sections 7.4, 7.5 and 7.6 respectively.

3.10 The process for stage 3 (select sites for allocation) and its results and conclusions are the main subject of this report and can be found in section 5 onwards.

4.0 OVERALL HOUSING ALLOCATION

4.1 In order to make decisions on the allocation of sites, it is first necessary to establish the context in which decisions are to be made. As noted earlier, as suggested by the site proposers, the sixteen sites shown in Table 1B had the potential to deliver 222 new dwellings. That total was increased to 279 by the addition of the two undecided planning applications noted in 3.8.

4.2 Policy HOU 04 'Villages with Boundaries' of the Breckland Local Plan, (with Appendix 5 of that plan), allows for appropriate development outside but immediately adjacent to existing settlement boundaries of 'Villages with Boundaries' so long as the overall number of dwellings in the village does not significantly exceed 5% of the total number of homes in the settlement as at the time the Local Plan was

³ Saham Toney Neighbourhood Plan Site Assessment Report, AECOM, June 2019

adopted (November 2019). Appendix 4 to the Local Plan clarifies that a 5% increase for Saham Toney would be an additional 33 homes.

4.3 Policy HOU 04 provides a ball-park figure for growth in Saham Toney of a minimum of 33 homes. The 5% increase specified in Policy HOU 04 is not a percentage increase informed by site specific circumstances in Saham Toney. In practice planning applications will be determined on a site by site basis and assessed against a range of other policies in the Local Plan. The Saham Toney Neighbourhood Plan seeks to add value to this Local Plan context by planning in a more certain way for the growth that is appropriate to take place in Saham Toney.

4.4 An important starting point is an evaluation of the minimum number of 33 which is described as a housing target for Saham Toney in Appendix 5 to the Local Plan. There are two effects which would indicate a need to increase this minimum figure:

4.4.1 An increased household projection for the Breckland District via projections published by the Government in September 2018, accounted for as follows:

- a) The dwellings anticipated to be delivered through Policy HOU 04 of the Local Plan are part of Breckland Council's overall "Objectively Assessed Need" (OAN) of 15298 dwellings. That is derived from a previous Government household projection estimate, published in 2016 and based on 2014 data, which showed there would be 67,797 dwellings in the district in 2036. The latest projection estimate, published in September 2018 and based on 2016 data, showed an increase in that total to 68,588 dwellings. Using the later estimate the projected increase over the period of the Local Plan (2011-2036) has risen from 13,053 to 14,066.
- b) Applying adjustments to the new figure in the same way as done in the Central Norfolk Strategic Housing Market Assessment 2017, Breckland's full OAN would now be 16,311. Based on the previous OAN of 15,298, Policy HOU 02 of the Local Plan, which allocates a total of 16,630 new dwellings, shows an 8.7% buffer against the OAN. Measured against a potentially increased OAN, the buffer is reduced to 1.9%. It can reasonably be assumed that were the increased OAN to be applied, the buffer should not be less than it is for the present OAN. Applying an 8.7% buffer to a potentially revised OAN of 16,311 results in a total allocation across the district of 17,730. To be conservative it is proposed that a 10% buffer should be applied, as being more in accord with planning guidance. Applying that buffer results in a total allocation across the district of 17,942.
- c) A simple, but reasonable way to determine how this might affect Saham Toney's minimum expectation of growth is to make a pro-rata increase. Hence a revised minimum allocation is: $(33 \times 17942) / 16630 = 35.6$; set at 36.

4.4.2 The application of an adjustment factor of approximately 1.33 to reflect the disparity between average salaries and average house prices in the Breckland District (the affordability factor set by Planning Practice Guidance), as calculated below:

- a) Government Planning Practice Guidance, as updated in February 2019, sets out an adjustment factor to be applied to household projections to account for market signals. Due to the timing of the Local Plan's submission for examination, that Plan was covered by transition arrangements for the application of revised NPPF requirements and was thus not required to apply the adjustment. However, when the Local Plan is subsequently updated (planned for 2021), it will be required to do so.

- b) The Neighbourhood Plan is not covered by the same transition arrangements, and hence it is prudent to apply the adjustment from the outset.
- c) The potentially amended Breckland household projection 2011-2036 = 16,311 (as set out in point 4.4.1 (b)).
- d) The adjustment factor = $1 + \{[(\text{Local affordability ratio} - 4) \div 4] \times 0.25\}$
- e) The median local affordability ratio for Breckland is 9.17 (source: Office for National Statistics online dataset "Ratio of House Price to Workplace Based Earnings", March 2019), resulting in an adjustment factor of 1.323.
- f) Applying this increase to the result obtained from consideration of updated household projections gives a revised minimum housing allocation: $36 \times 1.323 = 47.63$; set at 48.

4.5 Hence, providing sites are shown to be suitable for development by the selection process, the aim is to allocate sites capable of delivering no less than 48 dwellings.

5.0 STATUS OF POTENTIAL SITES FOLLOWING INDEPENDENT ASSESSMENT

5.1 The findings of the four independent site assessments outlined in section 3 are summarised in Tables 2A and 2B.

	AECOM																					LHA				ANGLIAN WATER							LLFA			
CONSTRAINT	Land type	Location relative to settlement boundary	Highway access	Accessibility	Environmental designations	Ecology value	Landscape sensitivity	Agricultural land loss	Heritage impact	Location	TPO's on site	Impact on habitats and biodiversity	Public right of way	Social or community value	Ground contamination	Infrastructure crossing site	Utility access	Coalescence with neighbouring towns	Size & character of development	Amenity	AECOM OVERALL RATING		Access	Highway Network	Footpaths to school		Assets affected	Resource	Supply network	Water recycling centre capacity	Used water network capacity	Overall RAG rating		Would constraints prevent development?	Level of constraint	
STNP1	M																																			
STNP2	B																																			
STNP3	G																																			
STNP4	G																																			
STNP5	G																																			
STNP6	G																																			
STNP7	M																																			
STNP8	G																																			
STNP9	G																																			
STNP10	G																																			
STNP11	B																																			
STNP12	G																																			
STNP13	G																																			
STNP14	G																																			
STNP15	B																																			
STNP16	M																																			
Meadow Farm	G																																			
Nilefields	G																																			

Table 2A: Independent Site Assessment Findings

Site ID	AECOM	Local Highways Authority	Lead Local Flood Authority	Anglian Water
STNP1	May be suitable	Access constraint		For all sites: Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required
STNP2	May be suitable	Network and access constraints; no footpath to school		
STNP3	May be suitable	Network constraint; no footpath to school		
STNP4	May be suitable	Suitable (note ii)		
STNP5	May be suitable	Suitable (note ii)		
STNP6	May be suitable	Suitable (notes ii and iii)		
STNP7	May be suitable	Suitable (notes ii and iv)		
STNP8	May be suitable	Substandard road / junction constraints		
STNP9	Suitable	Network constraint		
STNP10	Not suitable	Network constraint; no footpath to school		
STNP11	Not suitable	Access constraint		
STNP12	May be suitable	Access constraint; no footpath to school		
STNP13	Suitable	Network constraint; no footpath to school		
STNP14	Suitable	Network constraint; no footpath to school		
STNP15	Not suitable	Access constraint		
STNP16	May be suitable	Access constraint; no footpath		
Meadow Farm	Not suitable	Not assessed (see note i)	Not assessed (see note i)	Not assessed (see note i)
Nilefields	Not suitable	Not assessed (see note i)	Not assessed (see note i)	Not assessed (see note i)

Table 2B: Summary of Independent Assessment Conclusions

Notes to Table 2B:

i) The Meadow Farm and Nilefields sites were assessed by AECOM on the basis of them being undecided planning applications at the time of their assessment. Since they were not put forward via the Call for Sites, they were not assessed by the other three agencies, who completed their reviews prior to AECOM identifying those sites.

ii) Highways would only support one of these 4 sites coming forward with a maximum of 25 dwellings to avoid more traffic using the Pound Hill/ Richmond Road junction.

iii) In addition to note (ii), the Local Highway Authority has advised that the site would only be acceptable if sufficient visibility could be achieved at the junction with a sufficient distance from Pound Hill Lane or through site STNP 5.

iv) In addition to note (ii), the Local Highway Authority has advised that it would be necessary to widen Pages Lane to 6m and provide a frontage footpath.

6.0 PROCESS OF SITE SELECTION

A three-stage process was adopted to select sites for allocation in the pre-submission version of the Neighbourhood Plan, as follows, and as illustrated by the flowchart given in Figure 2:

- 1) In order to be considered for site selection, each site was examined to establish if the constraints identified by the four independent assessments could be removed or mitigated. Sites for which such removal or mitigation was shown to be justified were included on a shortlist of sites for selection. Details of the pre-submission constraint conditioning⁴ undertaken are given in section 7 with a summary of the conclusions in section 8;
- 2) Each site for which constraint conditioning allowed it to be considered potentially suitable for allocation at the pre-submission stage was then reviewed against the relevant policies of the Breckland Local Plan (and its relevant sustainability objectives) and the emerging Saham Toney Neighbourhood Plan, in an overall conformance check. In some cases, conditioning resulted in a reduction in site size and / or delivery target. See sections 7 and 8 for details. The review involved weighting the various policy criteria, then rating each site against each criterion in a uniform and analytical manner;
- 3) The sites were then ranked by rating score and it was established how many of the best sites were needed to deliver the minimum allocation target of 48. Once this was done any other site that scored positively, showing it to be sustainable, was added to the selection list, on the basis that it was unreasonable to exclude sustainable sites, given that the target of 48 houses is a minimum, not a maximum, and is not based on a rigorous examination of sustainability.
- 4) For the two cases where options were put forward by landowners (STNP11/15 and STNP12/16), in each case the best ranked site of the two options was selected. At no stage of the process was the allocation of both options considered or assessed in either case.

⁴ Constraint conditioning is defined as a review of constraints to establish if they may be mitigated by existing evidence, or by appropriate measures included as conditions to an allocation policy.

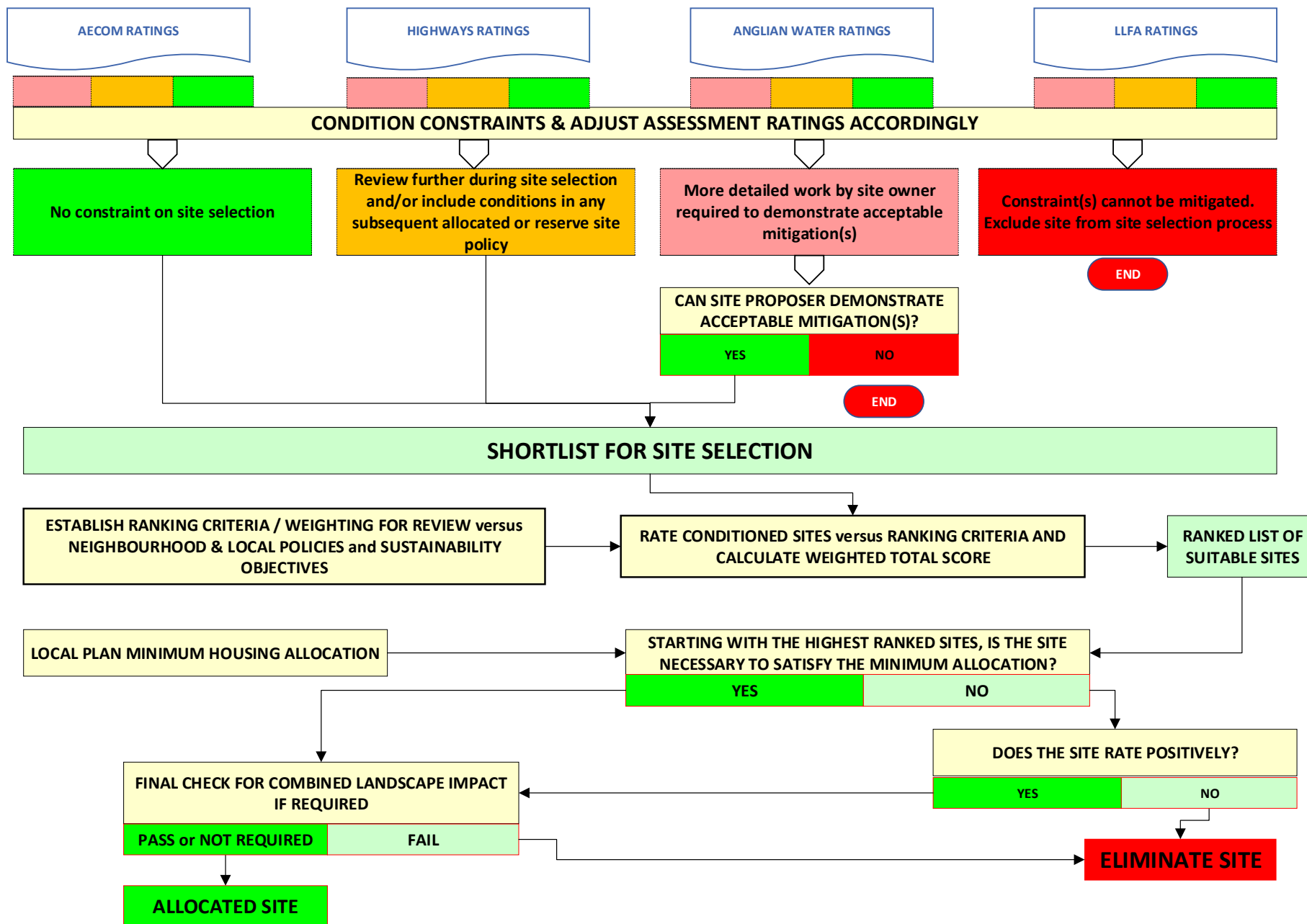


Fig. 2: Site Selection Process Flowchart

7.0 SITE CONSTRAINT CONDITIONING

7.1 Constraints identified by the four independent site assessments were based almost entirely on desk study and other than the AECOM assessment, were carried out over a limited period of time. Hence while the constraints are valid with respect to the information that was available in the public domain at the time of the assessments, it is a justified and appropriate exercise to establish which constraints may be mitigated, if any. Such mitigations may be identified via relevant information that was not available to the site assessors, by new material put forward by site proposers, or they may take the form of agreed conditions to a site allocation policy, should a site be allocated. The objective of this conditioning exercise is to establish which sites may go forward to the pre-submission site selection stage as potentially suitable for allocation, and which, if any, should be excluded from that process.

7.2 Tables 2A and 2B show that final conclusions on site allocations cannot be reached on the basis of the four site assessments alone, because each site has at least one constraint that would require mitigation before it could be considered suitable for allocation. Given this fact, prior to undertaking the process of site selection, the results of all four independent assessments will be conditioned to establish:

- 1) Which, if any, sites should be excluded from the site selection process, on the basis of having one or more significant constraints that could not be mitigated;
- 2) Which, if any, sites should only go forward to the site selection process if they were reduced in size;
- 3) Which, if any sites, have constraints that do not preclude the site being included in the site selection process, but for which the constraint(s) needs to be taken into account when rating the relative merits of each site; and
- 4) Which, if any sites, have constraints that would not influence the process of site selection, but which would need to be addressed by criteria in any site allocation policy for the site, should it be selected.

7.3 AECOM constraints

7.3.1 Greenfield / brownfield designations

In this respect, there are some anomalies in the AECOM assessments that require correction:

- a) STNP11 is classified as brownfield, but is entirely an undeveloped private garden, and so is reclassified as greenfield, in a similar way to STNP12, STNP13 and the Meadow Farm site;
- b) STNP15 is classified as brownfield, but is primarily an undeveloped private garden, with a residential dwelling to be demolished. Hence it is reclassified as mixture, in a similar way to STNP1, STNP7 and STNP16.

7.3.2 Location relative to the settlement boundary

The assessment confirms that most sites are partly within or immediately adjacent to the settlement boundary, and on that basis, those are suitable to progress to the site selection stage. The exceptions are:

- a) STNP5: AECOM classify this site as outside the settlement boundary. In fact, at both its northern and southern ends the site is separated from the settlement boundary only by the width of a road. Breckland Council Policy officers have previously advised that this may be considered “immediately adjacent to the settlement boundary”, and therefore the site is compliant with

Policy HOU 04 of the emerging Local Plan. **Conclusion: Site is suitable to progress to the site selection stage in this respect.**

- b) STNP16: Although the AECOM assessment states this site adjoins the settlement boundary at its access point, it caveats that by noting it is “largely unrelated to the settlement boundary”. That notwithstanding the site is nevertheless immediately adjacent to the settlement boundary and thus is compliant with Policy HOU 04 of the emerging Local Plan. **Conclusion: Site is suitable to progress to the site selection stage in this respect.**
- c) Meadow Farm: This site is noted as “significantly removed” from the settlement boundary and therefore non-compliant with Policy HOU 04 of the emerging Local Plan. This constraint cannot be mitigated. **Conclusion: On the basis of this constraint the site is excluded from the site selection process.**
- d) Nilefields: The AECOM assessment notes this site as being adjacent to the Watton settlement boundary. However, this site allocation process deals with sites in Saham Toney and this site is remote from the Saham Toney settlement boundary. The Watton boundary is irrelevant. Furthermore, even were it considered relevant, the Local Plan does not permit development outside the settlement boundary in market towns such as Watton. This constraint cannot be mitigated. **Conclusion: On the basis of this constraint the site is excluded from the site selection process.**

7.3.3 Highway Access

The AECOM site assessment report identifies varying degrees of constraints relating to highways access for the sites. These are detailed in Table 3 below, alongside notes on how any constraints may be appropriately mitigated.

SITE NAME	LEVEL OF AECOM CONSTRAINT (HIGHWAY ACCESS)	CONSTRAINT REVIEW / MITIGATION NOTES
STNP1	Suitable access could be provided in line with indicative site layout proposed	This constraint has been conditioned by the information in Appendix B1. Conclusion: Constraint mitigated for the site to be considered for site selection. The Local Highway Authority's conditions to withdrawn application 3PL/2015/1430/F to be criteria in any site allocation policy for site.
STNP2	Unsuitable at present but likely to be able to be upgraded to be suitable	A proposal to improve highway access submitted under withdrawn planning application 3PL/2015/0009/F was accepted by the Local Highway Authority in its response. Both are given in Appendix B2. Conclusion: Constraint mitigated for the site to be considered for site selection. The proposed highway access upgrade proposal to be a criterion in any site allocation policy for the site
STNP3	Suitable access could be provided onto Hills Road	Conclusion: No further mitigation required for the site to be considered for site selection
STNP4	Suitable access could be provided onto Pound Hill or Page's Lane	Conclusion: No further mitigation required for the site to be considered for site selection
STNP5	Suitable access could be provided onto Pound Hill	Conclusion: No further mitigation required for the site to be considered for site selection

STNP6	Suitable access could be provided onto Pound Hill	Conclusion: No further mitigation required for the site to be considered for site selection
STNP7	Upgrade of existing access onto Page's Lane likely to be possible	Conclusion: No further mitigation required for the site to be considered for site selection
STNP8	Existing farm vehicle access from Hills Road would require upgrading	Existing access is simply a farm track off the narrow Hills Road, so it is unproven that would be suitable for upgrade to serve a 50-dwelling site. Conclusion: Site proposer would have to demonstrate a feasible scheme for highway access prior to any selection of this site for allocation
STNP9	Upgrade of existing informal access from Ovington Road likely to be achievable	Indicative site layout plan provided by site proposer shows two driveway access points that are clearly feasible. See Appendix B3. Conclusion: Constraint mitigated. Proposed access provision to form part of any allocation policy for this site
STNP10	Existing access to the site is unsuitable for the intended use because it is narrow, and visibility is constrained by existing dwellings	The existing access is unpaved and not proven for vehicle access. Conclusion: Site proposer would have to demonstrate a feasible scheme for highway access prior to any selection of this site for allocation
STNP11	Existing access to the site is unsuitable for the intended use because it is narrow, visibility is constrained by existing dwellings and it is close to a sharp turn in Richmond Road	Existing access is a driveway for a single dwelling. Conclusion: Site proposer would have to demonstrate a feasible scheme for highway access prior to any selection of this site for allocation
STNP12	Upgrade of existing access likely to be achievable	Conclusion: No further mitigation required for the site to be considered for site selection
STNP13	No existing access, but suitable provision could be made from Hills Road	Conclusion: No further mitigation required for the site to be considered for site selection
STNP14	No existing access, but suitable provision could be made from Hills Road	Conclusion: No further mitigation required for the site to be considered for site selection
STNP15	Existing access to the site is unsuitable for the intended use because it is narrow, visibility is	Existing access is a driveway for a single dwelling. Conclusion: Site proposer would have to demonstrate a feasible scheme for highway access prior to any selection of this site for allocation

	constrained by existing dwellings and it is close to a sharp turn in Richmond Road	
STNP16	Upgrade of existing access likely to be achievable	Conclusion: No further mitigation required for the site to be considered for site selection
MEADOW FARM	No existing access, but suitable provision could likely be made (from Chequers Lane)	An acceptable indicative access scheme is set out in the planning application for this site. Conclusion: No further mitigation required for the purposes of site selection
NILEFIELDS	Fundamental concerns	The access scheme in the planning application has been opposed by the Local Highway Authority. Conclusion: Site proposer would have to demonstrate a feasible scheme for highway access prior to any selection of this site for allocation

Table 3: Conditioning of Highway Access Constraints

7.3.4 Accessibility

The AECOM site assessment report identifies varying degrees of constraints relating to pedestrian access to the sites. These are detailed in Table 4 below, alongside notes on how any constraints may be appropriately mitigated.

SITE NAME	LEVEL OF AECOM CONSTRAINT (PEDESTRIAN ACCESS)	CONSTRAINT REVIEW / MITIGATION NOTES
STNP1	No pedestrian pavement along Chequer's Lane or Page's Lane	The indicative site layout given in Appendix B1 shows a pedestrian footpath passing through the site to link with the existing one on Page's Lane, which can be seen to be a feasible and practical solution. Conclusion: Constraint mitigated for the purposes of site selection. Provision of a footpath linking to Page's Lane to be a condition of any site allocation or reserve site policy for this site.
STNP2	No pedestrian pavement along Hills Road	See review and conditioning of local highway authority constraints in section 7.4.5
STNP3	No pedestrian pavement	See review and conditioning of local highway authority constraints in section 7.4.5
STNP4	Existing pedestrian access	Conclusion: No mitigation required for the site to be considered for site selection
STNP5	Existing pedestrian access	Conclusion: No mitigation required for the site to be considered for site selection
STNP6	Existing pedestrian access	Conclusion: No mitigation required for the site to be considered for site selection
STNP7	Pedestrian access	The access noted by AECOM is actually on the opposite side of Page's Lane. Given the proposed site size it would be expected that a paved footpath would be required along the site frontage. Conclusion: Provision of a paved footpath

		would be a condition of any site allocation policy for this site
STNP8	No pedestrian access	The proposed site size is likely to generate a significant amount of foot traffic along the Hills Road, which is narrow and lacks a footpath, and so would be unacceptable. Site proposer would have to demonstrate a feasible scheme for paved footpath access prior to any selection of this site for allocation
STNP9	No pedestrian pavement	The site proposer has agreed a with the Local Highway Authority that a pedestrian pavement would be provided along the front of the site. See indicative drawing in Appendix B3. Conclusion: No further mitigation required for the purposes of site selection. Include the footpath provision as a criterion of any site allocation policy for this site
STNP10	No pedestrian pavement	See review of local highway authority constraints in section 7.4.5. Site proposer would have to demonstrate a feasible scheme for paved footpath access prior to any selection of this site for allocation
STNP11	Existing pedestrian access	Conclusion: No mitigation required for the site to be considered for site selection
STNP12	Pedestrian access	The AECOM conclusion is based on a new pavement being provided to the site under planning approval for 3PL/2018/0563/O, but that development may not go ahead if this site is allocated. Conclusion: No further mitigation required for the site to be considered for site selection. Include the footpath condition of 3PL/2018/0563/O as a criterion of any site allocation policy for this site
STNP13	No pedestrian pavement	See review of local highway authority constraints in section 7.4.5 Conclusion: The provision of acceptable highway widening and passing place measures will be policy criteria if this site is selected as an allocated site
STNP14	No pedestrian pavement	See review of local highway authority constraints in section 7.4.5 Conclusion: The provision of acceptable highway widening and passing place measures will be policy criteria if this site is selected as an allocated site
STNP15	Existing pedestrian access	Conclusion: No mitigation required for the site to be considered for site selection
STNP16	Pedestrian access	The AECOM conclusion is based on a new pavement being provided to the site under planning approval for 3PL/2018/0563/O, but that development may not go ahead if this site is allocated. Conclusion: No further mitigation required for the site to be considered for site selection. Include the footpath condition of 3PL/2018/0563/O as a criterion of any site allocation policy for this site
MEADOW FARM	No pedestrian access	The site is approximately 450m from the nearest paved footpath and so within cycling access of village facilities. The Local Highway Authority's comments to the planning application note that the extra walking journeys that would be generated are not sufficient to justify provision of a

		pavement. Conclusion: No further mitigation required for the purposes of site selection
NILEFIELDS	Fundamental concerns	Since the only pedestrian access is on the opposite side of the highway at an unsafe crossing point a new pavement would be required linking to that further south on Swaffham Road. Conclusion: Site proposer would have to demonstrate a feasible scheme for pedestrian access prior to any selection of this site for allocation

Table 4: Conditioning of Accessibility Constraints

7.3.5 Environmental designations

The AECOM assessment report identifies a potential environmental constraint that applies to every potential site, in that sites are in an SSSI Impact Risk Zone. In fact, this is true for the whole of the parish (reference Gov.UK Magic maps). This is not a constraint on individual developments, but rather a fact that must be taken into account in accordance with Breckland Council requirements for documentation to be submitted with planning applications. Other constraints identified by AECOM in respect to environmental designations are reviewed below in Table 5:

SITE NAME	LEVEL OF AECOM CONSTRAINT (ENVIRONMENTAL DESIGNATIONS)	CONSTRAINT REVIEW / MITIGATION NOTES
STNP1	Some impact, mitigation required	Conclusion: Mitigation of flood risk will be assessed as part of site selection and would be a condition of any site allocation policy for this site.
STNP2	Minimal, unlikely to require mitigation	Conclusion: No mitigation required for the site to be considered for site selection
STNP3	Some impact, mitigation required	Conclusion: Mitigation of flood risk will be assessed as part of site selection and would be a condition of any site allocation policy for this site.
STNP4	Some impact, mitigation required	Conclusion: Mitigation of flood risk will be assessed as part of site selection and if necessary, would be a condition of any site allocation policy for this site.
STNP5	Minimal impact, no mitigation required	Conclusion: No mitigation required for the site to be considered for site selection
STNP6	Minimal impact, no mitigation required	Conclusion: No mitigation required for the site to be considered for site selection
STNP7	Some impact, mitigation required	Conclusion: Mitigation of flood risk will be assessed as part of site selection and if necessary, would be a condition of any site allocation policy for this site.
STNP8	Minimal impact, no mitigation required	The AECOM assessment overlooks the existing problem of surface water run-off from the site which has in the past contributed to the flooding of properties immediately to the south of the site, most recently in June 2016. Conclusion: Mitigation of flood risk will be assessed as part of site selection and if necessary, would be a condition of any site allocation policy for this site.
STNP9	Some impact, mitigation required	Conclusion: Mitigation of flood risk will be assessed as part of site selection and would be a condition of any site allocation policy for this site.

STNP10	Some impact, mitigation required	Conclusion: Given the extent and level of flood risk (which is HIGH over much of the site area), site proposer would have to demonstrate a feasible scheme for mitigation of that risk prior to any selection of this site for allocation or
STNP11	Minimal impact, no mitigation required	Conclusion: No mitigation required for the site to be considered for site selection
STNP12	Minimal impact, no mitigation required	Conclusion: No mitigation required for the site to be considered for site selection
STNP13	Minimal impact, no mitigation required	Conclusion: No mitigation required for the site to be considered for site selection
STNP14	Minimal impact, no mitigation required	Conclusion: No mitigation required for the site to be considered for site selection
STNP15	Minimal impact, no mitigation required	Conclusion: No mitigation required for the site to be considered for site selection
STNP16	Minimal impact, no mitigation required	Conclusion: No mitigation required for the site to be considered for site selection
MEADOW FARM	Some impact, mitigation required	Conclusion: Mitigation of flood risk will be assessed as part of site selection and would be a condition of any site allocation policy for this site.
NILEFIELDS	Flood Zone 3 would reduce the developable area of the site. Flood mitigation and potential mitigation for the Special Protection Area is likely to be required	Much of this site is at high risk of fluvial and/or surface water flooding. The planning application has not adequately demonstrated that mitigation measures will be effective. Conclusion: Site proposer would have to demonstrate a feasible scheme for mitigation of flood risk prior to any selection of this site for allocation

Table 5: Conditioning of Environmental Designations Constraints

7.3.6 Ecology value. The AECOM assessment report identifies one potential constraint that applies to every potential site, which is the presence of priority species for Countryside Stewardship targeting. In this respect lapwings are identified for every site, and curlews for sites STNP4 and STNP7. Habitats for various species are also identified. However, the purpose of Countryside Stewardship is not to block development, but to offer funding for farmers, woodland owners, foresters and land managers to make environmental improvements. The AECOM assessment did not include any site-specific ecological surveys, and so is only an indication that priority species may be present on a site. Rather than preventing the selection of any particular site for allocation, this may be reasonably set aside for ecological submissions as part of the normal planning application process.

Constraints that are specific to individual sites are reviewed below.

SITE NAME	LEVEL OF AECOM CONSTRAINT (ECOLOGY)	CONSTRAINT REVIEW / MITIGATION NOTES
STNP1	Unknown	Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory ecological appraisal would be a condition of any site allocation policy for this site.
STNP2	Unknown	Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory

		ecological appraisal would be a condition of any site allocation policy for this site.
STNP3	Unknown, but may provide habitat for a number of species	Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory ecological appraisal would be a condition of any site allocation policy for this site.
STNP4	Unknown, but may provide habitats	Conclusion: No further action required with regard to site selection. The provision of a satisfactory ecological appraisal would be a condition of any site allocation policy for this site.
STNP5	Unknown, but may provide habitats	Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory ecological appraisal would be a condition of any site allocation policy for this site.
STNP6	Unknown, but may provide habitats	Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory ecological appraisal would be a condition of any site allocation policy for this site.
STNP7	Unknown, but may provide habitats	AECOM assessment highlights a need for mitigation of flood risk. Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory ecological appraisal and mitigation of flood risk would be conditions of any site allocation policy for this site.
STNP8	Unknown, but may provide habitats	Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory ecological appraisal would be a condition of any site allocation policy for this site.
STNP9	Potential value	Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory ecological appraisal would be a condition of any site allocation policy for this site.
STNP10	Unknown	Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory ecological appraisal would be a condition of any site allocation policy for this site.
STNP11	Unknown	Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory ecological appraisal would be a condition of any site allocation policy for this site.
STNP12	Unknown	Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory ecological appraisal would be a condition of any site allocation policy for this site.
STNP13	Unknown	Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory ecological appraisal would be a condition of any site allocation policy for this site.
STNP14	Unknown	Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory

		ecological appraisal would be a condition of any site allocation policy for this site.
STNP15	Unknown	Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory ecological appraisal would be a condition of any site allocation policy for this site.
STNP16	Potential value	Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory ecological appraisal would be a condition of any site allocation policy for this site.
MEADOW FARM	Some value	The AECOM assessment has taken the ecological appraisal submitted with the planning application as fact and so has not given this site the same level of assessment as others in respect of ecology value. Conclusion: Site selection dependent on planning application response from ecology specialists
NILEFIELDS	Potential value	The ecological appraisal submitted with the planning application is invalid. The AECOM assessment as taken that appraisal as fact, which it is not. Location within the Breckland SPA buffer for stone curlews indicates the site has special sensitivity. Conclusion: Provision of a satisfactory ecological appraisal by the site proposer would be required before this site could be considered for site selection

Table 6: Conditioning of Ecology Value Constraints

7.3.7 Landscape sensitivity

The three parts of the Saham Toney Parish Landscape Character Assessment, January 2019, provide the overall context for assessing each site in this respect. During the site selection process, the specifics of each site will be reviewed and taken into account because a site may differ from its area classification

SITE NAME	LEVEL OF AECOM CONSTRAINT (LANDSCAPE SENSITIVITY)	CONSTRAINT REVIEW / MITIGATION NOTES
STNP1	Medium to high sensitivity	The site is an area of moderate-high combined landscape sensitivity. Conclusion: No further action required with regard to being shortlisted for site selection, but will be further reviewed as part of that process. The provision of a satisfactory landscape and visual impact assessment would be a condition of any site allocation policy for this site
STNP2	Medium sensitivity	Conclusion: No further action required with regard to being shortlisted for site selection.
STNP3	Medium sensitivity	Conclusion: No further action required with regard to being shortlisted for site selection.
STNP4	High sensitivity	The site is an area of moderate-high combined landscape sensitivity. Conclusion: No further action required with regard being to being shortlisted for site selection, but will be further reviewed as part of that process. The provision of a satisfactory landscape and visual impact assessment

		would be a condition of any site allocation policy for this site
STNP5	High sensitivity	The site is an area of moderate-high combined landscape sensitivity. Conclusion: No further action required with regard being to being shortlisted for site selection, but will be further reviewed as part of that process. The provision of a satisfactory landscape and visual impact assessment would be a condition of any site allocation policy for this site
STNP6	High sensitivity	The site is an area of moderate-high combined landscape sensitivity. Conclusion: No further action required with regard being to being shortlisted for site selection, but will be further reviewed as part of that process. The provision of a satisfactory landscape and visual impact assessment would be a condition of any site allocation policy for this site
STNP7	High sensitivity	The site is an area of moderate-high combined landscape sensitivity. Conclusion: No further action required with regard being to being shortlisted for site selection, but will be further reviewed as part of that process. The provision of a satisfactory landscape and visual impact assessment would be a condition of any site allocation policy for this site
STNP8	Medium sensitivity	The site is in an area of moderate landscape and high visual sensitivity. It therefore has moderate-high combined sensitivity. Conclusion: No further action required with regard being to being shortlisted for site selection, but will be further reviewed as part of that process. The provision of a satisfactory landscape and visual impact assessment would be a condition of any site allocation policy for this site
STNP9	Medium sensitivity	Conclusion: No further action required with regard to being shortlisted for site selection.
STNP10	Medium sensitivity	Conclusion: No further action required with regard to being shortlisted for site selection.
STNP11	Medium sensitivity	Conclusion: No further action required with regard to being shortlisted for site selection.
STNP12	Medium sensitivity	The AECOM assessment notes the site is not indented into the edge of the village, which the Parish Landscape Character Assessment highlights as where development should be directed to in this this character area. Conclusion: No further action required with regard being to being shortlisted for site selection. This will be examined in more detail during the site selection process. The provision of a satisfactory landscape and visual impact assessment would be a condition of any site allocation policy for this site
STNP13	Medium sensitivity	Conclusion: No further action required with regard to being shortlisted for site selection.
STNP14	Medium sensitivity	Conclusion: No further action required with regard to being shortlisted for site selection.

STNP15	Medium sensitivity	Conclusion: No further action required with regard to being shortlisted for site selection.
STNP16	Medium sensitivity	The AECOM assessment notes the site is not indented into the edge of the village, which the Parish Landscape Character Assessment highlights as where development should be directed to in this character area. This could be achieved if the site were reduced in size from the maximum level proposed. Conclusion: No further action required with regard being to being shortlisted for site selection. In accordance with AECOM notes, acceptable screening of the site would be a condition of a site allocation policy if this site is selected. The provision of a satisfactory landscape and visual impact assessment would be a condition of any site allocation policy for this site
MEADOW FARM	Medium sensitivity	Conclusion: No further action required with regard to being shortlisted for site selection.
NILEFIELDS	High sensitivity	The site is an area of moderate-high combined landscape sensitivity. As pointed out by the AECOM assessment, the landscape character of the area in which the site is located is relatively uncommon and should be conserved for its special character and to maintain the separate identities of Watton and Saham Toney. Conclusion: A landscape and visual impact assessment has not been provided with the final planning application. Hence, since it has not been shown that impact on this high sensitivity area could be mitigated, the site is excluded from the site selection process

Table 7: Conditioning of Landscape Sensitivity Constraints

7.3.8 Agricultural land loss. Paragraph 170 of the National Planning Policy Framework (NPPF) requires that "Planning policies and decisions should contribute to and enhance the natural and local environment by ... recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land...". The glossary of the NPPF defines "Best and most versatile agricultural land" as land in grades 1, 2 and 3a of the agricultural land classification. Sub-grade 3a is described in the agricultural land classification thus: "Good quality agricultural land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and the less demanding horticultural crops." Sub-grade 3b is described as "moderate quality agricultural land capable of producing moderate yields of a narrow range of crops, principally cereals and grass or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year."

The AECOM assessment did not make this important distinction, which is reviewed below for each site.

SITE NAME	LEVEL OF AECOM CONSTRAINT (AGRICULTURAL LAND GRADING)	CONSTRAINT REVIEW / MITIGATION NOTES

STNP1	Some loss	The site is currently a pig farm including grass grazing land. As such it may be considered to fall into sub-grade 3b of the agricultural land classification, rather than sub-grade 3a. Given this the loss of the land would not contravene the NPPF. Conclusion: No further action required with regard to being shortlisted for site selection.
STNP2	Some loss	The site is a disused pig farm occupied by former farm buildings. As such it may be considered to fall into sub-grade 3b of the agricultural land classification. Conclusion: No further action required with regard to being shortlisted for site selection.
STNP3	Loss of good to moderate land	The assessment notes the land is Grade 3. However, the regular flooding of this site means it cannot be considered to be Grade 3a agricultural land. Conclusion: No further action required with regard to being shortlisted for site selection.
STNP4	Loss of good to moderate land	The assessment notes the land is Grade 3. The site comprises grazing land and so may be rated as Grade 3b, and therefore not “best and most valuable” land. Conclusion: No further action required with regard to being shortlisted for site selection.
STNP5	Loss of good to moderate land	The assessment notes the land is Grade 3. The site comprises grazing land and so may be rated as Grade 3b, and therefore not “best and most valuable” land. Conclusion: No further action required with regard to being shortlisted for site selection.
STNP6	Loss of good to moderate land	The assessment notes the land is Grade 3. The site comprises grazing land and so may be rated as Grade 3b, and therefore not “best and most valuable” land. Conclusion: No further action required with regard to being shortlisted for site selection.
STNP7	Loss of good to moderate land	The assessment notes the land is Grade 3. It is currently unused but adjacent farmland supports crop-growing, so this site should be considered Grade 3a land. Conclusion: Take the land classification into account when selecting sites, if this site progresses to that stage
STNP8	Loss of good to moderate land	The assessment notes the land is Grade 3. Since it produces sugar beet it should be deemed Grade 3a. Conclusion: Take the land classification into account when selecting sites, if this site progresses to that stage
STNP9	Loss of good to moderate land	The assessment notes the land is Grade 3. It is currently not used as agricultural land, but nearby fields are used for grazing rather than crop-growing, so the land may be considered to be Grade 3b. Conclusion: No further action required with regard to being shortlisted for site selection.
STNP10	Loss of good to moderate land	The assessment notes the land is Grade 3. The regular flooding of this site means it cannot be considered to be Grade 3a agricultural land. Conclusion: No further action required with regard to being shortlisted for site selection.
STNP11	No loss	Conclusion: No action required with regard to being shortlisted for site selection.

STNP12	No loss	Conclusion: No action required with regard to being shortlisted for site selection.
STNP13	No loss	Conclusion: No action required with regard to being shortlisted for site selection.
STNP14	Some loss	The assessment notes the land is Grade 3. Since it produces a cereal crop (barley) it should be deemed Grade 3a. Conclusion: Take the land classification into account when selecting sites, if this site progresses to that stage
STNP15	No loss	Conclusion: No action required with regard to being shortlisted for site selection.
STNP16	No loss	Conclusion: No action required with regard to being shortlisted for site selection.
MEADOW FARM	No loss	Conclusion: No action required with regard to being shortlisted for site selection.
NILEFIELDS	Some loss	The assessment notes the land is Grade 3. The site comprises grazing land and so may be rated as Grade 3b, and therefore not “best and most valuable” land. Conclusion: No further action required with regard to being shortlisted for site selection.

Table 8: Conditioning of Agricultural land Loss Constraints

7.3.9 Heritage impact

SITE NAME	LEVEL OF AECOM CONSTRAINT (HERITAGE)	CONSTRAINT REVIEW / MITIGATION NOTES
STNP1	No impact	Conclusion: No action required with regard to being shortlisted for site selection.
STNP2	No impact	Conclusion: No action required with regard to being shortlisted for site selection.
STNP3	No impact	Conclusion: No action required with regard to being shortlisted for site selection.
STNP4	Minimal impact and minimal need for mitigation	Possible impact relates to Page’s Place (Gr. II listed) 150m north of the site. Conclusion: Take the possible heritage impact into account when selecting sites, if this site progresses to that stage
STNP5	No impact	Conclusion: No action required with regard to being shortlisted for site selection.
STNP6	Mitigation may be required	Possible mitigation relates to Page’s Place (Gr. II listed) approximately 50m to the north of the site. Conclusion: Take the possible heritage impact into account when selecting sites, if this site progresses to that stage
STNP7	Mitigation may be required	Possible mitigation relates to Page’s Place (Gr. II listed) adjacent to the site. Conclusion: Take the possible heritage impact into account when selecting sites, if this site progresses to that stage
STNP8	Mitigation may be required	Possible mitigation relates to Page’s Place (Gr. II listed) approximately 40m to the south of the site. Conclusion: Take the possible heritage impact into account when selecting sites, if this site progresses to that stage

STNP9	Mitigation may be required	Possible mitigation relates to Brick Kiln Farmhouse (Gr. II listed) approximately 120m from the site. Conclusion: Take the possible heritage impact into account when selecting sites, if this site progresses to that stage
STNP10	No impact	Conclusion: No action required with regard to being shortlisted for site selection.
STNP11	Mitigation may be required	Possible mitigation relates to The Old Rectory (Gr. II listed) and St. George's Church (Gr. I listed) opposite the site. Conclusion: Take the possible heritage impact into account when selecting sites, if this site progresses to that stage
STNP12	No impact	Conclusion: No action required with regard to being shortlisted for site selection.
STNP13	No impact	Conclusion: No action required with regard to being shortlisted for site selection.
STNP14	No impact	Conclusion: No action required with regard to being shortlisted for site selection.
STNP15	Mitigation may be required	Possible mitigation relates to The Old Rectory (Gr. II listed) and St. George's Church (Gr. I listed) opposite the site. Conclusion: Take the possible heritage impact into account when selecting sites, if this site progresses to that stage
STNP16	No impact	Conclusion: No action required with regard to being shortlisted for site selection.
MEADOW FARM	Mitigation may be required	Meadow Farmhouse, a Grade II listed building is within 50m of the site. A Heritage Impact Statement (HIA) was submitted with the planning application for this site. Its conclusions regarding no impact on significance require confirmation by a Historic Buildings consultant for Breckland or Norfolk County Councils. Conclusion: Take account of expert responses to the HIA during site selection if this site progresses to that stage
NILEFIELDS	Unlikely to require mitigation	AECOM assessment note refers to a scheduled monument 650m from the site. Conclusion: No further action required with regard to site being shortlisted for site selection.

Table 9: Conditioning of Heritage Impact Constraints

7.3.10 Location

With one exception, all sites were deemed “poorly located” by the AECOM assessment. However, that conclusion overlooked the unavoidable truth that other than a primary school and some open spaces, there are none of the services or facilities which AECOM assessed in the whole Parish of Saham Toney. That alone cannot be seen as a reason not to allocate a site. The AECOM ratings took no account of distance to the primary school or open spaces. The exception was the Nilefields site, but the AECOM conclusion of “moderately located” contradicted its own notes that the site is 1200m from services, and it is downgraded to “poorly located” in accordance with AECOM’s own criteria. **Conclusion: A more rigorous review will be undertaken when rating and ranking sites that progress to the site selection stage.**

7.3.11 Tree Preservation Orders on Site

The existence of tree preservation orders is not a valid reason to exclude a potential site from allocation. Where such orders exist, should a site be selected as allocated or reserve, policy conditions will be applied to ensure appropriate measures are taken with regard to protected trees.

7.3.12 Impact on habitats and biodiversity

AECOM assessed every site as having either unknown or potential, but unspecified impact. In most case the assessment noted a requirement for further ecological surveys, as described below:

SITE NAME	LEVEL OF AECOM CONSTRAINT (HABITATS & BIODIVERSITY)	CONSTRAINT REVIEW / MITIGATION NOTES
STNP1	Unknown	AECOM assessment based on low ecological value. Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.
STNP2	Unknown	AECOM assessment notes potential impact as the site includes possible habitats for bats and protected bird species which would require further ecological surveys. Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.
STNP3	Unknown	AECOM assessment notes potential loss of habitats which would require further ecological surveys. Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.
STNP4	Unknown	AECOM assessment notes potential loss of habitats. Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.
STNP5	Unknown	AECOM assessment notes potential loss of habitats which would require further ecological surveys. Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.
STNP6	Unknown	While classing impact as “unknown” the AECOM assessment also notes potential loss of habitats which would therefore require further ecological surveys. Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.
STNP7	Unknown	AECOM highlighted potential impact to habitats. Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.

STNP8	Unknown	AECOM highlighted potential impact to habitats. Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.
STNP9	Unknown	While classing impact as “unknown” the AECOM assessment also notes potential loss of habitats which would therefore require further ecological surveys. Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.
STNP10	Unknown	AECOM highlighted potential impact to habitats. Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.
STNP11	Unknown	AECOM highlighted potential impact to habitats. Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.
STNP12	Unknown	AECOM highlighted potential impact to habitats. Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.
STNP13	Unknown	AECOM highlighted potential impact to habitats. Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.
STNP14	Unknown	AECOM highlighted potential impact to habitats. Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.
STNP15	Unknown	AECOM highlighted potential impact to habitats. Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.
STNP16	Potential impact, mitigation required	AECOM assessment based on previous planning applications on and around the site. Since an acceptable ecological appraisal was presented with planning application 3PL/2018/0563/O, it may be anticipated that the same would be true for this site. Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.
MEADOW FARM	Potential impact	Preliminary ecological appraisal submitted with planning application identified possible threats to great crested newts and bats. Conclusion: Provision of an acceptable final ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation policy for this site.
NILEFIELDS	Potential impact	This site is a valuable habitat and is species rich. Part of the site falls in the Breckland SPA buffer for stone curlews. This

		has not been addressed in the final planning application or the AECOM assessment. Conclusion: Provision of a satisfactory ecological appraisal by the site proposer would be required before this site could be considered for site selection
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Table 10: Conditioning of Impact on Habitats and Biodiversity Constraints

7.3.13 Public right of way

None of the sites were assessed to include public rights of way and hence none are constrained by this consideration and no further action is required.

7.3.14 Social or community value

Only one site, Nilefields, was assessed to have a constraint relating to social or community value, and is discussed below. For all other sites, no further action is required in respect of this constraint.

Nilefields serves as a livestock corral for the annual Wayland Show. **Conclusion: Before the site could be allocated, the land owners would have to demonstrate alternative arrangements would be made to the satisfaction of the Wayland Show organisers.**

7.3.15 Ground contamination

SITE NAME	LEVEL OF AECOM CONSTRAINT (GROUND CONTAMINATION)	CONSTRAINT REVIEW / MITIGATION NOTES
STNP1	Likely to be affected	The AECOM assessment reviews the fact that some of the existing buildings on site contain asbestos and that it is also likely that some areas of concrete hard standing are contaminated, and considers a preliminary contamination risk assessment that was submitted as part of a previous planning application for the site. It concludes that a full intrusive ground investigation should be carried out prior to development and a mitigation strategy prepared. Conclusion: No further action required with regard to site being shortlisted for site selection. Any site allocation policy shall include conditions requiring an updated contamination risk assessment, based on a full intrusive ground investigation, and setting out an acceptable mitigation strategy.
STNP2	Possible contamination from industrial use	Conclusion: No further action required with regard to site being shortlisted for site selection. Any site allocation policy shall include conditions requiring a contamination risk assessment, based on a full intrusive ground investigation, and setting out an acceptable mitigation strategy
STNP3	Not likely to be affected	Conclusion: No further action required with regard to site being considered for selection.
STNP4	Not likely to be affected	Conclusion: No further action required with regard to site being considered for selection.

STNP5	Current use not considered to result in any significant contamination	Conclusion: No further action required with regard to site being considered for selection.
STNP6	Not likely to be affected	Conclusion: No further action required with regard to site being considered for selection.
STNP7	Current use should not cause contamination	AECOM assessment overlooks the potential from agricultural fertiliser. Conclusion: No further action required with regard to site being shortlisted for site selection. Any site allocation policy shall include conditions requiring a contamination risk assessment, based on a full intrusive ground investigation, and setting out an acceptable mitigation strategy
STNP8	Current use should not cause contamination	AECOM assessment overlooks the potential from agricultural fertiliser. Conclusion: No further action required with regard to site selection. Any site allocation policy shall include conditions requiring a contamination risk assessment, based on a full intrusive ground investigation, and setting out an acceptable mitigation strategy
STNP9	Current use would not cause contamination	Conclusion: No further action required with regard to site being considered for selection.
STNP10	Current use would not cause contamination	Conclusion: No further action required with regard to site being considered for selection.
STNP11	Current use would not cause contamination	Conclusion: No further action required with regard to site being considered for selection.
STNP12	Current use would not cause contamination	Conclusion: No further action required with regard to site being considered for selection.
STNP13	Not likely to be affected	Conclusion: No further action required with regard to site selection.
STNP14	Potential from agricultural fertiliser	Conclusion: No further action required with regard to being considered for site selection. Any site allocation policy shall include conditions requiring a contamination risk assessment, based on a full intrusive ground investigation, and setting out an acceptable mitigation strategy
STNP15	Current use would not cause contamination	Conclusion: No further action required with regard to site being considered for selection.
STNP16	Current use would not cause contamination	Conclusion: No further action required with regard to site being considered for selection.
MEADOW FARM	Current use should not cause contamination	Conclusion: No further action required with regard to site being considered for selection.

NILEFIELDS	Current use should not cause contamination	Conclusion: No further action required with regard to site being considered for selection.
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Table 11: Conditioning of Ground Contamination Constraints

7.3.16 Infrastructure crossing site

The AECOM Assessment identified infrastructure constraints for every site. The AECOM assessment comments are given below. In all cases AECOM concluded the constraints were not significant and site development is unlikely to be affected by them. However, as also noted below AECOM overlooked public domain information regarding the Nilefields site: the Anglian Water response to the planning application; and that is also noted below. For all sites other than Nilefields: **Conclusion: No further action required with regard to being considered for site selection. Include appropriate mitigation requirements in any site allocation policy**

SITE NAME	LEVEL OF AECOM CONSTRAINT (INFRASTRUCTURE CROSSING SITE)	CONSTRAINT REVIEW / MITIGATION NOTES
STNP1	Site unlikely to be affected	As recommended by the AECOM assessment, it will be necessary to mitigate the powerline near the site entrance and overhead cables which cross the site. This does not prevent the site being rated suitable subject to that mitigation.
STNP2	Site unlikely to be affected	HV powerline running across the field. LV powerline located next to the entrance gate.
STNP3	Site unlikely to be affected	Power and telephone lines which would need to be mitigated or moved. Unlikely to be significant constraint.
STNP4	Site unlikely to be affected	HV powerline running along the boundary between the field and Pound Hill. The gas pipeline can possibly run through the field due to proximity of substation which requires further investigation. Neither likely to result in significant constraint
STNP5	Site unlikely to be affected	HV powerline running across the field. Proximity of substation may indicate potential gas pipelines which would need further investigation. Neither likely to result in significant constraint.
STNP6	Site unlikely to be affected	Small substation located on the corner of Pages Lane and Pound Hill is adjacent to the field. Unlikely to pose significant constraint
STNP7	Site unlikely to be affected	LV cable runs above the hedgerow between the field and the Pages Lane. Unlikely to be a significant constraint.
STNP8	Site unlikely to be affected	HV powerline running across the field however unlikely to pose significant constraint.
STNP9	Site unlikely to be affected	HV powerline running above the plot. Unlikely to pose a significant constraint.
STNP10	Site unlikely to be affected	HV powerline and BT line but unlikely to pose significant constraint
STNP11	Site unlikely to be affected	Power service cable and BT service cable are running above the plot and connect to the house

STNP12	Site unlikely to be affected	Some power and BT telephone lines along boundary of site. Unlikely to pose significant constraint.
STNP13	Site unlikely to be affected	Low Voltage (LV) along the eastern boundary. Unlikely to pose a significant constraint.
STNP14	Site unlikely to be affected	Telephone cables along Hills Road but unlikely to cause significant constraint.
STNP15	Site unlikely to be affected	Power service cable and BT service cable are running above the plot and connect to the house.
STNP16	Site unlikely to be affected	Some power and BT telephone lines along boundary of site. Unlikely to pose significant constraint.
MEADOW FARM	Site unlikely to be affected	Telephone cables along Chequers Lane but unlikely to cause significant constraint.
NILEFIELDS	Overhead lines unlikely to be significant. Anglian Water assets may affect site layout	Two sets of overhead lines crossing the site, unlikely to represent significant issue But as touched on by the AECOM assessment Anglian Water has highlighted in its response to the planning application: Underground sewers to be rediverted to remain accessible; Access required to existing pumping station that cannot be relocated; Anglian Water consider that dwellings located within 15 metres of the pumping station would place them at risk of nuisance in the form of noise, odour or the general disruption from maintenance work caused by the normal operation of the pumping station. Although AECOM assessment concludes this could be solved by site layout changes, the application is a final not outline one and no changes have been proposed in response to the Anglian Water comments. Conclusion: In order for the site to be considered for site selection, site proposer to put forward an alternate site layout that overcomes Anglian Water concerns

Table 12: Conditioning of Infrastructure Crossing Site Constraints

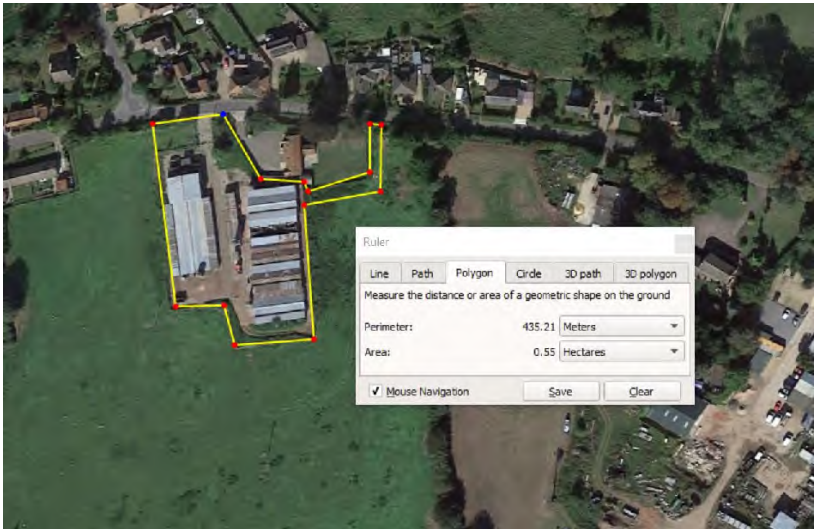
7.3.17 Utility access

None of the sites were identified by AECOM as having constraint regarding to access to utilities or establishing connections to utilities, therefore no further consideration of this constraint is required.

7.3.18 Would development result in coalescence

SITE NAME	LEVEL OF AECOM CONSTRAINT (COALESCENCE)	CONSTRAINT REVIEW / MITIGATION NOTES
STNP1	No	Contrary to the AECOM conclusion, the Saham Toney Parish Landscape Character Assessment, Part Two, Fringe Sensitivity Assessment ⁵ , states “Development in open areas here would change the character of this piece of land significantly and potentially cause coalescence of different settlement clusters.” The AECOM conclusion for this site is also contrary

⁵ By Lucy Batchelor-Wylam Chartered Member of the Landscape Institute, January 2019

		to its own conclusions for STNP4 and STNP5 in this respect which note that those sites could result in coalescence between Saham Toney and Saham Hills. On that basis since STNP occupies the same gap it must have the same potential impact. Conclusion: At its proposed extent the site cannot be considered for site selection, but could be reviewed for a smaller number of dwellings. Basis for site selection: Limit to the current brownfield footprint plus access. Based on the proposer's indicative site layout that could deliver 6 dwellings on a plot of approximately 0.55 hectares as shown below: 
STNP2	No	Conclusion: No further action required with regard to site being considered for selection.
STNP3	No	Conclusion: No further action required with regard to site being considered for selection.
STNP4	Potentially, particularly if STNP5, STNP6 and STNP7 are also developed	Conclusion: At the proposed scale the site cannot be considered for site selection, but could be reviewed for a smaller number of dwellings. See also highway assessments conditioning
STNP5	Potentially, particularly if STNP4, STNP6 and STNP7 are also developed	Conclusion: At the proposed scale the site cannot be considered for site selection, but could be reviewed for a smaller number of dwellings. See also highway assessments conditioning
STNP6	Site is not large enough, in isolation, to cause coalescence between the different clusters but would reduce the gap that it currently provides. Coalescence could occur if STNP4, STNP6 and STNP7 are also developed	Conclusion: Take this into account when selecting sites, if this site progresses to that stage, including combined effect with other adjacent potential sites
STNP7	Development would reduce the gap	Conclusion: At the proposed scale the site cannot be considered for site selection, but could be reviewed for a

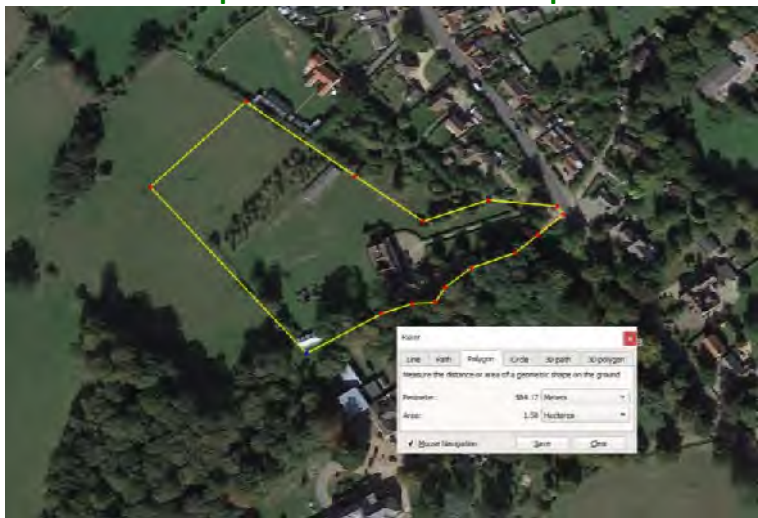
	between Saham Toney and Saham Hills and could result in coalescence, particularly if STNP4, STNP5 and STNP6 are also developed	smaller number of dwellings. See also highway assessments conditioning
STNP8	No	Conclusion: No further action required with regard to site being considered for selection.
STNP9	No	Conclusion: No further action required with regard to site being considered for selection.
STNP10	No	Conclusion: No further action required with regard to site being considered for selection.
STNP11	No	Conclusion: No further action required with regard to site being considered for selection.
STNP12	No	Conclusion: No further action required with regard to site being considered for selection.
STNP13	No	Conclusion: No further action required with regard to site being considered for selection.
STNP14	No	Conclusion: No further action required with regard to site being considered for selection.
STNP15	No	Conclusion: No further action required with regard to site being considered for selection.
STNP16	No	Conclusion: No further action required with regard to site being considered for selection.
MEADOW FARM	No	Conclusion: No further action required with regard to site being considered for selection.
NILEFIELDS	Site would represent an extension of the built form of Watton, the overall gap between Watton and Saham Toney would be reduced	The AECOM conclusion is flawed. Reduction of the gap between Saham Toney and Watton would contribute to coalescence. The site is not in Watton, and clearly extension of Watton's built form into Saham Toney is coalescence. The AECOM assessment also overlooks the fact that the site falls in the rural/urban gap defined in Policy 5 of the Neighbourhood Plan in which development is not permitted due to coalescence of Saham Toney with Watton. Conclusion: This constraint cannot be mitigated. Site ruled out of the site selection process

Table 13: Conditioning of Potential Coalescence Constraints

7.3.19 Is scale of development large enough to significantly change size and/or character of settlement

SITE NAME	LEVEL OF AECOM CONSTRAINT (SCALE OF DEVELOPMENT)	CONSTRAINT REVIEW / MITIGATION NOTES
STNP1	Unlikely	Although the AECOM assessment concludes the scale of the site is unlikely to significantly change the size of character of the settlement, the assessment of this site's landscape's sensitivity states "the open, undeveloped parts of the site have a higher sensitivity to development than the areas which contain built form". Conclusion: This adds weight to

		the conclusion regarding coalescence that the site, if selected, should be limited to the brownfield footprint, and hence to 6 dwellings, as outlined in 7.3.18
STNP2	Unlikely	Although the AECOM assessment concludes that development of the site would be unlike the prevailing character of the area, that overlooks the fact that the site is brownfield and thus already developed. Hence the AECOM constraint may be disregarded. Conclusion: No further action required with regard to site being considered for selection.
STNP3	Unlikely	Conclusion: No further action required with regard to site being considered for selection.
STNP4	Unlikely	Conclusion: No further action required with regard to site being considered for selection.
STNP5	Unlikely	Conclusion: No further action required with regard to site being considered for selection.
STNP6	Unlikely	Conclusion: No further action required with regard to site being considered for selection.
STNP7	Scale of the site may change the size and/or character of the settlement. The Fringe Sensitivity Assessment concludes that development in open areas here would change the character of this piece of land significantly	Under coalescence, the AECOM assessment notes this site would change the character of the land significantly. Conclusion: At the proposed scale the site cannot be considered for site selection, but could be reviewed for a smaller number of dwellings. See also highway assessments conditioning
STNP8	Scale of the site may change the size and/or character of the settlement.	Conclusion: At the proposed scale the site cannot be considered for site selection, but could be reviewed for a smaller number of dwellings
STNP9	No	Conclusion: No further action required with regard to site being considered for selection.
STNP10	Development of the site would be unlike the prevailing character of the area	The AECOM assessment concludes that development of the site would be unlike the prevailing character of the area, as refused planning application. Conclusion: At the proposed scale the site cannot be considered for site selection, but could be reviewed for a smaller number of dwellings.
STNP11	No	Conclusion: No further action required with regard to site being considered for selection.
STNP12	Development of the site would be unlike the prevailing character of the area (as per refused planning application).	Contrary to AECOM's conclusion, there has been no previous planning application for this site. Also approved planning application 3PL/2018/0563/O for an adjacent site sets a different precedent. The Saham Toney Fringe Sensitivity Assessment, January 2019 notes with respect to the area in which the site is located: "The valley side does not have capacity for a large estate which would be seen from elevated

		points, and which would reduce the rural feel of the area.” The proposal is not for a large estate, only 5 dwellings. Conclusion: Take the above into account when selecting sites, if this site progresses to that stage
STNP13	No	Conclusion: No further action required with regard to site being considered for selection.
STNP14	No	Conclusion: No further action required with regard to site being considered for selection.
STNP15	No	Conclusion: No further action required with regard to site being considered for selection.
STNP16	Unlikely, but would be unlike prevailing character of its area	The Saham Toney Fringe Sensitivity Assessment, January 2019 notes with respect to the area in which the site is located: “The valley side does not have capacity for a large estate which would be seen from elevated points, and which would reduce the rural feel of the area.” The site proposer has confirmed that were this site to be allocated, development of his adjacent site that has approval for 5 dwellings would not proceed and that the site would be screened from elevated viewpoints to the north. On this basis it is considered that a site of up to 15-20 dwellings would potentially be acceptable and should be examined through the site selection process. Conclusion: Reduce site size to 17⁶ dwellings on a plot of approximately 1.50 hectares, as shown below, and review it on that basis as part of the site selection process 
MEADOW FARM	Site is detached from the existing settlement	Conclusion: Take this into account when selecting sites, if this site progresses to that stage
NILEFIELDS	Scale unlikely to significantly change the size and/or character of the settlement and is well related to the existing settlement of Watton	The AECOM assessment is flawed. In terms of scale, the site, were it to be developed, would exceed the housing allocation specified in the Neighbourhood Plan (which itself is 50% more than the allocation to Saham Toney specified in the Local Plan). Being in the rural / urban gap and an area of high landscape sensitivity, and outside the settlement boundary it would also change the character of Saham Toney. The AECOM assessment has been misguided by the planning

⁶ c. 50% of proposed total

		application document which asserts the site is part of Watton, when in fact it is in Saham Toney. Conclusion: This constraint cannot be mitigated. Site ruled out of the site selection process
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Table 14: Conditioning of Impact on Size / Character of Settlement Constraints

7.3.20 Amenity Issues

SITE NAME	LEVEL OF AECOM CONSTRAINT (RESIDENTIAL AMENITY)	CONSTRAINT REVIEW / MITIGATION NOTES
STNP1	None	Conclusion: No further action required with regard to site selection.
STNP2	No	Conclusion: No further action required with regard to site selection.
STNP3	No	Conclusion: No further action required with regard to site selection.
STNP4	No	Conclusion: No further action required with regard to site selection.
STNP5	No	Conclusion: No further action required with regard to site selection.
STNP6	No	Conclusion: No further action required with regard to site selection.
STNP7	No	Conclusion: No further action required with regard to site selection.
STNP8	Unlikely	Conclusion: No further action required with regard to site selection.
STNP9	No	Conclusion: No further action required with regard to site selection.
STNP10	Development may affect the amenity of the existing dwellings fronting Hills Road and Bridge Lane. The use of the existing access point to serve residential dwellings may also result in a nuisance to the adjacent dwellings	Conclusion: Take this into account when selecting sites, if this site progresses to that stage
STNP11	Unlikely, consideration would need to be given to existing residential dwellings	Conclusion: Take this into account when selecting sites, if this site progresses to that stage
STNP12	No	Conclusion: No further action required with regard to site selection.
STNP13	Potential for issues of disturbance –	Conclusion: Take this into account when selecting sites, if this site progresses to that stage

	adjacent to working farm	
STNP14	No	Conclusion: No further action required with regard to site selection.
STNP15	Unlikely, consideration would need to be given to existing residential dwellings	Conclusion: Take this into account when selecting sites, if this site progresses to that stage
STNP16	No	Conclusion: No further action required with regard to site selection.
MEADOW FARM	No	Conclusion: No further action required with regard to site selection.
NILEFIELDS	Potential to impact the amenity of nearby properties	Conclusion: Take the possible amenity impact into account when selecting sites, if this site progresses to that stage

Table 15: Conditioning of Amenity Issue Constraints

7.4 Local Highway Authority constraints

7.4.1 Development Management Background

7.4.1.1 Paragraphs 109-11 of the National Planning Policy Framework, as quoted below, are relevant:

109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

110. Within this context, applications for development should:

- give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*

111. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

7.4.1.2 The Locality guide “Neighbourhood Planning and Transport” states that when making site allocations in a neighbourhood plan, issues like access, road safety and the capacity of transport networks can be included in the selection criteria.

7.4.1.3 Aim 1 of Norfolk County Council’s aims in development management relates to transport sustainability, and is: “Minimising travel to ensure people can access facilities they need by appropriate transport modes, encouraging walking, cycling and public transport use and reducing the use of private cars especially for shorter journeys⁷”. Among the guidance given to achieve this aim is:

- a) Emphasis needs to be placed on encouraging a shift away from use of the private car towards walking, cycling and public transport;
- b) People need to be able to reach employment and facilities, families and friends, without over-reliance on car travel which has created local air quality problems, safety issues and contributes to climate change; and
- c) Minimum walking distances need to take account of all dwellings on a residential site and all entrance/exit points for commercial use.

7.4.1.4 The County Council document goes on to explain that whilst Paragraph 109 of the National Planning Policy Framework provides useful clarification of national policy in relation to highway safety, supporting the position that highway safety is an important material consideration which should properly be taken into account and given due weight, it does not offer a formal definition of 'severe', but rather leaves it to Local Authorities to produce their own interpretation. In Norfolk, the County council defines that a 'severe' impact is deemed occur when:

- a) Queue lengths (and blocking back to previous junctions), delay and locational context, the Degree of Saturation⁸, Practical Reserve Capacity⁹, or Ratio of Flow to Capacity are unacceptable;
- b) Junctions do not conform to modern day standards and improvements cannot be made to bring them up to standard, or;
- c) A major residential development does not maximise the opportunity to travel by sustainable modes, in particular if it cannot provide a safe walking route to school or is outside of the nationally recognised acceptable walking distances to catchment schools (Department for Education - Home to School Travel and Transport Guidance).

7.4.1.5 From the above it is clear that when allocating sites, all other factors being equal, preference should be given to sites that are located so as to maximise opportunities for walking or cycling to key services. This entails considering the existing network of walking and cycling routes, and the potential for requiring development to link in to these networks. After opportunities for healthy and sustainable transport have been maximised, vehicular traffic can be considered. As per the National Planning Policy Framework, development (and hence also consideration for site selection) may only be prevented or refused where cumulative transport impacts are ‘severe’.

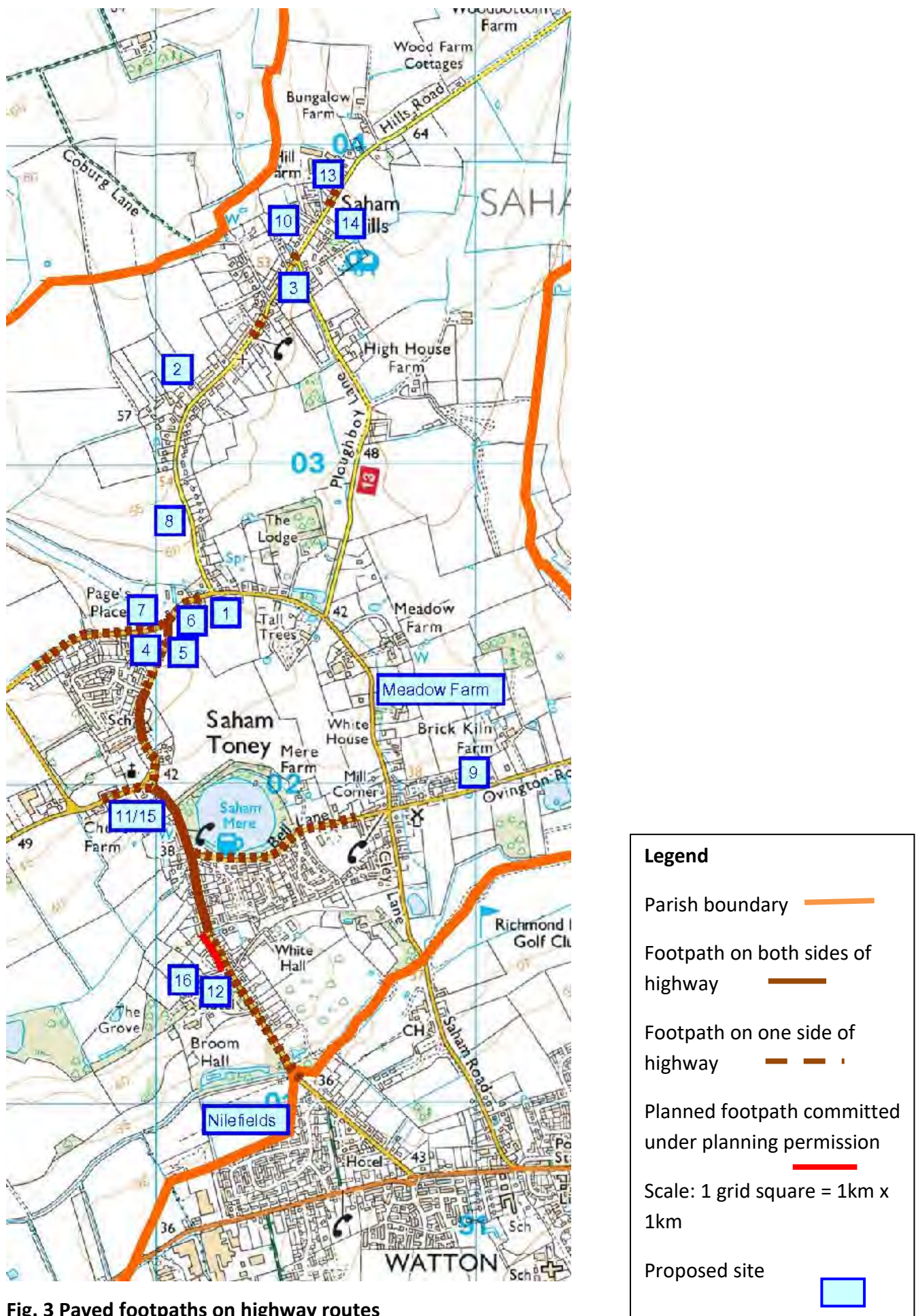
⁷ Norfolk County Council Safe Sustainable Development, Aims & Guidance Notes for Local Highway Requirements in Development Management, December 2018

⁸ The degree of saturation of an intersection (typically under traffic signal control) or road is a measure of how much demand it is experiencing compared to its total capacity

⁹ The practical reserve capacity (or ratio of flow to capacity) of a traffic signal junction is a commonly used measure of its available spare capacity, and is related to the degree of saturation of a traffic signal junction

7.4.2 Local Road Network

The Parish of Saham Toney has a limited number of paved footpaths along its highway routes, and no designated cycle routes. The extent of paved footpaths is shown in Figure 3, with the proposed sites indicated for context. It can be seen that while all proposed sites located in the Saham Toney part of the Parish, with the exception of STNP9 and Meadow Farm, have direct access to a paved footpath, those in Saham Hills do not.



7.4.3 Local Highway Authority Site Assessments

The Local Highway Authority carried out a brief assessment of sites STNP1 to 16, with regard to three constraints:

- a) Impact on the highway network (N);
- b) Suitability of a site's highway access (A); and
- c) Availability of footpaths to the village primary school (F).

The results are set out in Table 16.

	Constraints				
Site ID	A	N	F	Site suitable?	Local Highway Authority Remarks
STNP1	X			No	
STNP2	X	X	X	No	
STNP3		X	X	No	
STNP4				Yes	Highways would only support one of these coming forward with a maximum of 25 dwellings to avoid more traffic using the Pound Hill/ Richmond Road junction.
STNP5				Yes	
STNP6				Yes (note i)	
STNP7				Yes (note ii)	
STNP8		X		No	South end of Hills Road and junction with Page's Lane are both sub-standard
STNP9		X		No	
STNP10		X	X	No	
STNP11	X			No	
STNP12	X		X	No	
STNP13		X	X	No	
STNP14		X	X	No	
STNP15	X			No	
STNP16	X		X	No	

Table 16: Local Highway Authority Site Assessments

Notes

- (i) Dependent on achieving sufficient visibility at the junction with a sufficient distance from Pound Hill, or through site STNP5.
- (ii) Dependent on widening Page's Lane to 6m and providing a frontage footpath.

7.4.4 Conditioning of highway access constraints

7.4.4.1 Site STNP1. This constraint has been conditioned in section 7.3.3 and Appendices B1 and B2.

Conclusion: Constraint mitigated for the purposes of site selection, subject to the inclusion of the Local Highway Authority's conditions to 3PL/2015/1430/F in any site allocation policy for site.

7.4.4.2 Site STNP2. This constraint has been conditioned in section 7.3.3 and Appendices B3 and B4.

Conclusion: Constraint mitigated for the purposes of site selection, subject to the proposed highway access upgrade proposal being a criterion in any site allocation policy for the site.

7.4.4.3 Site STNP11. This site was reviewed in section 7.3.3. No obvious mitigation to the access constraint was identified. There is not sufficient clear visibility from the site entrance looking east due to the sharp bend in Richmond Road. **Conclusion: Site proposer would have to demonstrate a feasible scheme for highway access prior to any selection of this site for allocation.**

7.4.4.4 Site STNP12. This site would use the same access point as that for approved planning application 3PL/2018/0563/O (for 5 dwellings). That access was acceptable to the Local Highway Authority under condition of a new footpath being provided from the site access point to the existing footpath further north on Richmond Road. A scheme submitted by the applicant (also the proposer for site STNP12) was acceptable to the Local Highway Authority. Details can be found in Appendix B4. **Conclusion: Constraint mitigated for the purposes of site selection, subject to the provision of the new footpath included in conditions to approved planning application 3PL/2018/0563/O in any site allocation policy for site.**

7.4.4.5 Site STNP15. This site was reviewed in section 7.3.3. No obvious mitigation to the access constraint was identified. There is not sufficient clear visibility from the site entrance looking east due to the sharp bend in Richmond Road. **Conclusion: Site proposer would have to demonstrate a feasible scheme for highway access prior to any selection of this site for allocation.**

7.4.4.6 Site STNP16. This site would use the same access point as that for approved planning application 3PL/2018/0563/O (for 5 dwellings). That access was acceptable to the Local Highway Authority under condition of a new footpath being provided from the site access point to the existing footpath further north on Richmond Road. A scheme submitted by the applicant (also the proposer for site STNP12) was acceptable to the Local Highway Authority. Details can be found in Appendix B4. **Conclusion: Constraint mitigated for the purposes of site selection, subject to the provision of the new footpath included in conditions to approved planning application 3PL/2018/0563/O in any site allocation policy for site.**

7.4.5 Conditioning of highway network constraints

Network constraints relate to aspects such as road width, road junctions and footpaths. Footpaths were covered as a separate issue by the Local Highway Authority. Opportunities to mitigate a network constraint for sites for which the assessment identified such a constraint, are discussed below:

7.4.5.1 Site STNP2: This site was previously proposed under planning application 3PL/2015/0009/F. Although refused the only concern expressed by the Local Highways Authority was regarding site access (discussed under 7.3.3 and Appendices B3 and B4). In respect of the highway network no concerns were identified, and hence it is reasonable to conclude would not be if this site were to be allocated or reserved. **Conclusion: Highway network constraint has been mitigated for the purposes of site selection.**

7.4.5.2 Site STNP3: This site is for 4 new dwellings and is in close proximity to another 4-dwelling development on Ploughboy Lane, approved under planning application 3PL/2015/0879/O, subject to (among other conditions), the provision of a locally widened carriageway along the site frontage and passing places, both along the site frontage and adjacent to the junction of Ploughboy lane and Hills Road. It is reasonable to suggest that if suitable road widening and passing places were implemented to the satisfaction of the Local Highway Authority the network constraint on STNP3 could be mitigated. **Conclusion: No further action required with regard to the site being considered as part of the**

selection process. The provision of acceptable highway widening and passing place measures will be policy criteria if this site is selected as an allocated site.

7.4.5.3 Site STNP8: As noted in the Local Highway Authority's assessment remarks development of this site is constrained by the sub-standard condition of the southern end of Hills Road and the junction of Hills Road with Page's Lane. There is no obvious mitigation for this constraint, and it is noted that although on-site highway improvements may be feasible to address the former, their cost may impact on the site's viability; and the land surrounding the junction is not in the site proposer's ownership.

Conclusion: Site proposer would have to demonstrate a feasible scheme for highway and junction improvements prior to any selection of this site for allocation.

7.4.5.4 Site STNP9: Pre-application correspondence from the Local Highway Authority to the site proposer (see Appendix B6 and the preliminary site layout that relates to that in Appendix B5) concerning this site does not mention highway network concerns. However it is noted that the Local Highways Authority objected to planning application 3PL/2016/0766/F on the basis of development intensifying the use of the junctions of Ovington Road with Dereham Road, (A1075) and Cley Lane / Chequers Lane,(C121), considered substandard because of their design and inadequate visibility and this would cause danger and inconvenience to users of the adjoining public highway. That application was for 10 new dwellings, so cannot be directly applied to this site which proposes 3 new dwellings.

Conclusion: Site proposer to provide Local Highway Authority confirmation that the site would not present highway network concerns prior to any selection of this site for allocation.

7.4.5.5 Site STNP10: This is a proposal for 20 new dwellings with an access point approximately 20m from the junction of Hills Road and Ploughboy Lane. Other than the width of the access itself, the site proposer does not own any land between the site and the road junction and so could not readily make improvements to address Local Highway Authority concerns. **Conclusion: Site proposer would have to demonstrate a feasible scheme for highway and junction improvements prior to any selection of this site for allocation.**

7.4.5.6 Sites STNP13 and STNP14 are dealt with together as their site entrances would be within 100m of each other on the same stretch of Hills Road. Since neither site is close to a highway junction (although STNP14 is close to an unadopted track access to several dwellings on the opposite side of Hills Road), it is likely that the Local Highway Authority's network concerns relate to the width of Hills Road in the vicinity of the two sites. The site proposer owns land adjacent to the highway and thus may be able to offer suitable improvements to overcome the concerns. It is reasonable to suggest that if suitable road widening and passing places were implemented to the satisfaction of the Local Highway Authority the network constraint on STNP13 and STNP14 could be mitigated. **Conclusion: No further action required with regard to the site being considered as part of the selection process. The provision of acceptable highway widening and passing place measures will be policy criteria if this site is selected as an allocated site.**

7.4.6 Conditioning of footpath constraints

7.4.6.1 The approximate distances of sites STNP2, STNP3, STNP10, STNP13 and STNP14 from the village primary school are:

STNP2: 1330m (approximately 770m lacking a footway)

STNP3: 1670m (approximately 1100m lacking a footway)

STNP10: 1850m (approximately 1280m lacking a footway)

STNP13: 2015m (approximately 1435m lacking a footway)

STNP14: 1950m (approximately 1370m lacking a footway)

7.4.6.2 Given the above, and considering the number of dwellings proposed for each site, it would be unreasonable to expect the site developers to provide new footpaths from any of these sites that would link to the primary school, since the cost of doing so would not be proportionate and would inevitably make development not viable.

7.4.6.3 Furthermore, and more importantly, considered against National Planning Policy paragraph 109 and Norfolk County Council's interpretation of the term "severe" in that paragraph (see 7.4.1.4), only major development can be refused on the basis of not providing a safe walking route to school. Of the above sites only STNP10 (20 dwellings) is proposed as major development; sites STNP2, 3, 13 and 14 are for 4, 3, 5 and 5 new houses respectively and so would clearly constitute 'minor' development.

7.4.6.4 STNP10: **Conclusion: Site proposer would have to demonstrate an acceptable and safe scheme for provision of a safe walking route to the primary school prior to any selection of this site for allocation.**

7.4.6.5 Sites STNP2, STNP3, STNP13 and STNP14: **Conclusion: These minor development sites cannot be reasonably excluded from the site selection process on the basis of lacking footpaths to the village school, but this factor will be taken into account when rating sites as part of that process.**

7.4.7 Additional highway constraint on sites STNP4, STNP5, STNP6 and STNP7

7.4.7.1 As noted in Table 16, the Local Highway Authority advised it would only support one of these coming forward with a maximum of 25 dwellings to avoid more traffic using the Pound Hill / Richmond Road junction. The land at that junction is not in the ownership of either of the site proposers, who thus could not readily offer acceptable improvements (note: although the sites would also affect the junction of Pound Hill and Page's Lane, any necessary improvement at that junction could be made using land in the site owners' ownership). Conclusion: **Option 1 – limit the total number of dwellings for these four sites to 25 and undertake the site selection process for them on that basis. Option 2 - Site proposers would have to demonstrate a safe and viable scheme for improvements to the junction of Pound Hill and Richmond Road, acceptable to the Local Highway Authority prior to any selection of these sites for allocation at the level proposed.**

7.4.7.2 Pending any justification for option 2, and taking account of the conditioned AECOM assessment results relating to scale and impact on character and landscape, site selection for these sites will proceed on the basis of the following adjusted site sizes:

STNP4: 10 dwellings

STNP5: 4 dwellings on a site of approximately 0.35 hectares, as illustrated below:



Fig. 4: Amended Site Boundary for STNP5 in Response to AECOM Site Assessment

STNP6: 5 dwellings.

STNP7: 6 dwellings on a site of reduced size approximately 0.44 hectares, comprising the brownfield footprint, as illustrated below:

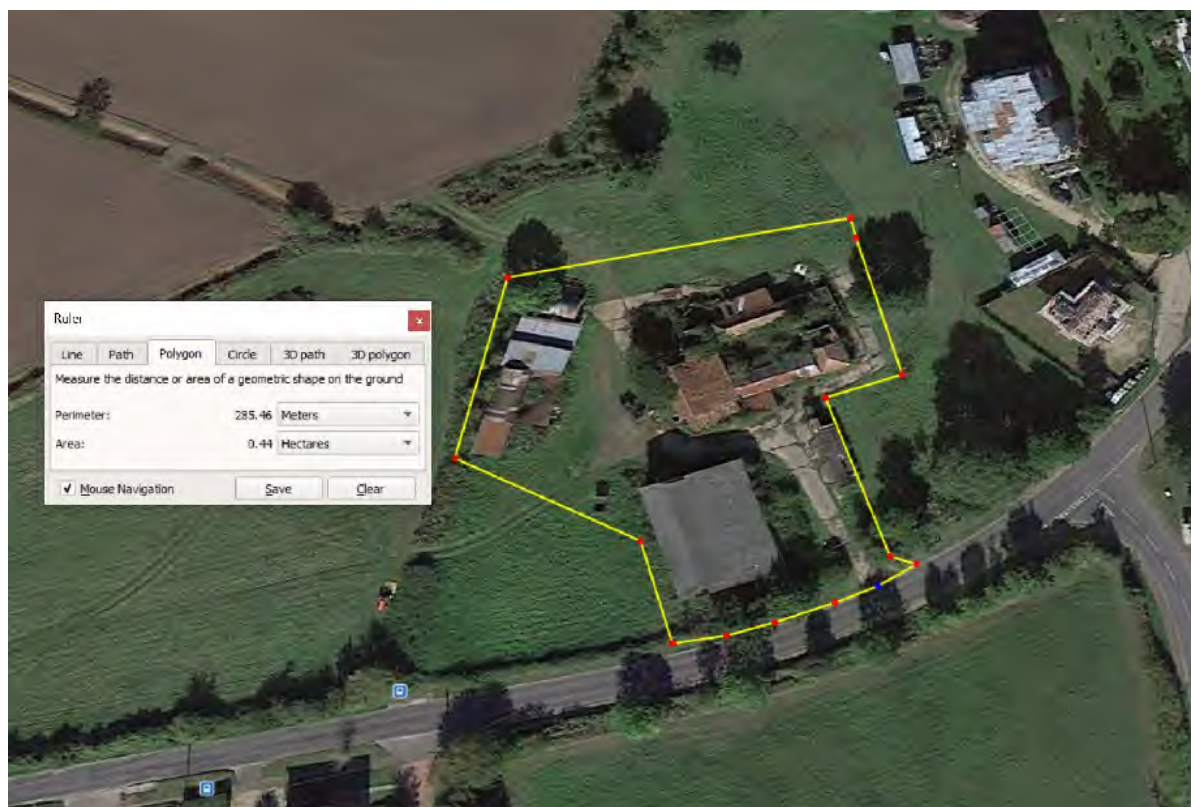


Fig. 5: Amended Site Boundary for STNP7 in Response to AECOM Site Assessment

Depending on the results of site selection the size of each site and its number of dwellings may be reconsidered.

7.5 Anglian Water constraints

7.5.1 Anglian Water's site assessments on given in Table 17.

RAG Key

Red	Major Constraints to Provision of infrastructure and/or treatment to serve proposed growth
Amber	Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required
Green	Capacity available to serve the proposed growth
N/A	Outside Anglian Water's boundary of water supply and / or service for sewerage treatment purposes

Site Ref	Housing Nos.	ADMC		WM		SGPE			Overall RAG rating
		Assets Affected	Assets Affected Comments	Water Resource	Supply Network	Used Water Water Recycling Centre (WRC)	WRC capacity	Used Water Network capacity	
STNP1	10	Green	N/A	Green	Green	Watton (WATTST)	Red	Green	Amber
STNP2	4	Green	N/A	Green	Green	Watton (WATTST)	Red	Green	Amber
STNP3	4	Amber	Foul sewer	Green	Green	Watton (WATTST)	Red	Green	Amber
STNP4	15	Green	N/A	Green	Green	Watton (WATTST)	Red	Green	Amber
STNP5	15	Green	N/A	Green	Green	Watton (WATTST)	Red	Green	Amber
STNP6	6	Amber	Water main	Green	Green	Watton (WATTST)	Red	Green	Amber
STNP7	35	Green	N/A	Green	Green	Watton (WATTST)	Red	Amber	Amber
STNP8	50	Amber	Water main and foul sewer	Green	Green	Watton (WATTST)	Red	Amber	Amber
STNP9	3	Green	Water main	Green	Green	Watton (WATTST)	Red	Green	Amber
STNP10	20	Green	N/A	Green	Green	Watton (WATTST)	Red	Amber	Amber
STNP11	2	Green	N/A	Green	Green	Watton (WATTST)	Red	Green	Amber
STNP12	5	Green	N/A	Green	Green	Watton (WATTST)	Red	Green	Amber
STNP13	5	Amber	Water main and foul sewer	Green	Green	Watton (WATTST)	Red	Green	Amber
STNP14	5	Green	N/A	Green	Green	Watton (WATTST)	Red	Green	Amber
STNP15	8	Green	N/A	Green	Green	Watton (WATTST)	Red	Green	Amber
STNP16	35	Green	N/A	Green	Green	Watton (WATTST)	Red	Amber	Amber

Table 17: Anglian Water site assessment results

7.5.2 The following notes were provided by Anglian Water to explain its assessments:

Water Supply Network

As you will see from the spreadsheet attached, there may be a requirement there is currently capacity available within the water supply network for the sites identified.

Water Recycling Centre capacity

Anglian Water has made an assessment of the available capacity at the receiving Water Recycling Centre (formerly known as sewage treatment works) for each of the proposed sites.

As you will see there is currently limited capacity at the Water Recycling Centre for additional growth in Saham Toney sewer catchment.

Anglian Water has a statutory obligation to provide sufficient capacity for sites with the benefit of planning permission. We are also currently in discussion with the Environment Agency about how this can be best achieved as part of a revised permit for the site. As such this shouldn't be viewed as an absolute constraint to additional residential development at Saham Toney.

Sewerage network

The foul (or used water) flows from future growth will have an impact on the existing foul sewerage network. We have undertaken an initial assessment but each site will be looked at specifically in the event that we are approached by a developer.

The foul infrastructure requirements will be dependent on the location, size and phasing of the development. All sites will require a local connection to the existing sewerage network which may include network upgrades.

The enclosed spreadsheet identifies where there is expected to be a need for improvements to the existing network to enable development of sites which have been proposed. The highlighting of these potential upgrades should not be seen as an objection to the allocation of these sites as we can work with the Council and developer(s) to ensure development is brought online at the correct time. Upgrades are to be expected as our sewers are not designed to have capacity for all future growth.

Asset encroachment

Where there are sewers or water mains crossing the site, the site layout should be designed to take these into account; this existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The sewers or mains should be located in highways or public open space. If it is not possible to accommodate the existing sewers or mains within the design then diversion may be possible under section 185 of the Water Industry Act 1991 or entering into a build over/near agreement may be considered.

We would suggest that the following wording be included if one or more of these sites is included in the Neighbourhood Plan as a part of the relevant site-specific policy:

Policy wording: *"There is an existing sewer[s]/water main[s] (delete as appropriate) in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account."*

Supporting text: *"This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewer/water main should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required."*

7.5.3 Conditioning of Anglian Water constraints

7.5.3.1 Anglian Water assets affected. This applies to sites STNP3, STNP6, STNP8 and STNP13 with respect to water mains and/or foul sewers. **Conclusion: No further action required with regard to the site being considered for the selection process. If any of these sites is selected as an allocated site, the site-specific policy will include the criterion and supporting text recommended in Anglian Water's assessment notes.**

7.5.3.2 Used water network capacity. Anglian Water has concerns regarding sites STNP7, STNP8, STNP10 and STNP16, and this relates to the number of dwellings. This can only be fully addressed as a final check on the sites selected for allocation, when a total number of dwellings is established. However, at this stage it may be noted that the number of houses to be allocated in the Neighbourhood Plan will be based on a minimum target of 48 (see section 4.0). In its response to planning application 3PL/2019/0010/F Anglian Water confirmed that its used water at the time of its response had available capacity for flows arising from the proposed 54 new dwellings, and since the time it made its site assessments, has not objected to a further 10 houses granted planning permission in the Neighbourhood Area. **Conclusion: No further action required with regard to the site being considered for the selection process. Request a final review by Anglian Water in this respect of the combined impact of sites identified by the site selection process as the best for allocation in the Neighbourhood Plan. (Note: In its subsequent representation to consultation on the pre-submission version of the Neighbourhood Plan, August-October 2019, which allocated a total of 83 houses, Anglian Water made no representation in this respect).**

7.5.3.3 Water recycling centre capacity. Anglian Water rated each site as red in this respect, and highlighted that there is currently limited capacity at its Water Recycling Centre for additional growth in the Saham Toney sewer catchment. However, the Anglian Water note on this topic goes on to identify likely mitigation through its statutory obligation to provide sufficient capacity for sites with the benefit of planning permission. **Conclusion: No further action required with regard to the site being considered for the selection process. Request a final review by Anglian Water in this respect of the combined impact of sites identified by the site selection process as the best for allocation in the Neighbourhood Plan. (Note: In its subsequent representation to consultation on the pre-submission version of the Neighbourhood Plan, August-October 2019, which allocated a total of 83 houses, Anglian Water made no representation in this respect).**

7.5.3.4 The other two Anglian Water assessment criteria (water resource and supply network) were rated "green" and thus do not require conditioning.

7.6 Lead Local Flood Authority constraints

7.6.1 The Lead Local Flood Authorities are given in Table 18.

Site number	Would Local Flood Risk / Surface Water Drainage constraints be severe enough to prevent	Level of Constraint	Recommendations	Major issues / Comments

	development of this site?			
STNP13	no	1 - Few or no Constraints	Standard information required at a planning stage.	There is no surface water risk identified on this site as shown in the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible).
STNP14	no	1 - Few or no Constraints	Standard information required at a planning stage.	There is no surface water risk identified on this site as shown in the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible).
STNP10	yes	3 - Significant mitigation required for severe constraints.	Recommend a review of the site and potential removal from the local plan.	A flow path, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps, flows through the northern section of the site. Watercourse is not apparent (in relation to SuDS hierarchy if infiltration is not possible). We recommend that there is no development done with in this site location as the surface water flow path covers the whole site. There is also reports flooding downstream to this location.
STNP3	yes	3 - Significant mitigation required for severe constraints.	Recommend a review of the site and potential removal from the local plan.	A flow path, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps, flows through the northern section of the site. Watercourse is not apparent (in relation to SuDS hierarchy if infiltration is not possible). We recommend that there is no development done with in this site location as the surface water flow path covers the whole site. There is also reports flooding downstream to this location.
STNP2	no	1 - Few or no Constraints	Standard information required at a planning stage.	There is no surface water risk identified on this site as shown in the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible).

STNP8	no	1 - Few or no Constraints	Standard information required at a planning stage.	Ponding, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps is shown to the centre of the site for the 0.1% AEP event. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible). AW foul sewer located in highway to N of site
STNP1	no	1 - Few or no Constraints	Standard information required at a planning stage.	Ponding, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps is shown to the centre of the site for the 0.1% AEP event. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible). AW foul sewer located in highway to N of site
STNP6	no	1 - Few or no Constraints	Standard information required at a planning stage.	Ponding, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps is shown to the centre of the site for the 0.1% AEP event. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible). AW foul sewer located in highway to N of site
STNP5	no	1 - Few or no Constraints	Standard information required at a planning stage.	Ponding, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps is shown to the centre of the site for the 0.1% AEP event. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible). AW foul sewer located in highway to NW of site
STNP4	no	1 - Few or no Constraints	Standard information required at a planning stage.	Ponding, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps is shown to the centre of the site for the 0.1% AEP event. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible). AW foul sewer located in highway to N of site
STNP7	no	2 - Mitigation required for heavy constraints.	Significant information required at a planning stage.	A flow path, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps, flows through the northern section of the site. Watercourse is apparent (in relation to SuDS hierarchy if infiltration is not possible). We recommend that the site boundary is amended so not with in this flow path. There is also

				reports flooding downstream to this location.
STNP15	no	1 - Few or no Constraints	Standard information required at a planning stage.	Ponding, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps is shown to the north of the site for the 0.1% AEP event. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible).
STNP11	no	1 - Few or no Constraints	Standard information required at a planning stage.	There is no surface water risk identified on this site as shown in the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible).
STNP16	no	1 - Few or no Constraints	Standard information required at a planning stage.	There is no surface water risk identified on this site as shown in the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible).
STNP12	no	1 - Few or no Constraints	Standard information required at a planning stage.	There is no surface water risk identified on this site as shown in the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible).
STNP9	no	1 - Few or no Constraints	Significant information required at a planning stage.	Ponding, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps is shown to the east of the site for the 0.1% AEP event. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible).

Table 18: Lead Local Flood Authority Site Assessments

7.6.2 Conditioning of Lead Local Flood Authority Constraints

7.6.2.1 For all but three of the 16 sites, the assessment conclusion is that flood risk / surface water drainage constraints would not be severe enough to prevent development of the sites and only the lowest level of constraint applies, which may be addressed by the provision of standard information at planning application stage. **Conclusion: For all but sites STNP3, STNP7 and STNP10 no further action required in order for them to be considered for site selection. Site allocation policies shall specify what information would be required with a planning application in respect of surface water flood risk and drainage.**

7.6.2.2 Site STNP7. This is assessed as having a level 2 constraint, requiring mitigation, that being the flow path running through the northern section of the site. The mitigation recommended by the Lead Local Flood Authority is to amend the site boundary so that the site is not within the identified flow path. Conclusion: **Option 1 - Constraint will be mitigated if the Lead Local Flood Authority's recommendation is adopted, and that correlates with the option 1 conclusion of 7.4.7.1 and 7.4.7.2 to reduce site size to mitigate highway constraints. Option 2 - Site proposer would have to demonstrate a practical and viable surface water flood risk mitigation scheme (both on-site and downstream) proven to be acceptable to the Lead Local Flood Authority prior to the sites being further considered for selection as allocated sites (in addition to satisfactorily mitigating the highways constraint on the site, per 7.4.7.1).**

7.6.2.3 Sites STNP3 and STNP10. For these sites the Lead Local Flood Authority recommends no development of the sites as the surface water flow path covers the whole site and there are reports of flooding downstream to their locations. **Conclusion: Site proposers would have to demonstrate a practical and viable surface water flood risk mitigation scheme (both on-site and downstream) proven to be acceptable to the Lead Local Flood Authority prior to the sites being further considered for selection as allocated sites.**

8.0 OVERALL RESULTS OF CONSTRAINT CONDITIONING

8.1 Following constraint conditioning given in section 7, the mitigations presented allow the conclusions of the four assessments outlined in section 3 to be modified as summarised in Tables 19 and 20.

	AECOM																					LHA				ANGLIAN WATER							LLFA		
CONSTRAINT	Land type	Location relative to settlement boundary	Highway access	Accessibility	Environmental designations	Ecology value	Landscape sensitivity	Agricultural land loss	Heritage impact	Location	TPO's on site	Impact on habitats and biodiversity	Public right of way	Social or community value	Ground contamination	Infrastructure crossing site	Utility access	Coalescence with neighbouring towns	Size & character of development	Amenity	CONDITIONED OVERALL RATING		Access	Highway Network	Footpaths to school		Assets affected	Resource	Supply network	Water recycling centre capacity	Used water network capacity	Overall RAG rating		Would constraints prevent development?	Level of constraint
STNP1	M							➡		➡								➡	➡				➡												
STNP2	B									➡													➡	➡	➡										
STNP3	G							➡		➡														➡	➡									*	*
STNP4	G						➡	➡	➡	➡													25	25	25										
STNP5	G	➡					➡	➡		➡													25	25	25										
STNP6	G						➡	➡		➡													25	25	25										
STNP7	M			➡	➡		➡			➡					➡								25	25	25										
STNP8	G		➡*	*	➡					➡					➡						➡*			*											
STNP9	G							➡		➡											➡			➡											
STNP10	G		*	*	➡*			➡		➡										➡	*			*	*									*	*
STNP11	G➡		*							➡											*		*												
STNP12	G									➡										➡			➡		➡										
STNP13	G			➡						➡											➡			➡	➡										
STNP14	G			➡						➡											➡			➡	➡										
STNP15	M➡		*							➡											*		*												
STNP16	M	➡		➡						➡									15-20				➡												
Meadow Farm	G	⊗								➡											➡⊗														
Nilefields	G	➡⊗	*	*	➡*	➡*	⊗	➡				➡*				➡*		➡⊗	➡⊗		➡⊗														

Table 19. Summary of Site Assessment Results Following Conditioning

Table 19 Legend:

Conditioning improves rating	⬆	
Conditioning reduces rating	⬇	
Site proposer may be able to demonstrate acceptable constraint mitigation	*	
Constraint cannot be mitigated	☒	
Proposed site size reduced to mitigate constraint	25	For sites STNP4-7, 25 dwellings is a combined total

Site ID	AECOM	Local Highways Authority	Lead Local Flood Authority	Anglian Water
STNP1	May be suitable	May be suitable	Suitable	For all sites: Infrastructure and/or treatment upgrades required to serve proposed growth or diversion of assets may be required
STNP2	May be suitable	May be suitable	Suitable	
STNP3	May be suitable	May be suitable	Not suitable (note vii)	
STNP4	May be suitable	Suitable (note ii)	Suitable	
STNP5	May be suitable	Suitable (note ii)	Suitable	
STNP6	May be suitable	Suitable (notes ii and iii)	Suitable	
STNP7	May be suitable	Suitable (notes ii and iv)	May be suitable (note xiv)	
STNP8	Not suitable (notes v and vi)	Not suitable (note xi)	Suitable	
STNP9	May be suitable	Not suitable (note xii)	Suitable	
STNP10	Not suitable (note v)	Not suitable (notes xi and xiii)	Not suitable (note vii)	
STNP11	Not suitable (note v)	Not suitable (note v)	Suitable	
STNP12	May be suitable	May be suitable	Suitable	
STNP13	May be suitable	Not suitable (note xi)	Suitable	
STNP14	May be suitable	Not suitable (note xi)	Suitable	
STNP15	Not suitable (note v)	Not suitable (note v)	Suitable	
STNP16	May be suitable	May be suitable	Suitable	
Meadow Farm	Not suitable (note xv) Excluded from site selection	Not assessed (see note i)	Not assessed (see note i)	Not assessed (see note i)
Nilefields	Not suitable (notes v-x and xv) Excluded from site selection	Not assessed (see note i)	Not assessed (see note i)	Not assessed (see note i)

Table 20: Overall Summary Site Assessment Conclusions After Conditioning

Notes to Table 20:

i) The Meadow Farm and Nilefields sites were assessed by AECOM on the basis of them being undecided planning applications at the time of their assessment. Since they were not put forward via the Call for Sites, they were not assessed by the other three agencies, who completed their reviews prior to AECOM identifying the sites.

ii) Highways would only support one of these 4 sites coming forward with a maximum of 25 dwellings to avoid more traffic using the Pound Hill/ Richmond Road junction.

iii) In addition to note (ii), site would be acceptable if sufficient visibility could be achieved at the junction with a sufficient distance from Pound Hill Lane or through site STNP 5.

iv) In addition to note (ii), it would be necessary to widen Pages Lane to 6m and provide a frontage footpath.

v) Unless site proposer can demonstrate an acceptable site access scheme.

vi) Unless site proposer can demonstrate an acceptable site accessibility scheme.

vii) Unless site proposer can demonstrate a satisfactory flood risk mitigation proposal.

viii) Unless site proposer can demonstrate a satisfactory ecological mitigation proposal or is able to present a satisfactory ecological appraisal.

ix) Constraint regarding coalescence cannot be mitigated and therefore the Nilefields site is excluded from the site selection process.

x) Constraint regarding scale of development cannot be mitigated and therefore the Nilefields site is excluded from the site selection process.

xi) Unless site proposer can demonstrate an acceptable access scheme for highway and/or junction improvements.

xii) Unless site proposer can provide Local Highway Authority confirmation that the site would not present highway network concerns.

xiii) Unless site proposer can demonstrate an acceptable scheme for provision of a safe walking route to the village primary school.

xiv) Subject to a reduction in site size.

xv) Constraint regarding location relative to the Saham Toney settlement boundary cannot be mitigated and hence site is excluded from the site selection process.

8.2 As a result of constraint conditioning, the sites at Meadow Farm and Nilefields are excluded from the selection process. In the case of sites STNP1, STNP4, STNP5, STNP6, STNP7 and STNP16, modifications to site size and/or capacity have been shown to be necessary by the constraint conditioning. In order to be selected sites STNP8, STNP10, STNP11 and STNP15 first require further evidence of acceptable mitigation to the constraints identified in section 7, but will be included in the selection process on that proviso. Thus, the details of sites that will go through the selection process are as shown in Table 21.

Site ID	Site Location	Site Area (ha)	Number of dwellings
STNP1	Grange Farm Piggeries, Chequers Lane	0.55	6
STNP2	The Croft Piggery, 69, Hills Road	0.5	4
STNP3	Junction of Hills Road and Ploughboy Lane	0.246	4
STNP4	Junction of Pound Hill and Page's Lane	0.813	10
STNP5	Pound Hill East	0.35	4
STNP6	Page's Lane east, near Pound Hill junction	0.46	5
STNP7	Page's Lane Farm	0.48	6
STNP8	Hills Road south, opposite Dolphin Crescent	2.59	40-50
STNP9	Ovington Road	0.445	3
STNP10	Behind 129 & 131 Hills Road	1.6	20
STNP11	8 Richmond Road (option 1)	0.15	2
STNP12	Richmond Hall (option 1)	0.24	5
STNP13	Hill Farm, Hills Road	0.2	5
STNP14	Croft field, Hills Road	0.3	5
STNP15	8 Richmond Road (option 2)	0.4	4
STNP16	Richmond Hall (option 2)	1.5	17

Table 21: Summary Details of Proposed Sites After Constraint Conditioning

8.3 For the sites reduced in size and/or capacity by constraint conditioning, the reasons for those reductions are given in section 7, but for convenience are summarised below:

- a) Site STNP1: Due to the site as proposed leading to coalescence of settlement clusters and its inappropriate scale and location with respect to its character area and sensitivity, both site size and capacity reduced;
- b) Site STNP4: Due to the site as proposed leading to coalescence of settlement clusters and Local Highway Authority constraint on the combined capacity of sites STNP4-7, capacity reduced;
- c) Site STNP5: Due to the site as proposed leading to coalescence of settlement clusters and Local Highway Authority constraint on the combined capacity of sites STNP4-7, both size and capacity reduced;
- d) Site STNP7: Due to the site as proposed leading to coalescence of settlement clusters; its inappropriate scale and location with respect to its landscape character area and sensitivity, flood risk constraint identified by the Lead Local Flood Authority and Local Highway Authority constraint on the combined capacity of sites STNP4-7, both size and capacity reduced;
- e) Site STNP16: Due to the site as proposed being inappropriate in scale and location with respect to its character area and sensitivity, both size and capacity reduced.

8.4 For those sites whose sizes have been reduced by conditioning, the revised site boundaries established in section 7 are shown in Figures 6 to 9.

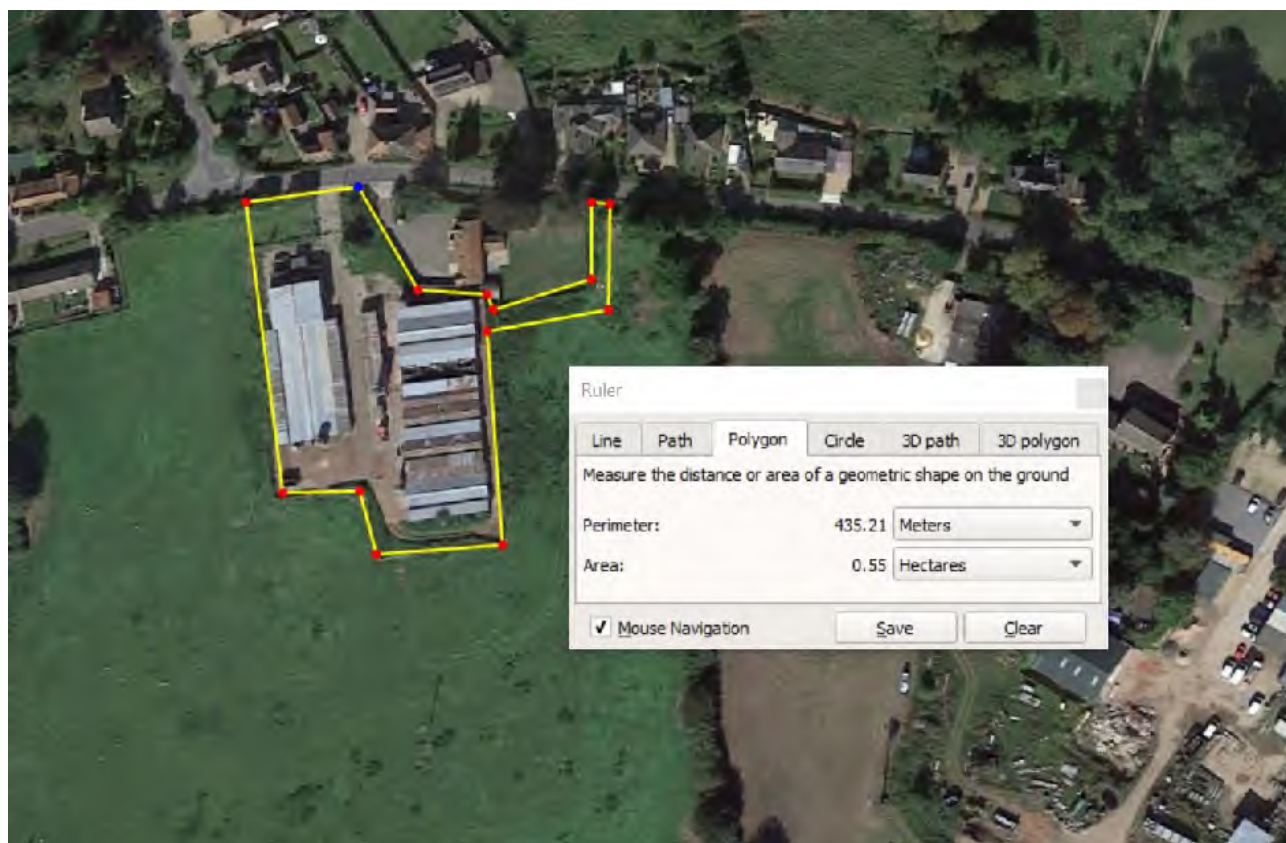


Fig. 6: Revised Site Boundary for Site STNP1

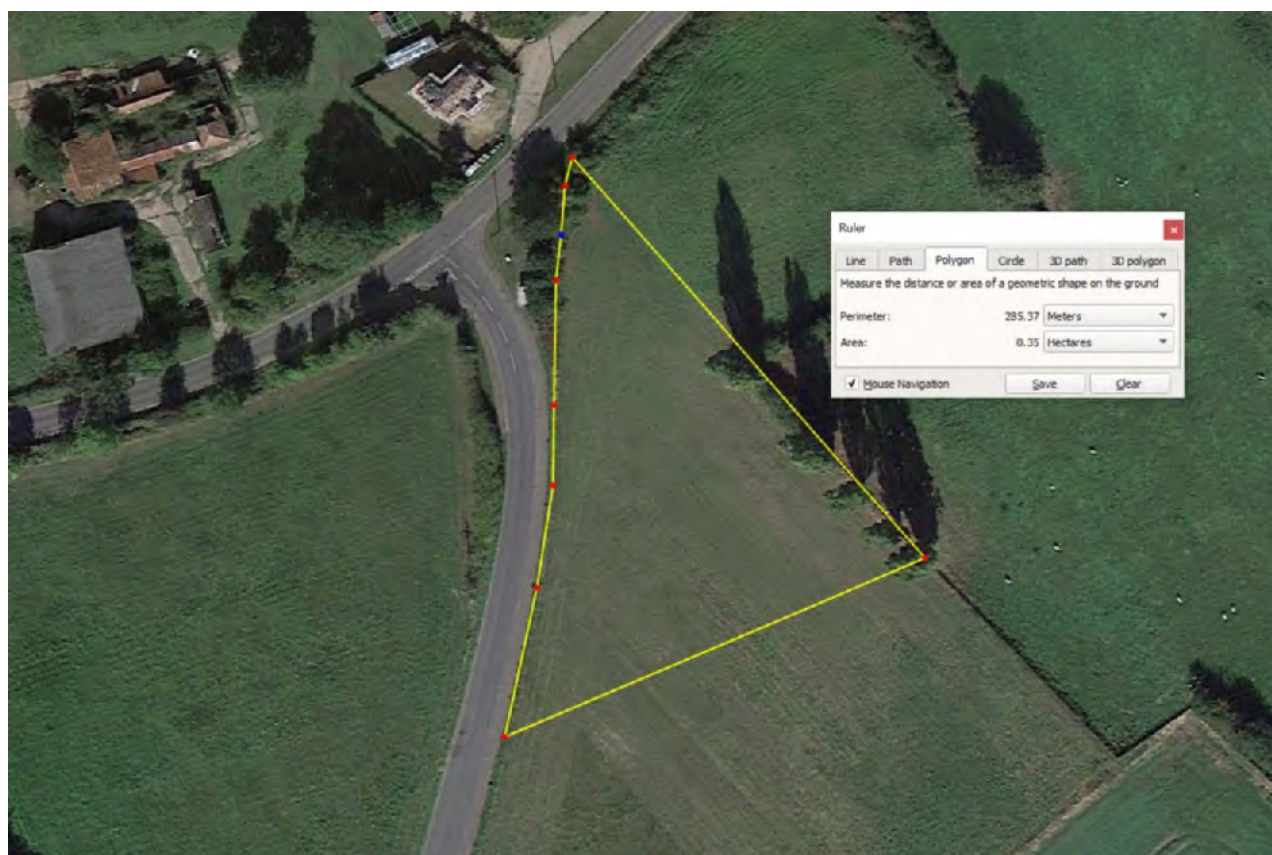


Fig. 7: Revised Site Boundary for Site STNP5

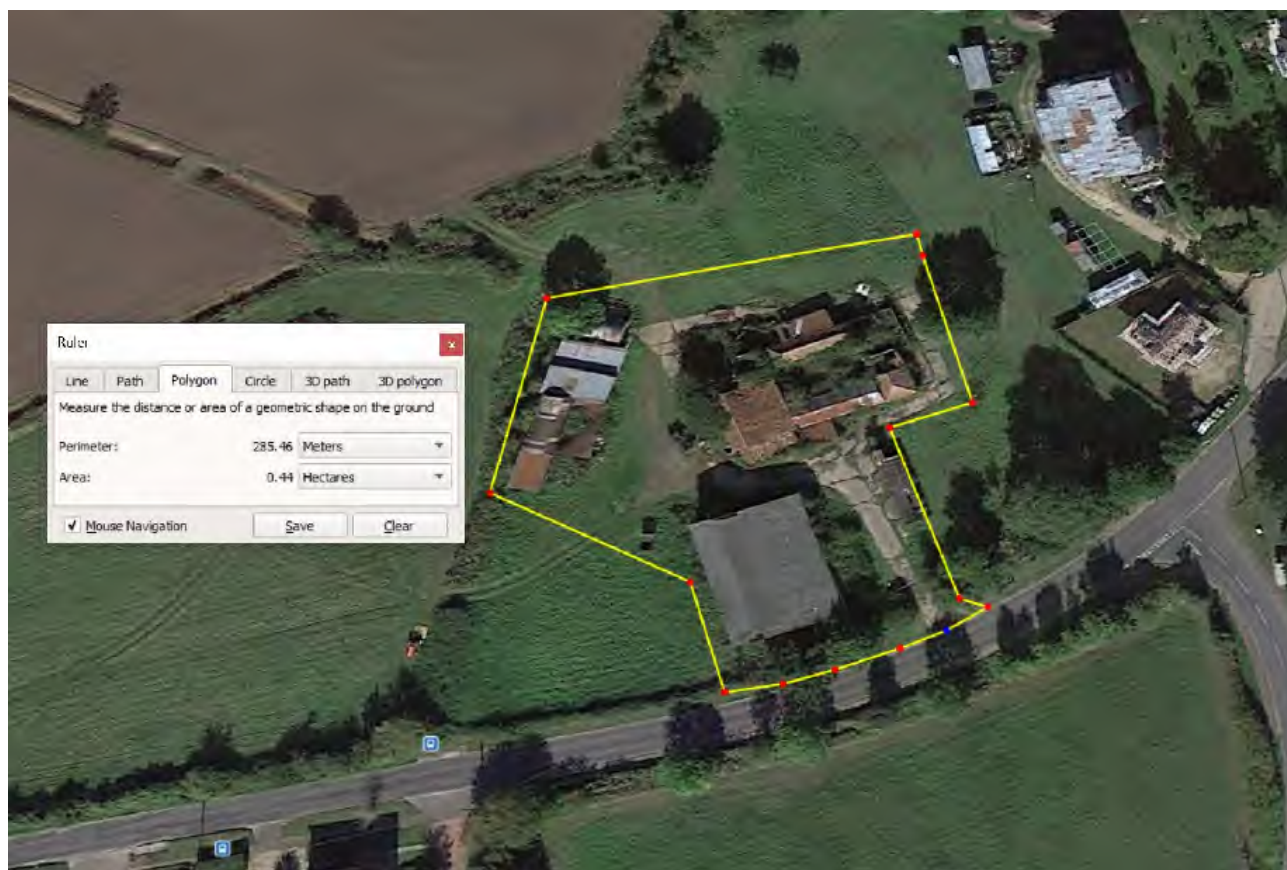


Fig. 8: Revised Site Boundary for Site STNP7

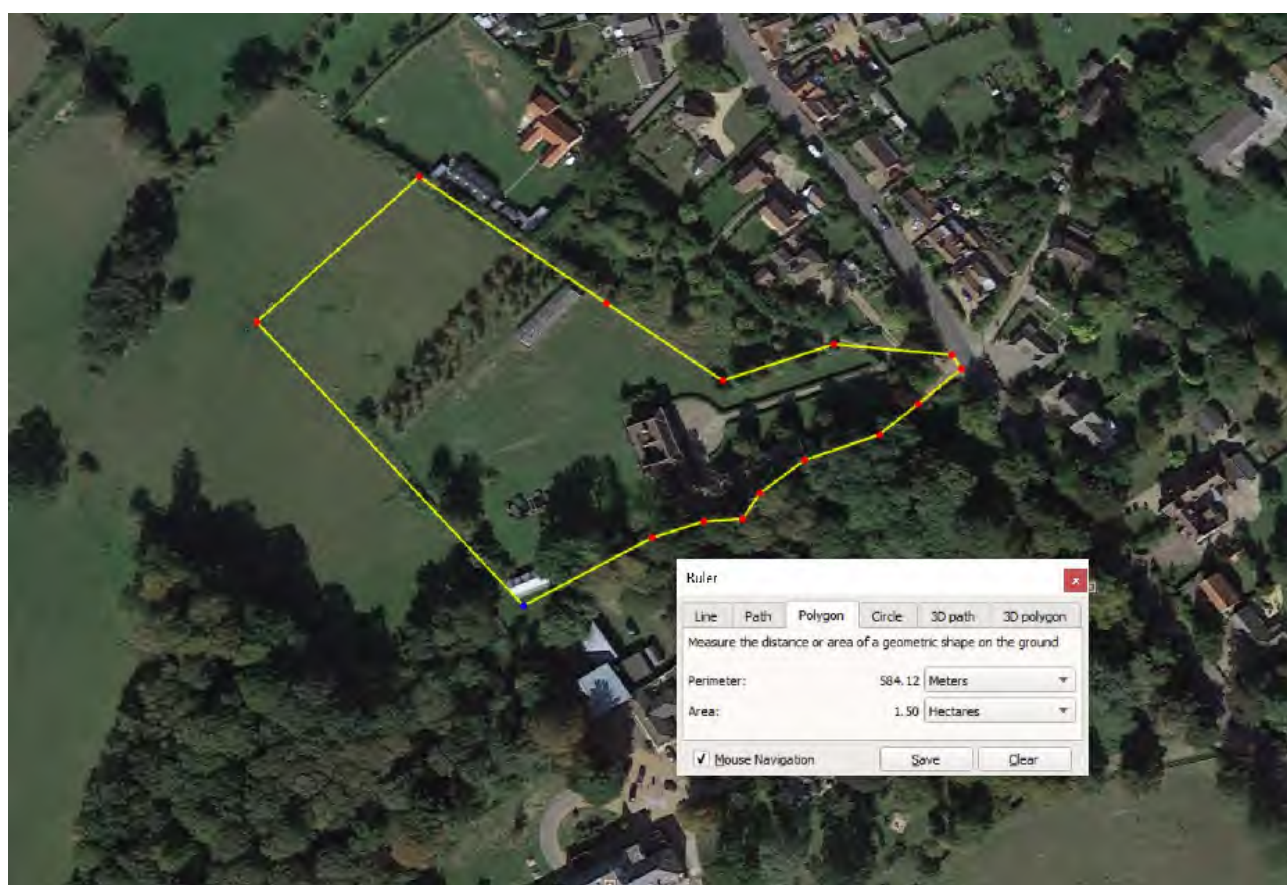


Fig. 9: Revised Site Boundary for Site STNP16

9.0 POLICY AND SUSTAINABILITY CONFORMANCE CHECK

9.1 CONFORMANCE WITH RELEVANT POLICIES OF THE LOCAL PLAN

9.1.1 Before being approved for development through the normal planning process, any site that is allocated in the Saham Toney Neighbourhood Plan must conform with all relevant policies of the Breckland Local Plan. While the same must be shown to be true before a site is allocated, there are fewer Local Plan policies that are relevant to a decision on site selection. Those Local Plan policies considered relevant to site selection, are set out¹⁰ in sections 9.1.2 to 9.1.5.

9.1.2 Policy HOU 04: Villages with Boundaries

Appropriate development will be allowed immediately adjacent to the settlement boundary, subject to being supported by other policies within the Development Plan Local Plan and where all of the following criteria are satisfied:

- 1) The development is of an appropriate scale and design to the settlement;*
- 2) The design contributes to preserving, and where possible enhancing, the historic nature and connectivity of communities; and*
- 3) The development avoids coalescence of settlements.*

These criteria are covered in a more local context by the Neighbourhood Plan and hence will be considered as part of the compliance check against that Plan's policies (see section 9.3).

The following additional criterion is specified by Local Plan policy HOU 04:

It would not lead to the number of dwellings in the settlement significantly increasing by more than 5% from the date of adoption of the Plan. The settlement refers to the number of dwellings inside the defined settlement boundary;

However, this is superseded by the total allocation defined in section 4, which is the baseline against which sites will be selected.

9.1.3 Policy ENV 07: Designated Heritage Assets

- 1) The significance of designated heritage assets (including their settings) such listed buildings, scheduled monuments, registered parks and gardens, conservation areas, will be conserved, or wherever possible, enhanced.*

This criterion is covered in a more local context by the Neighbourhood Plan and hence will be considered as part of the compliance check against that Plan (see section 9.3).

9.1.4 Policy ENV 08: Non-Designated Heritage Assets

- 1) Development will should be expected to conserve, or and wherever possible enhance the historic character, appearance and setting of non-designated historic assets.*

¹⁰ Where appropriate, only extracts of policy next are given, to allow focus on key issues relating to site selection

2) *Development proposals should identify assets of archaeological significance.*

The first of these criteria is covered in a more local context by the Neighbourhood Plan and hence will be considered as part of the compliance check against that Plan (see section 9.3).

The second of these criterion does not warrant exclusion of a site from selection as even were archaeological assets to be found subsequently on a proposed site, that would not preclude development. Hence it will not be considered in the conformance check

9.1.5 ENV 09: Flood Risk and Surface Water Drainage

All new development will:

- 1) *Be located to minimise the risk of flooding, mitigating any such risk through design and implementing sustainable drainage (SuDS) principles.*
- 2) *Incorporate appropriate surface water drainage mitigation measures to minimise its own risk of flooding and should not materially increase the flood risk to other areas.*

The first of these criteria is covered in a more local context by the Neighbourhood Plan and hence will be considered as part of the conformance check against that Plan (see section 9.3).

The second will be considered in the overall conformance check, but only to the extent that the potential exists for feasible mitigation measures to be adopted, rather than a detailed study of what those measures might entail.

Potential sites will be rated against this criterion as follows:

- 4 = No requirement for mitigation;
- 3 = Mitigation measures likely to be on a small scale and straightforward;
- 2 = Mitigation measures on a larger scale, but still straightforward;
- 1 = Mitigation measures possible but unlikely to be straightforward;
- 0 = Mitigation measures unlikely to be practical.

9.2 PERFORMANCE AGAINST BRECKLAND LOCAL PLAN SUSTAINABILITY OBJECTIVES

9.2.1 The Local Plan sets out nineteen sustainability criteria, which are listed in Table 22. Some, but not all, of them are relevant to the selection of sites for allocation.

Table 22: Local Plan Sustainability Objectives				
1. Minimise the irreversible loss of undeveloped land and productive agricultural holdings.	5. Reduce contributions to climate change and localised air pollution.	9. Maintain, enhance and preserve the distinctiveness, diversity and quality of landscape and townscape character	13. Improve the quality and quantity of accessible open space	17. Increase the vitality and viability of existing town centres.
2. Limit water consumption to the capacity of natural processes and	6. To adapt to climate change and avoid, reduce and manage flood	10. Conserve and where appropriate enhance the historic environment	14. Improve the quality, range and accessibility of essential services	18 Help people gain access to satisfying work appropriate to

storage systems and maintain and enhance water quality	risk.		and facilities	their skills, potential and place of residence
3: Ensure the sustainable reuse of water to accommodate additional growth and development with minimal impacts on water quality	7. Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity.	11. Improve the health and well-being of the population.	15. Redress inequalities related to age, gender, disability, race, faith, location and income	19 Improve the efficiency, competitiveness and adaptability of the local economy.
4. Minimise the production of waste and support the recycling of waste.	8. Protect, enhance and increase Green Infrastructure in the District	12. Reduce and prevent crime	16. Ensure all groups have access to affordable, decent and appropriate housing to meet their own needs.	

9.2.2 Objectives 2 to 5, 11, 12, 14, 15, and 17 to 19 are not relevant to site selection at Neighbourhood Area level and are not considered in this report.

9.2.3.1 Regarding objective 1, the irreversible loss of undeveloped land will be considered by rating potential sites as follows in the overall conformance check:

4 = No loss of undeveloped land (i.e. site entirely brownfield);

3 = The undeveloped land that would be lost comprises no more than 25% of the total area of the potential site;

2 = The undeveloped land that would be lost comprises between 26% and 50% of the total area of the potential site;

1 = The undeveloped land that would be lost comprises between 51% and 75% of the total area of the potential site;

0 = The site is entirely greenfield.

9.2.3.2 Regarding objective 1, potential loss of agricultural land will be considered by rating potential sites as follows in the overall conformance check:

2 = No loss of agricultural land;

1 = The agricultural land that would be lost is of grade 3b or lower and comprises an area less than 20 hectares¹¹;

0 = The agricultural land that would be lost is of grade 3b or lower and comprises an area greater than or equal to than 20 hectares;

-1 = The agricultural land that would be lost is of grade 3a or higher and comprises an area less than 20 hectares;

¹¹ 20 hectares site size selected as it triggers a requirement for consultation with Natural England

-2 = The agricultural land that would be lost is of grade 3a or higher and comprises an area greater than or equal to than 20 hectares;

9.2.4 The climate change aspect of objective 6 is not relevant to site selection at Neighbourhood Area level. The flood risk aspect is covered under the overall conformance check against Policy 8 of the Neighbourhood Plan.

9.2.5 Objective 7 is covered under the overall compliance check against Policy 7D of the Neighbourhood Plan.

9.2.6 Objective 8 although relevant to the Neighbourhood Plan, is not included in the site rating process as there is no meaningful information available as a result of the site proposals with which to objectively review each site in this respect.

9.2.7 Objective 9 is covered under the overall compliance check against Policy 7A of the Neighbourhood Plan.

9.2.8 Objective 10 is covered under the overall compliance check against Policy 6 of the Neighbourhood Plan.

9.2.9 Objective 13 will be considered by rating potential sites as follows in the overall conformance check:

2 = The site offers significant potential to improve the quality or quantity of accessible open space;

1 = The site offers some potential to improve the quality or quantity of accessible open space;

0 = The site would neither improve nor reduce the quality or quantity of accessible open space;

-1 = The site would make a minor reduction to the quality or quantity of accessible open space;

-2 = The site would make a significant reduction to the quality or quantity of accessible open space.

9.2.10 Objective 16 is covered under the overall compliance check against Policy 2D of the Neighbourhood Plan.

9.3 COMPLIANCE WITH RELEVANT POLICIES OF THE EMERGING NEIGHBOURHOOD PLAN

9.3.1 Before being approved for development through the normal planning process, any site that is allocated in the Saham Toney Neighbourhood Plan must comply with all relevant policies of that Plan. While the same must be shown to be true before a site is allocated, not all Neighbourhood Plan policies are relevant to that decision. Those Neighbourhood Plan policies that are considered relevant to site selection are listed in Table 23.

Policy	Policy class	Relevant to site selection?	Notes on relevance to site selection
1: Saham Toney's Sustainable Development Principles	A	Yes	With regard to distance to services and facilities
2A: Residential Housing Allocation	A	No	Will be used to guide the number of sites selected for allocation

2B: Residential Development Within The Settlement Boundary	A	No	All proposed sites are outside the settlement boundary
2C: Residential Development Outside The Settlement Boundary	B	No	Policy sets the hierarchy of sites to be supported but has no criteria relevant to site selection
2D: Affordable Housing	A	No	Not relevant because it deals with local connection occupancy rather than the provision of affordable housing which is dealt with by the Local Plan
2E: Housing Mix	A	Yes	To a limited extent where site proposers have provided an indication of house types
2F – 2P: Individual Site Allocations	A	No	Will be decided as a result of the site selection process
3A: Design	B	Yes	Aspects relating to amenity and heritage asset setting are relevant factors in selecting sites
3B: Density of Residential Developments	B	Yes	As applicable to the area in which a site is located
3C: Site Access and On-Site Streets	A	Yes	With regard to site access only
3D: Parking	C	No	Not a relevant factor in selecting sites
3E: Dark Skies Preservation	C	No	Not a relevant factor in selecting sites
4: Non-Residential Development	B	No	Site selection deals only with residential development
5: Saham Toney Rural / Urban Gap	A	No	No proposed site is in the rural / urban gap area
6: Heritage Assets	B	No	Potential impact of a proposed site on an asset's setting / significance is covered under criteria applying to Policy 3A
7A: Landscape Character Preservation and Enhancement	A	Yes	With particular reference to the Saham Toney Parish Landscape Assessment, Volumes 1-3
7B: Key Views	A	Yes	
7C: Local Green Spaces	A	No	No proposed site impacts on a Local Green Space
7D: Biodiversity and Habitats	B	Yes	The policy has some flexibility and allows mitigation of impact
7E: Green Infrastructure	B	No	Site proposals at this stage by their nature, cannot be realistically reviewed for potential impact
7E: Trees and Hedges	C	No	Site proposals at this stage by their nature, cannot be realistically reviewed for potential impact
8: Surface Water Management and Sewerage Provision	A	Yes	Consideration of each site's surface water flood risk is relevant.

Table 23: List of Neighbourhood Plan Policies (at Pre-Submission) and Their Relevance to Site Selection

Notes to Table 23:

Neighbourhood Plan policies are classified in three groups for the purposes of establishing the relative importance of site selection criteria, as follows:

- a) Class A: Very important policy in terms of site selection criteria;
- b) Class B: Important policy in terms of site selection criteria;
- c) Class C: Moderately important policy in terms of site selection criteria.

9.3.2 The policy criteria against which the proposed sites will be reviewed at pre-submission stage are set out¹² in sections 9.3.2.1 to 9.3.2.9. It must be noted that because of the nature of the site proposals, these reviews are not intended as an indication of how any site may be judged against policies by the Local Planning Authority should a planning application be submitted in future, they are for use in site selection only.

9.3.2.1 Policy 1: Service, Facilities & Infrastructure

- 1) All developments shall have acceptable availability and accessibility of services and facilities.*

Based on the policy supporting text review of this criteria will consider two factors:

- a) Walking distance to a bus stop (minus score reflects non-compliance with policy supporting text):
 - 3 = Up to 400m, via a paved footpath over all or a large part of the route;
 - 2 = Up to 400m, no paved footpath over all or a large part of the route;
 - 1 = 401 – 800m, via a paved footpath over all or a large part of the route;
 - 0 = 401 - 800m, no paved footpath over all or a large part of the route;
 - 1 = Over 800m, regardless of footpaths.
- b) Distance to services or facilities by any means (minus score reflects non-compliance with policy supporting text):
 - 3 = Up to 1000m, with a paved footpath available over all or a large part of the route;
 - 2 = Up to 1000m, but with no paved footpath over all or a large part of the route;
 - 1 = 1001 – 2000m, with a paved footpath available over all or a large part of the route;
 - 0 = 1000 - 2000m, but with no paved footpath over all or a large part of the route;
 - 1 = Over 2000m, regardless of footpaths.

9.3.2.2 Policy 2E: Housing Mix

- 1) Residential development proposals shall include a housing mix and tenure which respond to local housing need having particular regard to the demographic characteristics of the Parish of Saham Toney and as set out in the Saham Toney Housing Needs Assessment*

In broad terms the housing needs assessment favours 1, 2 and 3 bed-room homes, so proposals that have suggested housing development of that type are viewed favourably, whilst recognising that at this stage such suggestions are not firm proposals. Although larger houses are not excluded by the policy, in

¹² Where appropriate, only extracts of policy next are given, to allow focus on key issues relating to site selection

order to reflect a wish to redress the current balance of house sizes, in terms of site selection they are scored negatively.

- 2 = Proposal is entirely for 1,2 or 3 bed-room houses;
- 1 = Proposal has an element of 1,2 or 3 bed-room houses;
- 0 = No proposal made regarding house sizes;
- 1 = Proposal has an element of 4,5 or bed-room or larger houses;
- 2 = Proposal is entirely for 4,5 bed-room or larger houses.

9.3.2.3 Policy 3A: Design

- 1) *Proposals shall maintain the residential amenity of neighbouring occupants, and provide adequate levels of residential amenity for future occupants.*

Deterioration of amenity is undesirable and hence scored negatively:

- 2 = Proposal may significantly improve amenity;
- 1 = Proposal may lead to a minor improvement to amenity;
- 0 = Proposal would have neither positive, nor negative impact on amenity;
- 1 = Proposal may lead to a minor deterioration of amenity;
- 2 = Proposal may significantly impact on amenity.

- 2) *Design and layout shall not materially impact the significance of any building defined as a heritage asset or its setting; or if such impact would occur, be justified by a proportionate impact assessment and mitigation proposal.*

- 2 = Proposal may have a very positive impact on the significance of a heritage asset;
- 1 = Proposal may have a small positive impact on the significance of a heritage asset;
- 0 = Proposal would have neither positive, nor negative impact on the significance of a heritage asset;
- 1 = Proposal may have a small negative impact on the significance of a heritage asset;
- 2 = Proposal may have a very negative impact on the significance of a heritage asset.

9.3.2.4 Policy 3B: Density of Residential Developments

- 1) *The density of new residential developments shall not detract from the character and appearance of the immediately surrounding and shall be guided by the data presented in Table 3B.1 (of the policy).*

Area Number	Density Guideline (dwellings per hectare)	Area Number	Density Guideline (dwellings per hectare)
1	13.5	11	16.5
2	12.8	12	12.0
3	7.4	13	22.8
4	18.4	14	7.3
5	11.4	15	7.2
6	12.6	16	8.2
7	16.3	17	8.8
8	7.4	18	6.6
9	7.6	19	12.3
10	11.2	ALL	11.0

Notes:

- a) Area 1 is relevant to sites STNP4 and 7;
- b) Area 3 is relevant to sites STNP11 and 15;
- c) Areas 5 and 8 are relevant to sites STNP12 and 16;
- d) Area 11 is relevant to site STNP9;
- e) Area 15 is relevant to sites STNP3, 10, 13 and 14;
- f) Area 16 is relevant to site STNP2;
- g) Area 18 is relevant to site STNP8;
- h) Area 19 is relevant to sites STNP1, 5 and 6.

2 = Density is within the guideline for its area set out in Table 3B.1 of the Neighbourhood Plan;

1 = Density exceeds the guideline for its area set out in Table 3B.1 of the Neighbourhood Plan, but is within that for an adjacent area;

0 = Density exceeds both the guideline for its area set out in Table 3B.1 of the Neighbourhood Plan, and that for all adjacent areas; but is less than 20 dwellings per hectare;

-1 = Density is greater than 20, but less than or equal to 25 dwellings per hectare;

-2 = Density exceeds 25 dwellings per hectare.

9.3.2.5 Policy 3C: Site Access and On-Site Streets

- 1) *Site access shall be compatible with and link successfully with the local road network and shall not impact on highway safety.*

- a) Visibility as a measure of safety

3 = Satisfactory visibility¹³ exists at the site entrance;

2 = Partial visibility exists at the site entrance and could be satisfactorily improved;

1 = An access point to the site is still to be confirmed, but satisfactory options exist;

0 = Only partial visibility exists at the site entrance and opportunity for satisfactory improvement are limited or non-existent; or no entrance exists at present and only partial visibility could be provided;

-1 = Visibility at the site entrance is / would be unsatisfactory, regardless of any viable improvements.

Note: In assessing access visibility the following is relevant, as taken from Para 2.17, Chapter 2, Vehicular Access to All-Purpose Trunk Roads, Volume 6 Section 2 Part 7 Standard TD 41/95, March 1995: "Visibility splays shall be provided to enable emerging drivers using the direct access to have adequate visibility in each direction to see oncoming traffic in sufficient time to make their manoeuvre safely without influencing the major road traffic speed."

- b) Highway width and footpath availability as a measure of safety

4 = Access would be onto a two-lane highway¹⁴ with a pedestrian footpath on the side of the proposed site;

¹³ Defined as a minimum of 59m in either direction per the Local Highway Authority requirement for vehicles travelling at 60kph (37mph)

¹⁴ Width not less than 5.5m as

- 3 = Access would be onto a two-lane highway with no pedestrian footpath on the side of the proposed site, but which has potential for the addition of a footpath local to the site;
- 2 = Access would be onto a two-lane highway with no pedestrian footpath on the side of the proposed site, and which has no potential for the addition of a footpath local to the site;
- 1 = Access would be onto a single-lane highway¹⁵ with no pedestrian footpath on the side of the proposed site, but which has potential for road widening and the addition of a footpath local to the site;
- 0 = Access would be onto a single-lane highway with no pedestrian footpath on the side of the proposed site, and which has no potential for road widening and/or the addition of a footpath local to the site.

9.3.2.6 Policy 7A: Landscape Character Preservation and Enhancement

1) In general development proposals will be supported where:

a) Their scale, location and design are appropriate to the landscape character and sensitivity (landscape and visual) of the area in which they are located;

2 = Scale and location are highly appropriate to the landscape character and sensitivity of the area in which they are located, or may improve it;

1 = Scale and location are to a degree appropriate to the landscape character and sensitivity of the area in which they are located;

0 = Scale and location are neutral to the landscape character and sensitivity of the area in which they are located;

-1 = Scale and location are to a degree inappropriate to the landscape character and sensitivity of the area in which they are located;

-2 = Scale and location are highly inappropriate to the landscape character and sensitivity of the area in which they are located.

b) They will not have an adverse impact on the key natural, built or historic features of an area's landscape character or the overall composition or quality of the landscape character, particularly if the landscape is currently largely unspoiled by obtrusive or discordant features;

4 = No impact or provides enhancement of landscape character;

3 = Minor impact on an area of low or moderate sensitivity that may be readily mitigated;

2 = Minor impact on an area of high or moderate-high sensitivity that may be readily mitigated;

1 = Significant impact on any area that may be readily mitigated;

0 = Significant impact on any area that may not be readily mitigated.

c) When considered with other recent developments, they do not have an adverse cumulative impact on the local landscape character.

Cumulative impacts can only be assessed once initial rating and rankings has been performed, so this criterion will be considered at that stage, should any provisionally selected sites be grouped such as to have the possibility of cumulative impact.

¹⁵ Width less than 5.5m

9.3.2.7 Policy 7B: Key Views

- 1) *Development proposals shall seek opportunities to preserve, incorporate and where possible enhance the Key Views listed below and shown on Policy Map 7B, and their landscape setting.*
 - a. *Key View 1: West to Saham Hall parkland;*
 - b. *Key View 2: East along Richmond Road to St. George's Church;*
 - c. *Key View 3: South from Hills Road to St. George's Church;*
 - d. *Key View 4: South from Pound Hill across open land towards Saham Mere;*
 - e. *Key View 5: South along Pound Hill to St. George's Church, including the tree canopies that frame this view;*
 - f. *Key View 6: North along Richmond Road to St. George's Church;*
 - g. *Key View 7: South across Broom Hall meadows, including the tree cover in the valley bottom;*
 - h. *Key View 8: North at the Cley Lane village gateway;*
 - i. *Key View 9: West from Ovington Road to Bristow's Mill Tower;*
 - j. *Key View 10: South-west to Threxton Church.*

2 = Potential for significant enhancement of a key view;

1 = Potential for minor enhancement of a key view;

0 = No impact on a key view;

-1 = Some harm to a key view that may be readily mitigated;

-2 = Significant harm to a key view.

9.3.2.8 Policy 7D: Biodiversity and Habitats

- 1) *Proposals which result in an undesirable loss of biodiversity will not normally be permitted.*

2 = Makes a positive net enhancement to biodiversity;

1 = A positive net enhancement of biodiversity is possible, but not yet confirmed;

0 = No net gain or loss of biodiversity;

-1 = A net loss of biodiversity but that may be readily mitigated;

-2 = A net loss of biodiversity that may not be readily mitigated.

9.3.2.9 Policy 8: Surface Water Management and Sewerage Provision

- 1) *A sequential test for sites allocated or reserved in this Plan will only be required if new information has come forward since designation in the Plan.*

The following ranking of sites will effectively form a sequential test that may be further refined if required to distinguish fairly similar sites from one another. This relates to surface water flood risk only, since none of the proposed sites are at risk of river flooding.

2 = Very low or no flood risk;

1 = Low to medium flood risk to part of the site, but not exceeding 25% of the total site area;

0 = Low to medium flood risk to part of the site, exceeding 25% of the total site area;

-1 = High flood risk to part of the site, but not exceeding 25% of the total site area, in combination with any medium or low risk areas;

-2 = High flood risk to part of the site, exceeding 25% of the total site area, in combination with any medium or low risk areas.

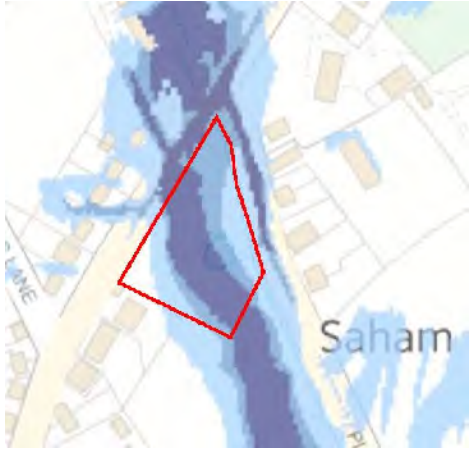
The overall surface water flood risk for the area is given in Figure 8 to provide context. Table 24 shows the surface water flood risk local to each site with summary notes of the risk.



Fig. 10: Environment Agency Surface Water Flood Risk Map for the Area

SITE ID	SITE AREA (ha)	SUGGESTED NUMBER OF DWELLINGS ¹⁶ (CONDITIONED)	SUMMARY OF SURFACE WATER FLOOD RISK	EXTRACT FROM SURFACE WATER FLOOD RISK MAP ¹⁷ Proposed site — Amended site - - -
STNP1	0.98	10 (6)	Low risk over the northern part of the site; very low risk over the remaining area. High risk along the highway to/from which site access would be made	

¹⁶ As put forward by the site proposer
¹⁷ As published online by the Environment Agency

STNP2	0.50	4	Very low risk over the entire site area	
STNP3	0.246	4	A significant part of the site is in high, medium or low risk areas; the south-western section is at very low risk	
STNP4	0.813	12-15	A narrow band at medium/low risk runs north-south across the centre of the site. Page's Lane, immediately to the north of the site is at high/medium risk. Pound Hill, immediately to the east of the site is at medium/low risk. The remainder of the site is at very low risk.	

STNP5	1.014	12-15 (4)	There is a very small area at low risk, otherwise the site is at very low risk	
STNP6	0.46	5-6 (5)	A small area in the north-east corner of the site is at low risk, otherwise the site is at very low risk.	
STNP7	1.86	30-35 (6)	There is a small area at high/medium/low risk at the north-east corner, otherwise the site is at very low risk	
STNP8	2.59	40-50	There is an area at low risk in the middle of the site, otherwise the site is at very low risk. Hills Road, immediately east of the site, is at medium/low risk	

STNP9	0.445	3	The north-east corner is at high risk and there are bands of land at low risk along the western, eastern and southern boundaries. Otherwise the site is at very low risk	
STNP10	1.60	20	Almost the entire site is at high/medium or low risk	
STNP11	0.15	2	A small area at the site entrance is at low risk, as is Richmond Road, immediately north of the site. Otherwise the site is at very low risk	
STNP12	0.24	5	Very low risk over the entire site area	

STNP13	0.20	4-5	Very low risk over the entire site area	
STNP14	0.30	5	Very low risk over the entire site area	
STNP15	0.40	8	A small area at the site entrance is at low risk, as is Richmond Road, immediately north of the site. Otherwise the site is at very low risk	
STNP16	3.48	20-35 (17)	Very low risk over the entire site area	

Table 24: Surface Water Flood Risk for Each Site

10.0 WEIGHTING OF SITE SELECTION RATING CRITERIA

With reference to the policy classes defined in Table 25, the following scale is used for weighting the site selection criteria:

5 = A fundamental aspect of a strategic policy of the Neighbourhood or Local Plans, failure to comply with which, alone, may lead to refusal of a planning application;

4 = A key strategic or major policy consideration with regard to Saham Toney's development constraints¹⁸;

3 = Derived from a major policy, not reflecting any of Saham Toney's key development constraints;

2 = Derived from a minor policy;

1 = A minor consideration.

The rating criteria will be weighted as follows:

CRITERIA	POLICY FROM WHICH CRITERIA IS TAKEN	POLICY CLASS	WEIGHT
Distance to a bus stop	Policy 1 Services, Facilities & Infrastructure	A	3
Distance to services / facilities	Policy 1 Services, Facilities & Infrastructure	A	3
Housing mix versus needs assessment	Policy 2E Housing Mix	A	4
Maintenance of amenity	Policy 3A Design	B	2
Heritage asset setting	Policy 3A Design / Policy 6 Heritage Assets	B	2
Density	Policy 3B Density of Residential Developments	B	2
Highway access - visibility	Policy 3C Site Access and On-Site Access	A	5
Highway access – width and footpaths	Policy 3C Site Access and On-Site Access	A	5
Scale & location versus character area & sensitivity	Policy 7A Landscape Character Preservation and Enhancement	A	4
Impact on landscape character	Policy 7A Landscape Character Preservation and Enhancement	A	4
Preservation / incorporation of key views	Policy 7B Key Views	A	4
No undesirable loss of biodiversity	Policy 7D Biodiversity and Habitats	B	2
Flood risk	Policy 8 Surface Water Management and Sewerage Provision	A	5
Appropriate surface water drainage mitigation measures	Local Plan Policy ENV 09 Flood Risk and Surface Water Drainage	A	3

¹⁸ Defined as flood risk; landscape character and setting; availability of services and facilities; housing need, and roads / public transport

Loss of developed land	Breckland Sustainability Objective 1	C	1
Loss of agricultural land	Breckland Sustainability Objective 1	C	1
Improved quality / quantity of open space	Breckland Sustainability Objective 13	B	2

Table 25. Rating criteria weightings

Notes:

All policies are from the Neighbourhood Plan unless noted otherwise.

Classes assigned to Local Plan policies and sustainability objectives are for the purposes of site selection only, and are chosen to be consistent with those for Neighbourhood Plan policies.

11.0 SITE SELECTION RATINGS

11.1 The rationale for the scoring of each site against each criterion is given in the tables that follow.

TABLE 26, CRITERION: DISTANCE TO A BUS STOP (measured from the approximate centre of each site via the proposed or assumed access point; distances measured on Google Earth)		
Criteria score	Scoring description	
3	Up to 400m, via a paved footpath over all or a large part of the route	
2	Up to 400m, no paved footpath over all or a large part of the route	
1	401 – 800m, via a paved footpath over all or a large part of the route	
0	401 - 800m, no paved footpath over all or a large part of the route	
-1	Over 800m, regardless of footpaths	
SITE NAME	RATING	REASONING FOR RATING
STNP1	1	500m to nearest bus stop, mainly paved footpath
STNP2	-1	390m to school bus stop, no footpath 1100m to nearest public service stop, no footpath
STNP3	-1	210m to school bus stop, no footpath 1435m to nearest public service stop, no footpath
STNP4	3	185m to nearest stop, paved footpath
STNP5	3	200m to nearest stop, paved footpath
STNP6	3	210m to nearest stop, paved footpath
STNP7	3	Bus stop adjacent to site boundary
STNP8	-1	850m to nearest bus stop, no footpath
STNP9	-1	990m to nearest stop, c. 50% paved footpath
STNP10	-1	400m to school bus stop, no footpath 1620m to nearest public service stop, no footpath
STNP11	-1	360m to nearest bus stop, paved footpath
STNP12	1	460m to nearest bus stop, paved footpath
STNP13	-1	550m to school bus stop, no footpath 1770m to nearest public service stop, no footpath
STNP14	-1	500m to school bus stop, no footpath 1720m to nearest public service stop, no footpath
STNP15	3	365m to nearest bus stop, paved footpath
STNP16	1	475m to nearest bus stop, paved footpath

TABLE 27, CRITERION: DISTANCE TO SERVICES / FACILITIES (measured from the approximate centre of each site via the proposed or assumed access point to a central point on Watton High Street (the bus stop); distances measured on Google Earth)

Criteria score	Scoring description	
3	Up to 1000m, with a paved footpath available over all or a large part of the route	
2	Up to 1000m, but with no paved footpath over all or a large part of the route	
1	1001 – 2000m, with a paved footpath available over all or a large part of the route	
0	1000 - 2000m, but with no paved footpath over all or a large part of the route	
-1	Over 2000m, regardless of footpaths	
SITE NAME	RATING	REASONING FOR RATING
STNP1	-1	2.6 km
STNP2	-1	3.4 km
STNP3	-1	3.35 km
STNP4	-1	2.675 km
STNP5	-1	2.7 km
STNP6	-1	2.75 km
STNP7	-1	2.85 km
STNP8	-1	3.15 km
STNP9	0	1.85 km, no footpath over majority of route
STNP10	-1	3.6 km
STNP11	-1	2.27 km
STNP12	1	1.58 km, footpath over whole route
STNP13	-1	3.7 km
STNP14	-1	3.65 km
STNP15	-1	2.28 km
STNP16	1	1.65 km, footpath over whole route

TABLE 28, CRITERION: HOUSING MIX versus HOUSING NEEDS ASSESSMENT

Criteria score	Scoring description	
2	Proposal is entirely for 1, 2 or 3 bed-room houses	
1	Proposal has an element of 1, 2 or 3 bed-room houses	
0	No proposal made regarding house sizes	
-1	Proposal has an element of 4, 5 or bed-room or larger houses;	
-2	Proposal is entirely for 4, 5 bed-room or larger houses	
SITE NAME	RATING	REASONING FOR RATING
STNP1	2	3 bed homes
STNP2	2	3 bed homes
STNP3	2	2 & 3 bed homes
STNP4	2	1-3 bed homes
STNP5	2	1-3 bed homes
STNP6	0	No proposal on house size
STNP7	-1	1-4 bed homes
STNP8	-1	1-4 bed homes
STNP9	-1	2, 3 & 4 bed homes

STNP10	0	No proposal on house size
STNP11	2	3 bed homes
STNP12	-1	1-4 bed homes
STNP13	0	No proposal on house size
STNP14	0	No proposal on house size
STNP15	0	No proposal on house size
STNP16	0	No proposal on house size

TABLE 29, CRITERION: MAINTENANCE OF AMENITY		
Criteria score	Scoring description	
2	Proposal may significantly improve amenity.	
1	Proposal may lead to a minor improvement to amenity.	
0	Proposal would have neither positive, nor negative impact on amenity.	
-1	Proposal may lead to a minor deterioration of amenity.	
-2	Proposal may significantly impact on amenity.	
SITE NAME	RATING	REASONING FOR RATING
STNP1	1	Removal of noise and smell by development on a working piggery will offer some improvement in amenity to neighbouring properties, but on a limited scale as those properties are not immediately adjacent at the site and can only be considered to have minor amenity issues at present
STNP2	0	Although farm buildings would be removed, they are not part of a working farm, so their removal will not improve amenity
STNP3	0	No amenity issues identified by assessment
STNP4	0	No amenity issues identified by assessment
STNP5	0	No amenity issues identified by assessment
STNP6	0	No amenity issues identified by assessment
STNP7	0	Although farm buildings would be removed, they are not in use as part of a working farm, so their removal will not improve amenity
STNP8	-1	Assessment identifies some amenity concerns. These would relate to the potential loss of outlook across the site to the west and dominance
STNP9	0	No amenity issues identified by assessment
STNP10	-2	Assessment highlights potential impact on the amenity of existing properties in Hills Road and Bridge Lane, and nuisance from use of a new access road. Given the proposed size of the site and its location in a quiet area the impact may be significant
STNP11	0	Assessment notes that although amenity impact is unlikely, it would have to be taken into account in development proposals.
STNP12	0	No amenity issues identified by assessment
STNP13	-1	Assessment identified possible impact to new residents from the adjacent working farm
STNP14	0	No amenity issues identified by assessment

STNP15	0	As for STNP11
STNP16	-1	No amenity issues identified by assessment, but the size of the proposed development is likely to result in minor amenity issues for neighbouring properties

TABLE 30, CRITERION: HERITAGE ASSET SETTING IMPACT		
Criteria score	Scoring description	
2	Proposal may have a very positive impact on the significance of a heritage asset.	
1	Proposal may have a small positive impact on the significance of a heritage asset.	
0	Proposal would have neither positive, nor negative impact on the significance of a heritage asset.	
-1	Proposal may have a small negative impact on the significance of a heritage asset.	
-2	Proposal may have a very negative impact on the significance of a heritage asset.	
SITE NAME	RATING	REASONING FOR RATING
STNP1	0	No heritage impact identified by assessment
STNP2	0	No heritage impact identified by assessment
STNP3	0	No heritage impact identified by assessment
STNP4	-1	Assessment identified that mitigation may be required to conserve the significance of a nearby Gr. II listed building
STNP5	0	No heritage impact identified by assessment
STNP6	-1	Assessment identified that mitigation may be required to conserve the significance of a nearby Gr. II listed building
STNP7	-1	Assessment identified that mitigation may be required to conserve the significance of a nearby Gr. II listed building
STNP8	-1	Assessment identified that mitigation may be required to conserve the significance of a nearby Gr. II listed building
STNP9	-1	Assessment identified that mitigation may be required to conserve the significance of a nearby Gr. II listed building
STNP10	0	No heritage impact identified by assessment
STNP11	-1	Assessment identified that mitigation may be required to conserve the significance of a nearby Gr. I listed building
STNP12	0	No heritage impact identified by assessment
STNP13	0	No heritage impact identified by assessment
STNP14	0	No heritage impact identified by assessment
STNP15	-1	Assessment identified that mitigation may be required to conserve the significance of a nearby Gr. I listed building
STNP16	0	No heritage impact identified by assessment

TABLE 31, CRITERION: DENSITY	
Criteria score	Scoring description
2	Density is within the guideline for its area set out in Table 3B.1 of the Neighbourhood Plan
1	Density exceeds the guideline for its area set out in Table 3B.1 of the Neighbourhood Plan, but is within that for an adjacent area
0	Density exceeds both the guideline for its area set out in Table 3B.1 of the Neighbourhood Plan, and that for all adjacent areas; but is less than 20 dwellings per hectare

-1	Density is greater than 20, but less than or equal to 25 dwellings per hectare			
-2	Density exceeds 25 dwellings per hectare			
SITE NAME	RATING	REASONING FOR RATING		
		(A) Site Density	(B) Applicable Area Density	(C) Adjacent Area Density (if A>B)
STNP1	2	10.9	12.3	
STNP2	2	8.0	8.2	
STNP3	0	12.2	7.2	8.8
STNP4	2	12.3	12.8	
STNP5	2	11.4	12.8	
STNP6	2	10.9	12.8	
STNP7	2	12.5	13.5	
STNP8	0	19.3	6.6	8.2
STNP9	2	6.7	16.5	
STNP10	0	12.5	7.2	8.2
STNP11	1	13.3	7.4	18.4
STNP12	-1	20.8	11.4	7.4
STNP13	-1	25	7.2	8.2
STNP14	0	16.7	7.2	8.8
STNP15	1	10.0	7.4	18.4
STNP16	2	11.3	11.4	

TABLE 32, CRITERION: HIGHWAY ACCESS - VISIBILITY		
Criteria score	Scoring description	
3	Satisfactory visibility exists, or has been proposed, at the site entrance	
2	Partial visibility exists at the site entrance and could be satisfactorily improved	
1	An access point to the site is yet to be confirmed, but subject to the application of appropriate conditions, satisfactory visibility could readily be ensured	
0	Only partial visibility exists at the site entrance and opportunities for satisfactory improvement are limited; or no entrance exists at present and it is not readily apparent that the application of conditions would ensure satisfactory visibility	
-1	Visibility at the site entrance is/would be unsatisfactory, regardless of any viable improvements	
SITE NAME	RATING	REASONING FOR RATING
STNP1	2	The access layout submitted with the proposal was reviewed by the Highways Authority under an earlier planning application and deemed acceptable subject to normal conditions
STNP2	2	An access layout submitted with an earlier planning application was reviewed by the Highways Authority and deemed acceptable subject to normal conditions
STNP3	1	No proposal for access has yet been made, but access onto either Hills Road or Ploughboy Lane would be feasible in line with schemes for similar recent planning applications for nearby sites

STNP4	1	No proposal for access has yet been made, but access onto either Pound Hill or Page's Lane would be feasible
STNP5	1	No proposal for access has yet been made, but access onto Pound Hill would be feasible
STNP6	1	No proposal for access has yet been made, but access onto either Pound Hill or Page's Lane would be feasible
STNP7	2	The existing farm entrance could be readily improved to provide satisfactory visibility
STNP8	1	Although there is no proven access scheme, the Highways Authority assessment raised no concerns in this respect
STNP9	3	Access would consist of two private driveways (one shared). A drawing provided with the proposal in this respect has been discussed and agreed by the proposer and the Highways Authority
STNP10	0	The single access point is very narrow and land at the site entrance / exit is not all in the ownership of the site proposer. Unless the proposer can present more information there is doubt about the level of visibility that can be achieved
STNP11	-1	The current driveway access could be improved, but visibility would be limited due to the proximity of a 90° bend in the highway and not possible to satisfactorily improve because of that proximity
STNP12	2	An access layout submitted with an earlier planning application was reviewed by the Highways Authority and deemed acceptable subject improvement and normal conditions
STNP13	1	No proposal for access has yet been made, but access onto Hills Road would be feasible
STNP14	1	No proposal for access has yet been made, but access onto Hills road would be feasible
STNP15	-1	The current driveway access could be improved, but visibility would be limited due to the proximity of a 90° bend in the highway and not possible to satisfactorily improve because of that proximity
STNP16	2	An access layout submitted with an earlier planning application was reviewed by the Highways Authority and deemed acceptable subject improvement and normal conditions

TABLE 33, CRITERION: HIGHWAY ACCESS – HIGHWAY WIDTH & FOOTPATHS	
Criteria score	Scoring description
4	Access would be onto a two-lane highway with a pedestrian footpath on the side of the proposed site
3	Access would be onto a two-lane highway with no pedestrian footpath on the side of the proposed site, but which has potential for the addition of a footpath local to the site
2	Access would be onto a two-lane highway with no pedestrian footpath on the side of the proposed site, and which has no potential for the addition of a footpath local to the site

1	Access would be onto a single-lane highway with no pedestrian footpath on the side of the proposed site, but which has potential for road widening and the addition of a footpath local to the site	
0	Access would be onto a single-lane highway with no pedestrian footpath on the side of the proposed site, and which has no potential for road widening and/or the addition of a footpath local to the site	
SITE NAME	RATING	REASONING FOR RATING
STNP1	3	The access layout submitted with the proposal and deemed acceptable by the Highways Authority under an earlier planning application included a footpath through the site to link with an existing one on Page's Lane. Provision of such a footpath would be a policy criterion if the site is allocated
STNP2	2	Hills Road wide enough for vehicles to pass in opposite directions, but no obvious opportunity to provide a local footpath
STNP3	3	Providing access is onto Hills Road that is wide enough for vehicles to pass in opposite directions, and part of the site could be used to provide a local footpath. Access onto Hills Road, rather than Ploughboy Lane, to be a policy criterion if the site is allocated
STNP4	4	Access to either Pound Hill or Page's Lane would be to a two-lane highway with existing footpath
STNP5	4	Access to Pound Hill would be to a two-lane highway with existing footpath
STNP6	4	Access to Pound Hill would be to a two-lane highway with existing footpath
STNP7	3	Access to Page's Lane would be to a two-lane highway with opportunity to provide a footpath using land forming part of the site. Provision of such a footpath would be a policy criterion if the site is allocated
STNP8	3	Access to Hills Road would be to a two-lane highway with opportunity to provide a footpath using land forming part of the site. Provision of such a footpath would be a policy criterion if the site is allocated
STNP9	3	Access would consist of two private driveways (one shared) onto Ovington Road at a point where it is wide enough for vehicles to pass in both directions. A drawing provided with the proposal in this respect has been discussed and agreed by the proposer and the Highways Authority and includes a footpath along the site frontage. Provision of such a footpath would be a policy criterion if the site is allocated
STNP10	2	Hills Road wide enough for vehicles to pass in opposite directions, but no obvious opportunity to provide a local footpath
STNP11	4	Access to Richmond Road would be to a two-lane highway with existing footpath
STNP12	3	Access to Richmond Road would be to a two-lane highway without a footpath, but provision of a suitable footpath is a condition of an existing permission for an adjacent site

STNP13	1	Access onto Hills Road can be provided to include local road widening and a footpath on land forming part of the site
STNP14	1	Access onto Hills Road can be provided to include local road widening and a footpath on land forming part of the site
STNP15	4	Access to Richmond Road would be to a two-lane highway with existing footpath
STNP16	3	Access to Richmond Road would be to a two-lane highway without a footpath, but provision of a suitable footpath is a condition of an existing permission for an adjacent site

TABLE 34, CRITERION: SCALE & LOCATION versus CHARACTER & SENSITIVITY		
Criteria score	Scoring description	
2	Scale and location are highly appropriate to the landscape character and sensitivity of the area in which they are located.	
1	Scale and location are to a degree appropriate to the landscape character and sensitivity of the area in which they are located	
0	Scale and location are neutral to the landscape character and sensitivity of the area in which they are located.	
-1	Scale and location are to a degree inappropriate to the landscape character and sensitivity of the area in which they are located.	
-2	Scale and location are highly inappropriate to the landscape character and sensitivity of the area in which they are located.	
SITE NAME	RATING	REASONING FOR RATING
STNP1	1	The site conditioning limits the development footprint to that of the existing brownfield area. As such the new proposed single level dwellings will have less impact than the larger existing farm buildings but a site protecting back from the highway is somewhat out of keeping with the local character
STNP2	2	This is a brownfield site. As such the new proposed single level dwellings will have less impact than the larger disused farm buildings
STNP3	0	The proposal is for four new homes which could be expected to readily “blend in” but the site is an area of character value as identified by the Saham Toney Parish Landscape Assessment
STNP4	0	Development size has been scaled down from that proposed by conditioning. If set out sensitively the site would neither enhance nor harm landscape character. To justify the rating that shall be a condition of a policy if this site is allocated
STNP5	0	Development size has been scaled down from that proposed and limited to the least sensitive area by conditioning. If set out sensitively the site would neither enhance nor harm landscape character. To justify the rating that shall be a condition of a policy if this site is allocated
STNP6	0	The site itself is not in a sensitive location, although the overall character is highly sensitive visually. To justify the

		rating a condition of a policy if this site is allocated shall be that is designed and set out to avoid impact
STNP7	1	The site conditioning limits the development footprint to that of the existing brownfield area. As such the new proposed single level dwellings will have less impact than the larger disused farm buildings, but a site protecting back from the highway is somewhat out of keeping with the local character
STNP8	-2	The size of the proposed development would be out of keeping with the character of the neighbouring area, and indeed with most of the village
STNP9	0	The proposal is for three new homes between existing development and so could be expected to readily “blend in”
STNP10	-1	Although this would be a large development it would be visible only to residents of neighbouring properties which would mitigate its impact
STNP11	0	A development of two dwellings could be expected to readily “blend in” in with the surrounding built form in landscape terms
STNP12	-1	This would be a small development and quite well screened from wider view, but would tend to jut out into open countryside
STNP13	0	Being a small-scale development on the edge of the existing settlement a neutral effect would be expected
STNP14	0	Being a small-scale development on the edge of the existing settlement a neutral effect would be expected
STNP15	0	While the development might “blend in” in with the surrounding built form in landscape terms, a cluster of up to 8 dwellings would be somewhat out of keeping with the existing built form and would need significant mitigation. To justify the rating site capacity is reduced to 4 dwellings
STNP16	-1	Although scaled down in size compared to the proposal, the site would be a cluster of dwellings in an area of “ribbon” development so would need to be carefully set out to mitigate impact. To justify the rating a condition of a policy if this site is allocated shall be that is designed and set out to avoid /mitigate impact

TABLE 35, CRITERION: IMPACT ON LANDSCAPE CHARACTER		
Criteria score	Scoring description	
4	No impact or provides enhancement of landscape character	
3	Minor impact on an area of low or moderate sensitivity that may be readily mitigated	
2	Minor impact on an area of high or moderate-high sensitivity that may be readily mitigated	
1	Significant impact on any area that may be readily mitigated	
0	Significant impact on any area that may not be readily mitigated	
SITE NAME	RATING	REASONING FOR RATING
STNP1	4	The site conditioning limits the development footprint to that of the existing brownfield area. Sympathetically

		designed dwellings in accord with the Village Design Guide could be expected to be an improvement on the present farm buildings
STNP2	4	This is a brownfield site. Sympathetically designed dwellings in accord with the Village Design Guide could be expected to be an improvement on the present disused farm buildings
STNP3	1	Although the site is a rather unattractive and overgrown field, the Village Landscape Assessment identifies it as being of a sub-area type that has some value
STNP4	1	Development size has been scaled down a little from that proposed by conditioning, but the site is in area of high visual sensitivity and forms one of the gaps between existing settlement clusters which are identified as of primary importance to maintaining the character of Saham toney in the Parish Landscape Character Assessment. Mitigation may be possible but would be highly dependent on the site layout, which is as yet unknown. A condition of a policy if this site is allocated shall be that is designed and set out to minimise impact
STNP5	2	Development size has been scaled down from that proposed and limited to the least sensitive area by conditioning. If set out sensitively the site would neither enhance nor harm landscape character. To justify the rating that shall be a condition of a policy if this site is allocated
STNP6	2	The site itself is not in a sensitive location, although the overall character is highly sensitive visually. To justify the rating a condition of a policy if this site is allocated shall be that is designed and set out to avoid impact
STNP7	4	The site conditioning limits the development footprint to that of the existing brownfield area. Sympathetically designed dwellings in accord with the Village Design Guide could be expected to be an improvement on the present farm buildings
STNP8	0	The size of the proposed development and its infringement of a key view indicates there would be significant landscape character impact
STNP9	3	The outline drawings show a sympathetic approach which will have no particular impact on landscape and the proposal is for very small-scale development
STNP10	1	Although the site is a rather unattractive and overgrown field, the Village Landscape Assessment identifies it as being of a sub-area type that has some value
STNP11	3	A development of two dwellings could be expected to readily “blend in” in with the surrounding built form in landscape terms
STNP12	1	This would be a small development in an area of moderate landscape sensitivity and quite well screened from wider view, but is somewhat contrary to the Parish Landscape Character Assessment findings

STNP13	3	Being a small-scale development on the edge of the existing settlement a neutral effect would be expected
STNP14	3	Being a small-scale development on the edge of the existing settlement a neutral effect would be expected
STNP15	1	While the development might “blend in” in with the surrounding built form in landscape terms, a cluster of up to 8 dwellings would be somewhat out of keeping with the existing built form and would require significant mitigation
STNP16	1	Although scaled down in size compared to the proposal, there is potential for landscape impact, particularly in long distance outlook views from the north. To justify the rating a condition of a policy if this site is allocated shall be that is designed and set out to avoid /mitigate impact

TABLE 36, CRITERION: PRESERVE / INCORPORATE KEY VIEWS		
Criteria score	Scoring description	
2	Potential for significant enhancement of a key view.	
1	Potential for minor enhancement of a key view.	
0	No impact on a key view.	
-1	Some harm to a key view that may be readily mitigated.	
-2	Significant harm to a key view.	
SITE NAME	RATING	REASONING FOR RATING
STNP1	1	By virtue of site conditioning limiting development to the brownfield footprint, new single storey dwellings may enhance the long-distance view from Hills Road across the site towards Saham Mere and Watton
STNP2	0	No key views in the site area
STNP3	0	No key views in the site area
STNP4	0	No key views in the site area
STNP5	-1	Potential impact on a key view from Pound Hill towards Saham Mere largely mitigated by site conditioning limiting development to the northern part of the proposed site
STNP6	0	Providing perimeter hedges and trees are retained, the key view south from Hills Road would not be affected. To justify the rating this shall be a condition of a policy if this site is allocated
STNP7	0	The site forms part of the backdrop of a key view from Hills Road towards Page’s Place, although by virtue of site conditioning limiting development to the brownfield footprint, sympathetically designed dwellings in accord with the Village Design Guide may enhance that view. This shall be a condition of a policy if this site is allocated
STNP8	-2	The proposed development would severely harm / destroy a key view from Hills Road south towards Page’s Place
STNP9	0	While near to a key view of Bristow/s Mill Tower, development would not impinge on that view
STNP10	0	No key views in the site area

STNP11	0	No key views in the site area
STNP12	0	No key views in the site area
STNP13	0	No key views in the site area
STNP14	0	No key views in the site area
STNP15	0	No key views in the site area
STNP16	0	No key views in the site area

TABLE 37, CRITERION: NO UNDESIRABLE LOSS OF BIODIVERSITY		
Criteria score	Scoring description	
2	Makes a positive net enhancement to biodiversity.	
1	A positive net enhancement of biodiversity is possible, but not yet confirmed.	
0	No net gain or loss of biodiversity.	
-1	A net loss of biodiversity but that may be readily mitigated.	
-2	A net loss of biodiversity that may not be readily mitigated.	
SITE NAME	RATING	REASONING FOR RATING
STNP1	-1	Farm buildings may provide habitats for bats, owls, etc. Could be mitigated by biodiversity friendly measures designed into new houses and gardens, but that may not outweigh loss of farm building habitats. To offset the rating, it will be a policy condition that development enhances biodiversity if the site is selected as an allocated site
STNP2	-1	Farm buildings may provide habitats for bats, owls, etc. Could be mitigated by biodiversity friendly measures designed into new houses and gardens, but that may not outweigh loss of farm building habitats. To offset the rating, it will be a policy condition that development enhances biodiversity if the site is selected as an allocated site
STNP3	-1	Loss of greenfield land which could be mitigated by biodiversity friendly measures designed into new houses and gardens
STNP4	-1	Loss of greenfield land which could be mitigated by biodiversity friendly measures designed into new houses and gardens
STNP5	-1	Loss of greenfield land which could be mitigated by biodiversity friendly measures designed into new houses and gardens
STNP6	-1	Loss of greenfield land which could be mitigated by biodiversity friendly measures designed into new houses and gardens
STNP7	-1	Farm buildings may provide habitats for bats, owls, etc. Could be mitigated by biodiversity friendly measures designed into new houses and gardens, but that may not outweigh loss of farm building habitats. To offset the rating, it will be a policy condition that development enhances biodiversity if the site is selected as an allocated site
STNP8	0	Currently arable field of low biodiversity value and where minor impact can be offset by the likelihood of more green space in a residential development

STNP9	-1	Loss of greenfield land which could be mitigated by biodiversity friendly measures designed into new houses and gardens
STNP10	-2	Loss of greenfield land on a large scale
STNP11	-1	Loss of greenfield land which could be mitigated by biodiversity friendly measures designed into new houses and gardens
STNP12	-1	Loss of greenfield land which could be mitigated by biodiversity friendly measures designed into new houses and gardens
STNP13	-1	Loss of greenfield land which could be mitigated by biodiversity friendly measures designed into new houses and gardens
STNP14	0	Currently arable field of low biodiversity value and where minor impact can be offset by the likelihood of more green space in a residential development
STNP15	-1	Loss of greenfield land which could be mitigated by biodiversity friendly measures designed into new houses and gardens
STNP16	-1	Loss of largely greenfield land, and demolition of outbuildings may result in habitat loss for bats, owls etc which could be mitigated by biodiversity friendly measures designed into new houses and gardens

TABLE 38, CRITERION: FLOOD RISK – SEQUENTIAL TEST		
Criteria score	Scoring description	
2	Very low or no flood risk.	
1	Low to medium flood risk to part of the site, but not exceeding 25% of the total site area.	
0	High flood risk to part of the site, but not exceeding 25% of the total site area, in combination with any medium or low risk areas.	
-1	High flood risk to part of the site, but not exceeding 25% of the total site area, in combination with any medium or low risk areas	
-2	High flood risk to part of the site, exceeding 25% of the total site area, in combination with any medium or low risk areas.	
SITE NAME	RATING	REASONING FOR RATING
STNP1	1	Refer to flood risk maps for all sites in section 8.3.2.9 In the case of STNP8 account has also been taken of the existing level of surface water run-off onto land immediately south of the site, which has previously contributed to flooding of that land, and which would increase as a result of developing the site
STNP2	2	
STNP3	-2	
STNP4	1	
STNP5	1	
STNP6	1	
STNP7	1	
STNP8	-1	
STNP9	-1	
STNP10	-2	
STNP11	2	
STNP12	2	

STNP13	2	
STNP14	2	
STNP15	1	
STNP16	2	

TABLE 39, CRITERION: APPROPRIATE SURFACE WATER DRAINAGE MITIGATION MEASURES		
Criteria score	Scoring description	
4	No requirement for mitigation.	
3	Mitigation measures likely to be on a small scale and straightforward.	
2	Mitigation measures on a larger scale, but still straightforward.	
1	Mitigation measures possible but unlikely to be straightforward.	
0	Mitigation measures unlikely to be practical.	
SITE NAME	RATING	REASONING FOR RATING
STNP1	3	Minor risk that could be mitigated by SuDS and swales or similar
STNP2	4	No flood risk therefore no mitigation required
STNP3	0	Lead Local Flood Authority assessment identified that significant mitigation would be required for severe constraints and recommend development of the site does not go ahead
STNP4	3	Minor risk that could be mitigated by SuDS
STNP5	3	Minor risk that could be mitigated by SuDS
STNP6	3	Minor risk that could be mitigated by SuDS and swales or similar
STNP7	2	Risk could be mitigated by SuDS and flow attenuation
STNP8	2	On-site risk could be mitigated by SuDS, but off-site run-off to the south would require more complex measures
STNP9	3	Risk could be mitigated by SuDS and flow attenuation
STNP10	0	Lead Local Flood Authority assessment identified that significant mitigation would be required for severe constraints and recommend development of the site does not go ahead
STNP11	4	No flood risk therefore no mitigation required
STNP12	4	No flood risk therefore no mitigation required
STNP13	4	No flood risk therefore no mitigation required
STNP14	4	No flood risk therefore no mitigation required
STNP15	3	Minor risk that could be mitigated by SuDS
STNP16	4	No flood risk therefore no mitigation required

TABLE 40, CRITERION: LOSS OF UNDEVELOPED LAND	
Criteria score	Scoring description
4	No loss of undeveloped land (i.e. site entirely brownfield)
3	The undeveloped land that would be lost comprises no more than 25% of the total area of the potential site

2	The undeveloped land that would be lost comprises between 26% and 50% of the total area of the potential site	
1	The undeveloped land that would be lost comprises between 51% and 75% of the total area of the potential site	
0	The site is entirely greenfield	
SITE NAME	RATING	REASONING FOR RATING
STNP1	3	Site conditioned to be limited to brownfield footprint, but provision of access will result in some loss
STNP2	3	Site is almost entirely brownfield, but development will result in the loss of some green land
STNP3	0	Greenfield site
STNP4	0	Greenfield site
STNP5	0	Greenfield site
STNP6	0	Greenfield site
STNP7	3	Site conditioned to be limited to predominantly brownfield footprint
STNP8	0	Greenfield site
STNP9	0	Greenfield site
STNP10	0	Greenfield site
STNP11	0	Greenfield site
STNP12	0	Greenfield site
STNP13	0	Greenfield site
STNP14	0	Greenfield site
STNP15	1	Mainly residential garden but existing dwelling would be demolished
STNP16	1	Mainly residential garden but existing dwelling would be demolished

TABLE 41, CRITERION: LOSS OF AGRICULTURAL LAND		
Criteria score	Scoring description	
2	No loss of agricultural land	
1	The agricultural land that would be lost is of grade 3b or lower and comprises an area less than 20 hectares;	
0	The agricultural land that would be lost is of grade 3b or lower and comprises an area greater than or equal to than 20 hectares;	
-1	The agricultural land that would be lost is of grade 3a or higher and comprises an area less than 20 hectares;	
-2	The agricultural land that would be lost is of grade 3a or higher and comprises an area greater than or equal to than 20 hectares	
SITE NAME	RATING	REASONING FOR RATING
STNP1	1	Grade 3b land < 20ha
STNP2	1	Grade 3b land < 20ha
STNP3	1	Grade 3b land < 20ha
STNP4	1	Grade 3b land < 20ha
STNP5	1	Grade 3b land < 20ha
STNP6	1	Grade 3b land < 20ha
STNP7	-1	Grade 3a land < 20ha

STNP8	-1	Grade 3a land < 20ha
STNP9	1	Grade 3b land < 20ha
STNP10	1	Grade 3b land < 20ha
STNP11	2	No loss of agricultural land
STNP12	2	No loss of agricultural land
STNP13	2	No loss of agricultural land
STNP14	-1	Grade 3a land < 20ha
STNP15	2	No loss of agricultural land
STNP16	2	No loss of agricultural land

TABLE 42, CRITERION: IMPROVE QUALITY / QUANTITY OF OPEN SPACE		
Criteria score	Scoring description	
2	The site offers significant potential to improve the quality or quantity of accessible open space.	
1	The site offers some potential to improve the quality or quantity of accessible open space.	
0	The site would neither improve nor reduce the quality or quantity of accessible open space.	
-1	The site would make a minor reduction to the quality or quantity of accessible open space.	
-2	The site would make a significant reduction to the quality or quantity of accessible open space.	
SITE NAME	RATING	REASONING FOR RATING
STNP1	0	Brownfield site would be replaced by residential dwellings: no opportunity to change green space
STNP2	0	Brownfield site would be replaced by residential dwellings: no opportunity to change green space
STNP3	0	Greenfield site currently not accessible. Unlikely to be potential opportunities for improvement given the small scale of the site
STNP4	0	Greenfield site currently not accessible. Unlikely to be potential opportunities for improvement given the small scale of the site
STNP5	0	Greenfield site currently not accessible. Small residential development would not offer potential opportunities for improvement
STNP6	0	Greenfield site currently not accessible. Small residential development would not offer potential opportunities for improvement
STNP7	0	Brownfield site would be replaced by residential dwellings: no opportunity to change green space
STNP8	1	Greenfield site currently not accessible. Landscaping offers potential opportunities for improvement
STNP9	0	Greenfield site currently not accessible. Development would be entirely residential: no opportunity to change green space
STNP10	0	Greenfield site currently not accessible. Development would be entirely residential: no opportunity to change green space
STNP11	0	Residential garden not publicly accessible would be replaced by 2 new dwellings similarly not accessible

STNP12	0	Residential garden not publicly accessible would be replaced by 5 new dwellings similarly not accessible
STNP13	0	Greenfield site currently not accessible. Small residential development would not offer potential opportunities for improvement
STNP14	0	Greenfield site currently not accessible. Small residential development would not offer potential opportunities for improvement
STNP15	0	Residential garden not publicly accessible would be replaced by 4-8 new dwellings similarly not accessible
STNP16	2	Greenfield site currently not accessible. Landscaping offers potential opportunities for improvement. Additionally, proposal offers other public amenity land on a significant scale, as shown in Figure A17 (to be a policy criterion if the site is selected)

11.2 The ratings described in section 11.1 for each site against each criterion are summarised in Table 43.

11.3 Table 44 presents the overall scores after the application of criteria weightings and shows the site rankings that result.

Table 43: Rating of Sites Against Selection Criteria	No of Houses Proposed	Site area (ha)	Site density (dph)	Distance to a bus stop	Distance to services / facilities	Housing mix vs Needs Assessment	Maintain amenity	Heritage asset setting	Density	Highway access - visibility	Highway access - width & footpaths	Scale & location vs character area & sensitivity	Impact on landscape character	Preserve / incorporate key views	No undesirable loss of biodiversity	Flood risk - sequential test	Appropriate surface water drainage mitigation measures	Loss of undeveloped land	Loss of agricultural land	Improve quality / quantity of open space
POLICY				1		2D	3A		3B	3C		7A		7B	7D	8	ENV09	OBJECTIVE		
CRITERIA				1a	1b	1	1	2	1	1a	1b	1a	1b	1	1	1	2	1a	1b	13
WEIGHT				3	3	4	2	2	2	5	5	4	4	4	2	5	3	1	1	2
SITE ID ↓	Max possible score			3	3	2	2	2	2	3	4	2	4	2	2	2	4	4	2	2
STNP1	6	0.55	10.9	1	-1	2	1	0	2	2	3	1	4	1	-1	1	3	3	1	0
STNP2	4	0.5	8.0	-1	-1	2	0	0	2	2	2	2	4	0	-1	2	4	3	1	0
STNP3	3	0.246	12.2	-1	-1	2	0	0	0	1	3	0	1	0	-1	-2	0	0	1	0
STNP4	10	0.813	12.3	3	-1	2	0	-1	2	1	4	0	1	0	-1	1	3	0	1	0
STNP5	4	0.35	11.4	3	-1	2	0	0	2	1	4	0	2	-1	-1	1	3	0	1	0
STNP6	5	0.46	10.9	3	-1	0	0	-1	2	1	4	0	2	0	-1	1	3	0	1	0
STNP7	6	0.48	12.5	3	-1	-1	0	-1	2	2	3	1	4	0	-1	1	2	3	-1	0
STNP8	50	2.59	19.3	-1	-1	-1	-1	-1	0	1	3	-2	0	-2	0	-1	2	0	-1	1
STNP9	3	0.445	6.7	-1	0	-1	0	-1	2	3	3	0	3	0	-1	-1	3	0	1	0
STNP10	20	1.6	12.5	-1	-1	0	-2	0	0	0	2	-1	1	0	-2	-2	0	0	1	0
STNP11	2	0.15	13.3	3	-1	2	0	-1	1	-1	4	0	3	0	-1	2	4	0	2	0
STNP12	5	0.24	20.8	1	1	-1	0	0	-1	2	3	-1	1	0	-1	2	4	0	2	0
STNP13	5	0.2	25.0	-1	-1	0	-1	0	-1	1	1	0	3	0	-1	2	4	0	2	0
STNP14	5	0.3	16.7	-1	-1	0	0	0	0	1	1	0	3	0	0	2	4	0	-1	0
STNP15	4	0.4	10.0	3	-1	0	0	-1	1	-1	4	0	1	0	-1	1	3	1	2	0
STNP16	17	1.5	11.3	1	1	0	-1	0	2	2	3	-1	1	0	-1	2	4	1	2	2

Subject to owners' provision of satisfactory mitigations

Neighbourhood Plan policy criteria

Local Plan Policy criterion

Local Plan sustainability objective

WEIGHTED RESULTS TABLE		
SITE ID	SCORE	HOUSES
STNP1	79	6
STNP2	74	4
STNP3	15	3
STNP4	58	10
STNP5	60	4
STNP6	54	5
STNP7	60	6
STNP8	-8	50
STNP9	40	3
STNP10	-13	20
STNP11	63	2
STNP12	47	5
STNP13	34	5
STNP14	37	5
STNP15	40	4
STNP16	60	17
Max possible score = 104		

RANKED RATINGS	
SITE ID	SCORE
STNP1	79
STNP2	74
STNP11	63
STNP5	60
STNP7	60
STNP16	60
STNP4	58
STNP6	54
STNP12	47
STNP9	40
STNP15	40
STNP14	37
STNP13	34
STNP3	15
STNP8	-8
STNP10	-13

Subject to owners' provision of satisfactory mitigations

Table 44: Weighted Results Table and Site Rankings

12.0 PROVISIONAL PRE-SUBMISSION SITE SELECTION

12.1 In section 11, the selection criteria described in section 9 have been scored using the 1-5 scale rating system given in that section and the results tabulated. The criteria weightings identified in section 10 have been applied to those results to establish an overall score for each site.

12.2 All sixteen sites identified in Table 21 as potentially suitable for selection have been rated, but sites STNP3, STNP8, STNP10, STNP11 and STNP15 may only be selected if the site proposers provide evidence of acceptable mitigations for the significant constraints noted in Tables 19 and 20.

12.3 Site pairs STNP11 / 15 and STNP12 / 16 are options and only the best rated site of each pair may be selected, if suitable and highly enough rated. On this basis sites STNP12 and STNP15 are excluded from further consideration as they score lower than sites STNP16 and STNP11 respectively.

12.4 The weighted site rankings for the sites are given in Table 45. Unless and until evidence of mitigations for significant constraints is provided by the site proposers, sites STNP3, STNP8, STNP10, STNP11 and STNP15 are not considered in the following provisional site selection. Sites with an overall zero or negative rating may not be allocated.

SITE RANKINGS		
	Subject to owners' provision of satisfactory mitigations	
SITE ID	HOUSES	SCORE
STNP1	6	79
STNP2	4	74
STNP11	2	63
STNP5	4	60
STNP7	6	60
STNP16	17	60
STNP4	10	58
STNP6	5	54
STNP12	5	47
STNP9	3	40
STNP15	4	36
STNP14	5	37
STNP13	5	34
STNP3	3	15
STNP8	50	-8
STNP10	20	-13

Table 45: Weighted Site Rankings

12.5 As set out in section 4, the Saham Toney Neighbourhood Plan seeks to allocate a minimum of 48 residential dwellings over the Plan period. In order of ranking, sites STNP1, STNP2, STNP11 (providing its remaining highways constraint is overcome), STNP5, STNP7, STNP16 and STNP4, as conditioned, have the potential to deliver a combined total of 49 dwellings and thus are sufficient to satisfy that allocation.

12.6 Although, in order of ranking, sites STNP6, STNP12¹⁹, STNP9, STNP14, STNP15²⁰ and STNP13 score somewhat lower, the criteria ratings show them to be sustainable, and subject to the constraint conditioning described for each, they are also suitable for development and so will also be included in the Neighbourhood Plan as allocated sites. This is demonstrated by an analysis of the differences in weighted ratings between the lowest ranked site that satisfies the minimum housing allocation (STNP4, weighted score 58) and each of the sites STNP6 (weighted score 54), STNP12 (weighted score 47), STNP9 (weighted score 40), STNP15 (weighted score 40), STNP14 (weighted score 37), and STNP13 (weighted score 37);

Although site STNP3 also scores positively, it has an unresolved constraint that relates to a fundamental factor that prevents it being deemed sustainable unless that constraint is satisfactorily mitigated (flood risk) and will only be considered further should that constraint be mitigated.

Table 46 gives the criteria ratings from which the weighted scores for the sites in question were calculated. Table 47 compares the weighted ratings for STNP6, STNP9, STNP12, STNP13, STNP14 and STNP15 with those for STNP4. In Table 47 green shaded cells indicate a criterion for which STNP4 scores better than the lower ranked sites, but for which conditioning via policy criteria would justify an improved / equivalent rating for the lesser ranked sites in question. Those conditions would be as follows:

12.6.1 STNP6

- a) Housing mix versus needs assessment: Dwellings to be a mix of 1, 2 and 3 bedrooms to satisfy local housing need;

12.6.2 STNP9

- a) Housing mix versus needs assessment: Since the proposal is for only 3 houses, one each of 2, 3 and 4 bedrooms, the site may be considered to satisfy local housing need;
- b) Highway access – width and footpaths: Provision of a paved footpath along the site frontage with the written agreement of the Local Highway Authority;
- c) Flood Risk Sequential Test: As part of a flood risk assessment, a full description with drawings of a solution to attenuate and mitigate flood risk both within and outside the site, with the written agreement of the Lead Local Flood Authority.

12.6.3 STNP12

- a) Housing mix versus needs assessment: Dwellings to be a mix of 1, 2 and 3 bedrooms to satisfy local housing need;
- b) Highway access – width and footpaths: Provision of a paved footpath from the site entrance to the existing footpath to the north, with the written agreement of the Local Highway Authority

¹⁹ Alternate to STNP16 and would only be allocated if that were not

²⁰ Alternate to STNP11 and would only be allocated if that were not

12.6.4 STNP13

- a) Housing mix versus needs assessment: Dwellings to be a mix of 1, 2 and 3 bedrooms to satisfy local housing need;
- b) Amenity: Demonstration in a Design and Access Statement that the adjacent working farm will not negatively impact the amenity of the residents of the new dwellings;
- c) Density: A reduction in site density, to be achieved by suitably increasing the site area (to be achieved by discussion with the site owner);
- d) Highway access – width and footpaths: Provision in a Design and Access Statement of detailed drawings showing road widening / passing places and a footpath along the site frontage, with the written agreement of the Local Highway Authority.

12.6.5 STNP14

- a) Housing mix versus needs assessment: Dwellings to be a mix of 1, 2 and 3 bedrooms to satisfy local housing need;
- b) Density: A reduction in site density, to be achieved by suitably increasing the site area (to be achieved by discussion with the site owner);
- c) Highway access – width and footpaths: Provision in a Design and Access Statement of detailed drawings showing road widening / passing places and a footpath along the site frontage, with the written agreement of the Local Highway Authority.

12.6.6 STNP15

- a) Housing mix versus needs assessment: Dwellings to be a mix of 1, 2 and 3 bedrooms to satisfy local housing need;
- b) Highway access – visibility: Provision in a Design and Access Statement of detailed drawings of satisfactory visibility splays at the site access point with the written agreement of the Local Highway Authority;

12.7 It can be seen from Table 47 that the measures outlined above would serve to eliminate the differences in weighted rankings between STNP4 and the five lower ranked sites.

12.8 This conditioning exercise is not intended to demonstrate that sites STNP6, STNP9, STNP12, STNP13, STNP14 and STNP15 are more suitable than those sites listed in 12.5. But it does demonstrate that with appropriate conditions imposed their ratings would be no lower than the lowest ranked site listed in 12.5 (STNP4) and that therefore they also warrant being included in the Plan as allocated sites.

12.9 The unresolved constraints for sites STNP3, 8, 10, 11 and 15 preclude them from being allocated in the Neighbourhood Plan. Should the site proposers put forward acceptable mitigations to those constraints, supported by robust evidence, this will be reconsidered. See section 15.

12.10 Sites provisionally allocated subject to final agreement with site proposers and formal public consultation are shown in Figure 9.

CRITERION	Distance to a bus stop	Distance to services / facilities	Housing mix vs Needs Assessment	Maintain amenity	Heritage asset setting	Density	Highway access - visibility	Highway access - width & footpaths	Scale & location vs character area & sensitivity	Impact on landscape character	Preserve / incorporate key views	No undesirable loss of biodiversity	Flood risk - sequential test	Appropriate surface water drainage mitigation measures	Loss of undeveloped land	Loss of agricultural land	Improve quality / quantity of open space
WEIGHT	3	3	4	2	2	2	5	5	4	4	4	2	5	3	1	1	2
STNP4 ²¹	3	-1	2	0	-1	2	1	4	0	1	0	-1	1	3	0	1	0
STNP6	3	-1	0	0	-1	2	1	4	0	2	0	-1	1	3	0	1	0
STNP9	-1	0	-1	0	-1	2	3	3	0	3	0	-1	-1	3	0	1	0
STNP12	1	1	-1	0	0	-1	2	3	-1	1	0	-1	2	4	0	2	0
STNP13	-1	-1	0	-1	0	-1	1	1	0	3	0	-1	2	4	0	2	0
STNP14	-1	-1	0	0	0	0	1	1	0	3	0	0	2	4	0	-1	0
STNP15	3	-1	0	0	-1	1	-1	4	-1	1	0	-1	1	3	1	2	0

Table 46: Criteria Ratings for Sites STNP1, STNP4, STNP6, STNP9, STNP12, STNP13 and STNP14

²¹ Lowest rated site needed to satisfy the minimum housing target set by the Neighbourhood Plan (48)

Weighted criteria ratings compared with STNP4 (+ result indicates STNP4 scores better)																		
CRITERIA	Distance to a bus stop	Distance to services / facilities	Housing mix vs Needs Assessment	Maintain amenity	Heritage asset setting	Density	Highway access - visibility	Highway access - width & footpaths	Scale & location vs character area & sensitivity	Impact on landscape character	Preserve / incorporate key views	No undesirable loss of biodiversity	Flood risk - sequential test	Appropriate surface water drainage mitigation measures	Loss of undeveloped land	Loss of agricultural land	Improve quality / quantity of open space	
	STNP4 - STNP6	0	0	8	0	0	0	0	0	-4	0	0	0	0	0	0	0	4
	STNP4 - STNP9	12	-3	12	0	0	0	-10	5	0	-8	0	0	10	0	0	0	18
	STNP4 - STNP12	6	-6	12	0	-2	6	-5	5	4	0	0	0	-5	-3	0	-1	11
	STNP4 - STNP13	12	0	8	2	-2	6	0	15	0	-8	0	0	-5	-3	0	-1	24
	STNP4 - STNP14	12	0	8	0	-2	4	0	15	0	-8	0	-2	-5	-3	0	2	21
	STNP4 - STNP15	0	0	8	0	0	2	10	0	0	0	0	0	0	0	-1	-1	18
	TOTAL																	

Table 47: Weighted Criteria Ratings for STNP6, STNP9, STNP12, STNP13, STNP14 and STNP15 Compared with STNP4

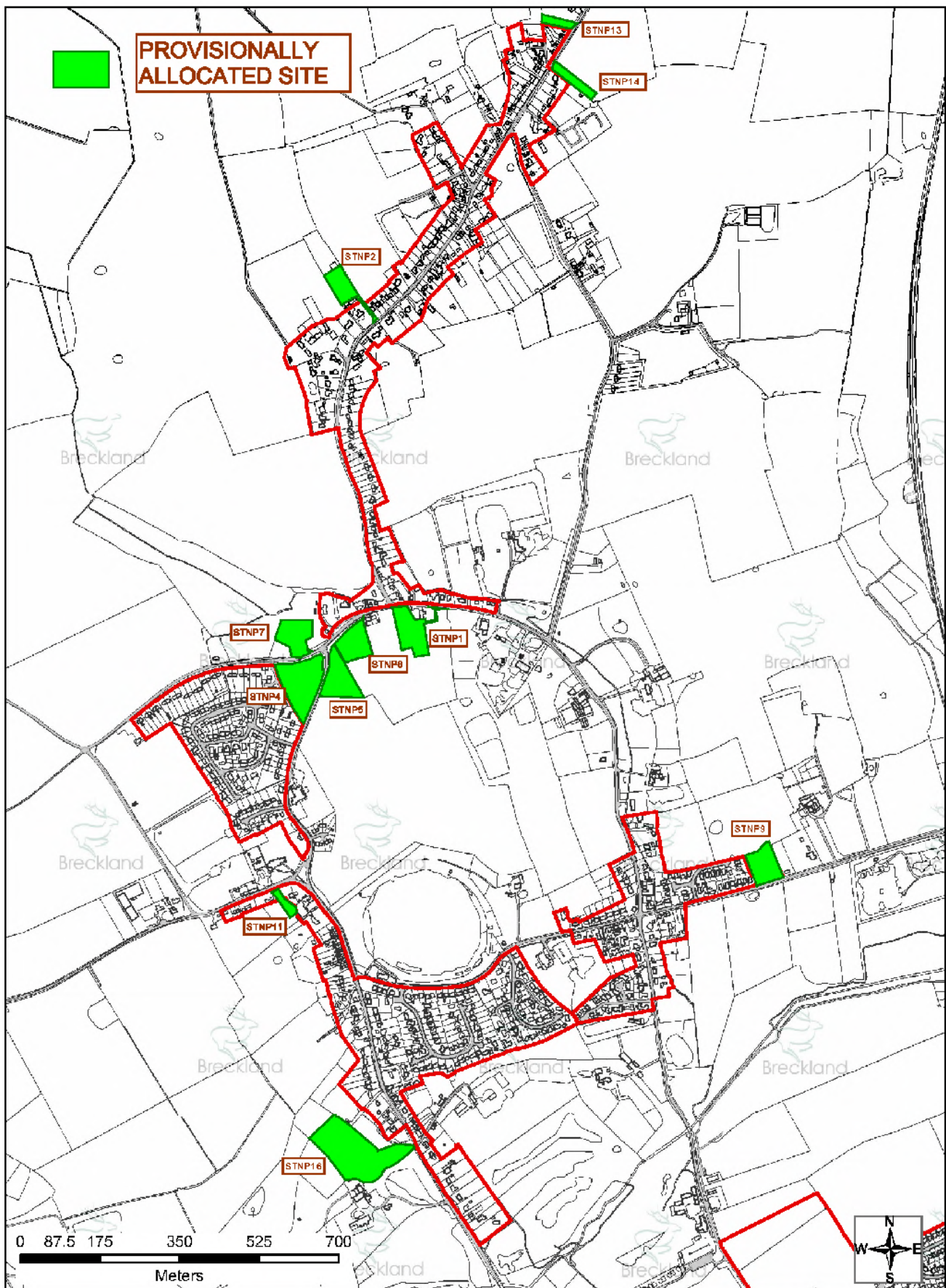


Fig. 11: Provisionally Allocated Sites at Pre-Submission Prior to Owner Discussions

13.0 REVIEW OF ANY CUMULATIVE IMPACT ON LANDSCAPE CHARACTER

13.1 A final review must be carried out before confirming the selection of the sites noted in section 12 and shown in Figure 11 for allocation in the Neighbourhood Plan, and that relates to any cumulative impact adjacent sites may have on landscape character (see 9.3.2.6)). This review applies to STNP1, STNP4, STNP5, STNP6 and STNP7, which are closely grouped as shown below:

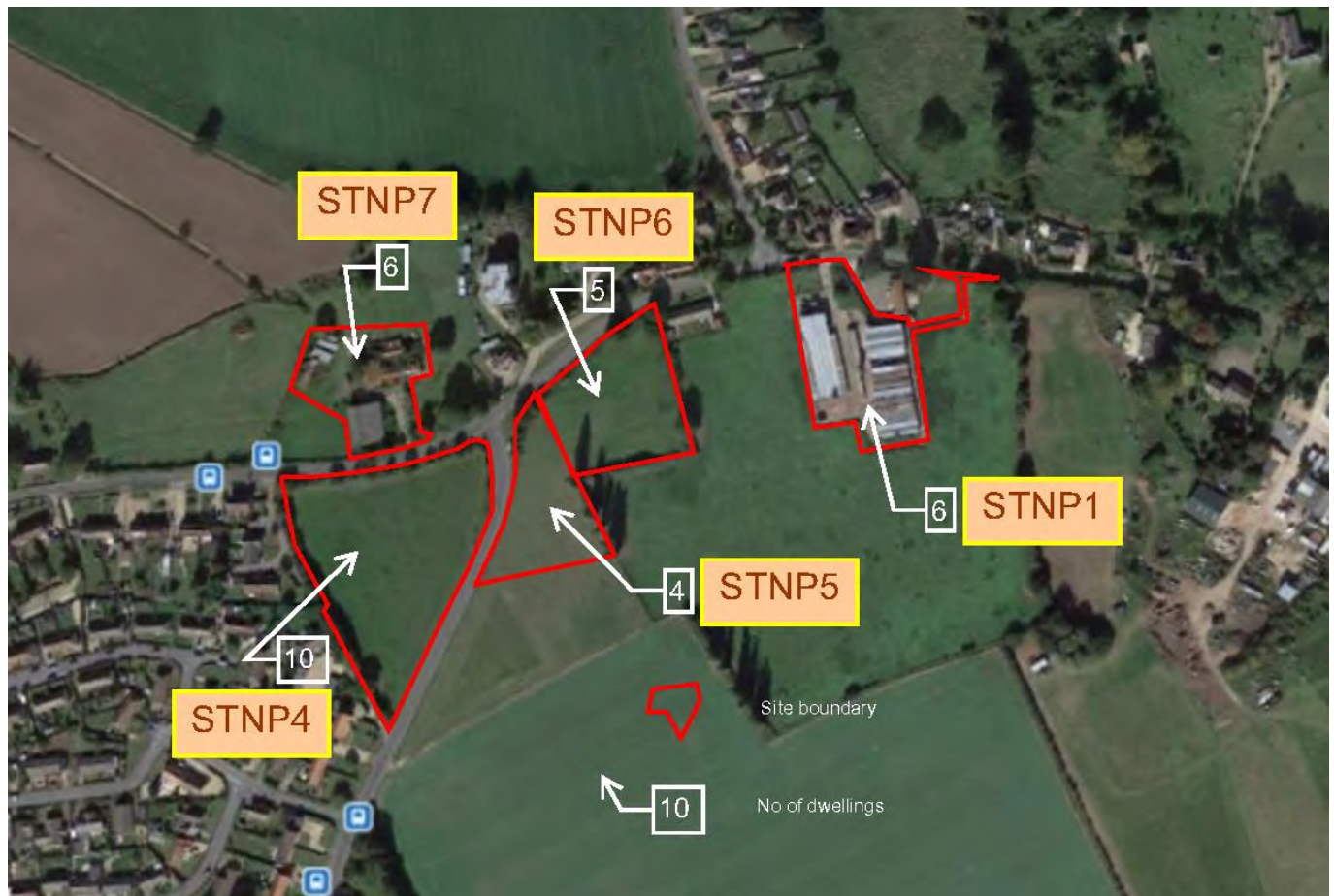


Fig. 12: Sites to Be Reviewed for Cumulative Landscape Impact

13.2 The full background to this review is given in the three volumes of the Saham Toney Parish Landscape Assessment, January 2019. Extracts from that assessment relevant to the area under consideration are given below.

13.3 From Part One, summary:

In summary, the character of the village is very much defined by its extensive distribution along the curving road network, and its multi-focal pattern. The assessment that follows demonstrates that the character of each of the clusters of settlement is different and distinctive.

Preventing coalescence and loss of the multi-focal pattern is, therefore, essential if the character of Saham Toney is to be conserved. The open spaces that separate the clusters are important for retaining the individual character and pattern seen in each area, and for orientation of the visitor within the parish. Development within the open spaces between clusters would serve to cause coalescence and linking of clusters, and loss of their individual identities.

Distinctiveness is strongest where the historic buildings and farmsteads remain dominant features in the street scenes and landscape, and where there is interaction with topography and open space.

Preservation and /or enhancement of these open spaces, and the historic buildings and their settings is of primary importance to retains the special character of Saham Toney. This means any future development should be sympathetic to these sensitivities.

13.4 From Part One, Assessment of Village Area VCA-3 Parker's

Development along Page's Lane and Pound Hill is generally on one side only, meaning long views outwards are experienced from the village edge. Views of farmland and distant tree lines is part of the visual experience. The feel on the edges is much more open than in other parts of the village.

13.5 From Part One, Description of Village Area VCA-4 Chequers

Visual experience varies. Feeling of containment when hedges and mature trees are present, Chequers Lane can feel quite intimate, but very open where boundary vegetation and rising land allows long views out to the west. The slopes here are very prominent in views from the surrounding area.

13.6 From Part Two, Assessment of Settlement Fringe Area FA-3 Oval - West

The pastures west of Page's Place have higher landscape value as they are smaller scale, retain their historic field boundary patterns, and because they provide setting to the ancient farmstead at Pages Place.

Visual sensitivity is high because of the openness of the landscape and lack of structural vegetation. The related visibility of much of this parcel means views are possible from Hills Road and more distant points to the north and west. Development here would be highly visible with few features to assimilate with.

Any proposals in this area would need to be of a scale that makes feasible substantial restoration of landscape structure to provide a new village edge. Houses could be integrated within wooded edges and result in an improvement to the sometimes stark village edges that are currently found.

13.7 From Part Two, Assessment of Settlement Fringe Area FA-4 Page's – North and South

Open space plays an important contribution to character alongside built form in the interrelationships that result. Twentieth century housing has a less positive impact, although for the most part, at The Oval, is successfully assimilated.

The tract in the centre of the circuit of lanes appears to have remained historically unsettled. The pattern of small fields has been amalgamated. Today it functions to provide separation between the different outlying parts of the village, the dispersed nature of which is key to its character.

The parcel is visually highly sensitive as it is prominent in views from Pound Hill in the foreground of long views towards the Mere and Watton to the southeast. Visual sensitivity also associated with the slopes behind Pages Place where they form the backdrop to views of this heritage asset.

Development in open areas here would change the character of this piece of land significantly and potentially cause coalescence of different settlement clusters. Where the settlement edges are well defined, new intakes of land for development would be visually prominent and difficult to assimilate.

There is more scope for sensitive redevelopment of existing farmsteads but any such proposals would need to be accompanied by substantial native planting proposals.

13.8 It is clear from the above extracts that the area in which the five sites concerned are located is one that would be sensitive to landscape change and that any impacts resulting from development must be managed. The Landscape Character Assessment, as seen in the above extracts, is particularly clear about the preservation of open space between development clusters being fundamental to village character and identity. This is not to say there should be no development, but does indicate a need to carefully plan and manage development in a way that respects, preserves and reinforces that character and identity. Looked at from an overall perspective the main gaps are as illustrated in Figure 13.



Fig. 13: Main Settlement Gaps in the Area Under Review

13.9 Clearly sites STNP4, 5, 6 and 7 are located in one of the main settlement gap spaces. At a level more local to the sites, as a starting point the Figure 14 illustrates the key open spaces in this area and two key views; one looking south from Hills Road towards Page's Place and further to St. George's Church and Watton; and other looking south from Pound Hill towards Saham Mere.



Fig. 14: Key open spaces and views in area of combined sites

13.10 Figure 14 shows that the sites most related to the key open spaces are STNP4, STNP5 and STNP6. Sites STNP1 and STNP7, as reduced in extent by constraint conditioning will not in themselves have a harmful impact on landscape and character since their development will comprise the replacement of

existing farm buildings with residential dwellings and this will not intrude on existing open space: development in these locations is already part of the landscape. However, they do form part of the established built form against which open space is experienced. STNP4, STNP5 and STNP6 may be considered to effectively be a single site, hereafter designated STNP456, with potential for 19 dwellings, as conditioned. The site falls into settlement fringe area FA-4 as defined in the Saham Toney Parish Landscape Assessment, January 2019. Overall that area has moderate landscape sensitivity and high visual sensitivity, resulting in a combined landscape sensitivity that is moderate-high. As such, under Policy 7A of the Saham Toney Neighbourhood Plan, any development proposal in the area must be justified by a professionally prepared Landscape and Visual Impact Assessment. It is not the purpose of this report to carry out such an assessment: instead it will be a condition of a site-specific policy should STNP456 be selected as an allocated or reserve site. The purpose of this review is to confirm whether the provisional selection of STNP456 for allocation is appropriate with regard to cumulative landscape impact, such that it may be allocated.

13.11 The first step in this cumulative impact review is to establish the combined landscape sensitivity of STNP456 at site level. The methodology is derived from guidance given in “Landscape Character Assessment Guidance for England and Scotland, Topic paper 6: Techniques and Criteria for Judging Capacity and Sensitivity”, and the results are set out in Tables 49 and 50.

13.12 The results indicate that site STNP456 has moderate landscape sensitivity and moderate-high visual sensitivity. Hence it has **moderate-high combined landscape sensitivity** (reference Table 48).

Landscape Sensitivity	High	MODERATE	MODERATE TO HIGH	MODERATE-HIGH	HIGH	HIGH
	Moderate to High	LOW TO MODERATE	MODERATE	MODERATE TO HIGH	MODERATE TO HIGH	HIGH
	Moderate	LOW-MODERATE	LOW TO MODERATE	MODERATE	MODERATE TO HIGH	MODERATE-HIGH
	Low to Moderate	LOW	LOW TO MODERATE	LOW TO MODERATE	MODERATE	MODERATE TO HIGH
	Low	LOW	LOW	LOW-MODERATE	LOW TO MODERATE	MODERATE
TABLE 48. COMBINED LANDSCAPE SENSITIVITIES		Low	Low to Moderate	Moderate	Moderate to High	High
		Visual Sensitivity				

TABLE 49: ASSESSMENT AGAINST INDICATORS OF VALUE / SENSITIVITY: Landscape

PHYSICAL / LANDSCAPE INDICATORS		SENSITIVITY / VALUE		
		Low	Moderate	High
Designations / Policies	To what extent are the land parcel, and its features, covered by any landscape, habitat or heritage designations?	No designations or of only minor significance	At least one designation and of increasing significance	Wider range of designations with greater significance
	To what extent are the land parcel, and its features, covered by any planning policy criteria relating to landscape or heritage?	No policy criteria, or of minor significance	Increasing amount and significance of policy criteria	Greatest amount and significance of policy criteria
	What cultural value exists?	Little or no cultural value	Some cultural value	High cultural value
	What is the significance of any historic landscape and heritage assets (both designated and non-designated) within it?	Of little or no significance	Of increasing significance	Of highest significance
	To what extent does the landscape form the setting for defined heritage assets?	Little or no contribution to setting	Makes some contribution	Makes a significant contribution
	Do local green spaces, wildlife sites or ancient woodland occur?	No local green spaces, wildlife sites or ancient woodland	One or more of moderate importance	A greater number and/or of higher importance
Landform	To what extent does topography and landform play a role in defining character and sense of place?	Topography and landform play little role in defining character and sense of place	Topography and landform play some role in defining character and sense of place	Topography and landform play a key role in defining character and sense of place
	How vulnerable is the character to the loss of visible landform?	Little or no vulnerability	Moderate vulnerability	High vulnerability
Pattern, enclosure and condition	What are the vegetative and field patterns?	Simple, large scale open	Medium scale field sizes	Small scale, fine grain
		Little evidence of historic field pattern	Evidence of partial boundary loss	Historic field patterns strongly in evidence
		Boundary straightening and field amalgamation	Condition of hedges sometimes poor	Limited amalgamation
		Hedges often absent - only remnant boundary vegetation	Some hedgerow trees endure	Intact network of hedges; Regular hedgerow trees

	How intact are habitats?	Few or no habitats intact	Some habitats intact	Many and varied habitats intact
	What is the state of repair of characteristic features?	Landscape in poor condition;	Some indication of time-depth	Strong indication of time-depth
		Little indication of time-depth	Landscape in moderate condition	Landscape in good to excellent condition
Settlement edges, and gateways	What is the nature and form of the settlement edges and gateways? <i>Long established, settlement edges where low density, historic settlement prevails, untouched by modern influences, are more valued than those where the historic settlement edge is no longer evident, owing to modern development and where 20th - 21st century development has resulted in a stark interface.</i>	Abrupt interface between settlement and countryside	Reasonable boundary vegetation;	Porous edge to settlement, softened by vegetation
		Boundary vegetation absent or sparse	Gateway(s) reasonable	Breaks allow interface between settlement and countryside
		Poorly defined gateway(s)	Some gateway definition	Well defined, distinctive gateway(s)
		Modern or high-density development dominates edges	Moderate settlement density at edges, modern development less dominant	Low settlement density at edges; less modern development
		Settlement edge poorly defined and indistinct	Some definition of settlement edge	Well defined settlement edges
Rarity and replaceability	How unique is the landscape?	Of little or no rarity	Unique in a local context	Unique in a district, county or national context
	How easily could landscape features be replaced?	With ease	With a degree of difficulty	With great difficulty

TABLE 50: ASSESSMENT AGAINST INDICATORS OF VALUE / SENSITIVITY: Visual and perceptual

VISUAL AND PERCEPTUAL INDICATORS		Low Moderate High SENSITIVITY / VALUE		
Visual prominence	How generally visible is the land from the surrounding landscape, settlement edges, highways or rights of way? <i>Land that is visually prominent, owing to the combined effects of landform, tree cover or settlement is more visually sensitive than land which is enclosed and hard to see into.</i>	Conditions combine to make views of land generally difficult to experience	Moderately visible in views from some points	Visually prominent, forming part of view from many points
	What views are there from major routes? Land in such views is deemed more sensitive than land that is only visible from the minor lanes.	Limited visibility from principle routes. Single or no views from footpaths / secondary routes.	Views from a few points on footpaths / secondary routes and/or at longer range	Integral part of view from one or more principal routes.
	Includes consideration of the extent to which pedestrians are likely to be affected by views of residential development.	Few or no views available.	Some views available where conditions allow.	Direct views from multiple footpaths / secondary routes, or at close range.
Vulnerability of views	What is the nature of the view(s) of a land parcel?	Locations where the view is incidental and its nature is of limited value or poorly composed with numerous detracting features. Land parcel not seen within a key view	Locations with valued view(s) which generally represent a pleasing composition but may include some detracting elements. Land parcel is seen in at least one key view without being prominent	Locations with highly valued, impressive or well composed view(s), with no detracting features. Land parcel is prominent in one or more key views
Types of people experiencing visual change	Who would experience any visual change? <i>Residents and visitors are more sensitive viewers. Those engaged in travel to / from / on work, or at work, are less sensitive viewers.</i>	Those of low sensitivity including: - Those at work; - Vehicle users on main routes; - Those on public transport; - Those moving to or from work or school etc.	Those of moderate sensitivity including: - Those with partially obscured views from their homes and gardens; - Pedestrians on main routes; - Vehicle users on minor routes	Seen by those of high sensitivity including: - Those with predominantly open views from their homes and gardens; - Pedestrians using minor routes

	What is the viewers' tolerance to change?	Consider the view is incidental or unimportant. Tolerant of a high degree of change.	Consider the view is important but not the primary focus. Tolerant of some change.	Consider the view is of primary importance. Likely to notice even minor change
	How many people would see a change?	A small number	A moderate number	A high number
Tranquility / activity	How tranquil is the land parcel, considering aspects such as: - Traffic noise from highways; - Movement from people or vehicles; - Sense of remoteness and tranquility. <i>Landscapes with a higher degree of remoteness and tranquility will have a higher sensitivity to residential development.</i>	Rarely tranquil, regular human activity seen and/ or heard Regularly disturbed or impinged upon by traffic, development or infrastructure.	Sometimes tranquil, but some human activity seen and/or heard Some interruption by noise and visual intrusion associated with traffic, development or infrastructure	Relatively remote and tranquil, little human activity seen or heard Strong perceptions of peacefulness or wildness and naturalness.
Aesthetic perception	How are aesthetic attributes judged, including: - Interplay of landform and landscape structure; - Texture, pattern and colour; - Naturalness; - The presence or absence of detracting features or human activity. <i>Landscapes of higher sensitivity have a more aesthetically pleasing combination of features, likely indicated by complexity, variety, and naturalness, and absence of human scale features.</i>	Simple and uniform in texture; Sense of naturalness eroded; Features of human activity very apparent; Not considered scenic.	Moderately varied texture, Reasonably good degree of naturalness; Some features of human activity apparent but not overbearing; Moderately scenic.	Complex and varied texture; High degree of naturalness; Few or no features of human activity; Considered scenic.

13.13 In order to form an overall sensitivity judgement account must be taken of scope for mitigation of landscape impact. Scope for mitigation is considered to fall into one of the following three categories:

- a) Good: Mitigation of adverse effects is feasible and is likely to be sympathetic in character;
- b) Moderate: There is some scope for effective mitigation measures that would not be wholly discordant with landscape character; or
- c) Limited: Prevailing conditions mean mitigation would be difficult and/or likely to be discordant with landscape character.

13.14 Given its relatively small scale and low density, site STNP456 is judged to have good scope for mitigation.

13.15 Overall landscape sensitivity is derived from the relationship between combined sensitivity and scope for mitigation, as set out in Table 51. On this basis it is concluded **that site STNP456 has moderate overall landscape sensitivity.**

Scope for mitigation	Limited	LOW-MODERATE	MODERATE	MODERATE-HIGH	HIGH	HIGH
	Moderate	LOW	LOW TO MODERATE	MODERATE	MODERATE TO HIGH	HIGH
	Good	LOW	LOW	LOW-MODERATE	MODERATE	MODERATE TO HIGH
TABLE 51: OVERALL LANDSCAPE SENSITIVITIES		Low	Low to Moderate	Moderate	Moderate to High	High
		Combined Landscape Sensitivity				

13.16 The landscape capacity of the site to accept development is established by considering its overall sensitivity in combination with its landscape value. Capacity is then established as set out in Table 52.

Overall Landscape Sensitivity	High	MODERATE	LOW-MODERATE	LOW-MODERATE	LOW	LOW
	Moderate to High	MODERATE TO HIGH	MODERATE	LOW-MODERATE	LOW-MODERATE	LOW
	Moderate	MODERATE TO HIGH	MODERATE TO HIGH	MODERATE	LOW-MODERATE	LOW-MODERATE
	Low to Moderate	HIGH	MODERATE TO HIGH	MODERATE TO HIGH	MODERATE	LOW-MODERATE
	Low	HIGH	HIGH	MODERATE TO HIGH	MODERATE TO HIGH	MODERATE
TABLE 52: LANDSCAPE CAPACITY		Low	Low to Moderate	Moderate	Moderate to High	High
		Landscape Value				

13.17 Landscape value

Landscape value may be defined as “the relative value that is attached to different landscapes by society”. Individual elements of a landscape, such as trees, buildings, hedgerows or historic features, may also have value, particularly when assessed at site level. Landscape value is judged against the criteria given in Table 53.

Criterion	STNP456 Landscape value
Landscape quality, condition and distinctiveness: the extent to which typical character is represented in individual areas, the intactness of the landscape from visual, functional and ecological perspectives and the condition of individual elements of the landscape.	MODERATE: Largely intact landscape in moderate condition
Scenic quality: depends upon perception and reflects the particular combination and pattern of elements in the landscape, its aesthetic qualities, its more intangible sense of place or ‘genius loci’ and other more intangible qualities.	MODERATE: The site is part of a wider area that evokes a strong sense of place, but in itself is not as scenic as the whole
Rarity: A landscape may be valued because it is a rare type, or because it contains rare elements, features or attributes.	LOW: A common landscape in the Neighbourhood Area
Representativeness: A landscape may be valued because it is considered to be a particularly good example of its type either in terms of its overall character or because of the elements or features it contains.	MODERATE: A fairly typical landscape elevated in value by its setting and context
Conservation interests: The presence of features of wildlife, earth science or archaeological or historical and cultural interest can add to the value of the landscape as well as having value in their own right.	MODERATE: Historical interest as part of the area first developed in the village
Perceptual aspects: A landscape may be valued for its perceptual qualities, notably wildness and/or tranquillity	HIGH: Forms part of the important gap between settlement clusters and part of the setting for key and valued views
Consensus: There may be a consensus of opinion, expressed by the public, informed professionals, interest groups, and artists, writers and other media, on the importance of the landscape.	MODERATE: Valued by villagers as an evocative gateway to the historic core of the village

Table 53: STNP456 Landscape Value Assessment

From the above assessment it is concluded that STNP456 has moderate landscape value.

13.18 STNP456 has been shown to have moderate overall landscape sensitivity and moderate landscape value. By reference to Table 52 it therefore has **moderate capacity**.

13.19 Magnitude of change is judged against the criteria listed in Table 54.

Magnitude of change	Criteria
High	Where the development would appear as a significant new component in the landscape and result in a significant change in the existing balance of components, or cause a total loss or major alteration to the elements comprising the baseline conditions
Medium	Where the development would appear as a distinctly noticeable new component in the landscape and result in a readily perceived change in the existing balance of components, or cause a partial loss or alteration to the elements comprising the baseline conditions
Low	Where the development would appear as a noticeable new component in the landscape and result in a discernible change in the existing balance of components, or cause a minor loss or alteration to the elements comprising the baseline conditions
Negligible / no change	Where the development would appear as a new component in the landscape, resulting in a barely perceptible change in the existing balance of components, or where the development would not appear uncharacteristic to the existing baseline conditions

Table 54: Criteria to Establish Magnitude of Change

Site STNP456 forms part of a tract of land along Page's Lane and Pound Hill that may effectively be considered a gateway between Saham Toney and Saham Hills. However, it is on the periphery of a larger tract of land between Pound Hill and Saham Mere that gives the area its character and sense of place (see Fig. 10). The proposed development is for 19 dwellings with a low density, giving adequate opportunity for landscaping designed to maintain an open feel. On this basis it is concluded that the magnitude of change resulting from development of the site would be "low", as described above.

13.20 Taking account of the overall landscape sensitivity of site STNP456 in combination with the likely magnitude of change, as set out in table 54, the impact significance of developing the site would be low-moderate, as shown in Table 55.

Magnitude of Change	High	LOW-MODERATE	MODERATE	MODERATE-HIGH	HIGH	HIGH
	Moderate	LOW	LOW TO MODERATE	MODERATE	MODERATE TO HIGH	HIGH
	Low	NEUTRAL	LOW	LOW-MODERATE	MODERATE	MODERATE TO HIGH
	Negligible	NEUTRAL	NEUTRAL	LOW	LOW-MODERATE	MODERATE
TABLE 55: IMPACT SIGNIFICANCE		Low	Low to Moderate	Moderate	Moderate to High	High
		Overall Landscape Sensitivity				

13.21 The various categories of impact significance ratings are as given in Table 56.

Rating	Effects
High	The proposals are at complete variance with the landform, scale and pattern of the landscape. ❖ They are highly visual and extremely intrusive, destroying fine and valued views both into and across the area; ❖ They would irrevocably damage or degrade, badly diminish or even destroy the integrity of characteristic features and elements and their setting; ❖ They would cause a very high quality or highly vulnerable landscape to be irrevocably changed and its quality very considerably diminished; ❖ They could not be mitigated for, i.e. there are no measures that would protect or replace the loss of the landscape.
Moderate-high	The proposals are at considerable variance with the landform, scale and pattern of the landscape. ❖ They are visually intrusive and would disrupt fine and valued views of the area; ❖ They are likely to degrade, diminish or even destroy the integrity of a range of characteristic features and elements of their setting; ❖ They would be substantially damaging to a high quality or highly vulnerable landscape, resulting in fundamental change and be considerably diminished in quality; ❖ They cannot be adequately mitigated for.
Moderate	The proposals are out of scale with the landscape, or at odds with the local pattern and landform. ❖ They are not possible to fully mitigate for, that is, mitigation will not prevent the scheme from scarring the landscape in the longer term as some features of interest will be partly destroyed or their setting reduced or removed; ❖ They will have an adverse impact on a landscape of recognised quality or on vulnerable and important characteristic features or elements; ❖ They are in conflict with local and national policies to protect open land and nationally recognised countryside and historic environment.
Low-moderate	The proposals do not quite fit the landform and scale of the landscape. ❖ Although not very visually intrusive, they will impact on certain views into and across the area; ❖ They cannot be completely mitigated for because of the nature of the proposal itself or the character of the landscape through which it passes; ❖ They may affect an area of recognised landscape quality; ❖ They do not conflict with policies for protecting the local character of the countryside.
Low	The proposals are well designed to complement the scale, landform and pattern of the landscape. ❖ They incorporate measures for mitigation to ensure that the scheme will blend in well with surrounding landscape features and landscape elements; ❖ They avoid neither being visually intrusive nor have an adverse effect on the current level of tranquillity of the landscape through which the route passes;

	❖ They maintain existing landscape character in an area which is not a designated landscape, that is, neither national nor local high quality, nor is it vulnerable to change; ❖ They avoid conflict with government policy towards protection of the countryside.
Neutral	No impact

Table 56: Impact Significance Descriptions

13.22 At pre-submission stage, subject to consultation on the Neighbourhood Plan, it can be concluded from the description in Table 56 that site STNP456'S low-moderate impact significance would be acceptable, but that carefully designed, and sympathetic landscape impact mitigation measures will be required. A full professional Landscape and Visual Impact Assessment will be a policy requirement for this site to confirm the findings of this review and to provide comprehensive recommendations for mitigation measures.

14.0 SITE STNP16 LANDSCAPE IMPACT REVIEW

14.1 Although site STNP16 is a single site and does not contribute to any cumulative landscape impact, other than STNP456, it is the next largest site proposed for allocation, and the Saham Toney Parish Landscape Assessment Part Two, January 2019, does highlight potential concern that larger scale development in the site's area may have a harmful impact. Hence a review is made of the site, using the same methodology as set out in section 13.

14.2 The first step in this cumulative impact review is to establish the combined landscape sensitivity of STNP16 at site level. The methodology is the same as that used in the Parish Landscape Assessment, and the results are set out in Tables 58 and 59.

14.3 The results indicate that site STNP16 has low-moderate landscape sensitivity and moderate visual sensitivity. Hence it has **low-moderate combined landscape sensitivity** (reference Table 57).

Landscape Sensitivity	High	MODERATE	MODERATE TO HIGH	MODERATE-HIGH	HIGH	HIGH
	Moderate to High	LOW TO MODERATE	MODERATE	MODERATE TO HIGH	MODERATE TO HIGH	HIGH
	Moderate	LOW-MODERATE	LOW TO MODERATE	MODERATE	MODERATE TO HIGH	MODERATE-HIGH
	Low to Moderate	LOW	LOW TO MODERATE	LOW TO MODERATE	MODERATE	MODERATE TO HIGH
	Low	LOW	LOW	LOW-MODERATE	LOW TO MODERATE	MODERATE
TABLE 57: STNP16 COMBINED LANDSCAPE SENSITIVITIES		Low	Low to Moderate	Moderate	Moderate to High	High
		Visual Sensitivity				

TABLE 58: STNP16 ASSESSMENT AGAINST INDICATORS OF VALUE / SENSITIVITY: Landscape

PHYSICAL / LANDSCAPE INDICATORS		SENSITIVITY / VALUE		
		Low	Moderate	High
Designations / Policies	To what extent are the land parcel, and its features, covered by any landscape, habitat or heritage designations?	No designations or of only minor significance	At least one designation and of increasing significance	Wider range of designations with greater significance
	To what extent are the land parcel, and its features, covered by any planning policy criteria relating to landscape or heritage?	No policy criteria, or of minor significance	Increasing amount and significance of policy criteria	Greatest amount and significance of policy criteria
	What cultural value exists?	Little or no cultural value	Some cultural value	High cultural value
	What is the significance of any historic landscape and heritage assets (both designated and non-designated) within it?	Of little or no significance	Of increasing significance	Of highest significance
	To what extent does the landscape form the setting for defined heritage assets?	Little or no contribution to setting	Makes some contribution	Makes a significant contribution
	Do local green spaces, wildlife sites or ancient woodland occur?	No local green spaces, wildlife sites or ancient woodland	One or more of moderate importance	A greater number and/or of higher importance
Landform	To what extent does topography and landform play a role in defining character and sense of place?	Topography and landform play little role in defining character and sense of place	Topography and landform play some role in defining character and sense of place	Topography and landform play a key role in defining character and sense of place
	How vulnerable is the character to the loss of visible landform?	Little or no vulnerability	Moderate vulnerability	High vulnerability
Pattern, enclosure and condition	What are the vegetative and field patterns?	Simple, large scale open	Medium scale field sizes	Small scale, fine grain
		Little evidence of historic field pattern	Evidence of partial boundary loss	Historic field patterns strongly in evidence
		Boundary straightening and field amalgamation	Condition of hedges sometimes poor	Limited amalgamation
		Hedges often absent - only remnant boundary vegetation	Some hedgerow trees endure	Intact network of hedges; Regular hedgerow trees

	How intact are habitats?	Few or no habitats intact	Some habitats intact	Many and varied habitats intact
	What is the state of repair of characteristic features?	Landscape in poor condition;	Some indication of time-depth	Strong indication of time-depth
		Little indication of time-depth	Landscape in moderate condition	Landscape in good to excellent condition
Settlement edges, and gateways	What is the nature and form of the settlement edges and gateways? <i>Long established, settlement edges where low density, historic settlement prevails, untouched by modern influences, are more valued than those where the historic settlement edge is no longer evident, owing to modern development and where 20th - 21st century development has resulted in a stark interface.</i>	Abrupt interface between settlement and countryside	Reasonable boundary vegetation;	Porous edge to settlement, softened by vegetation
		Boundary vegetation absent or sparse	Gateway(s) reasonable	Breaks allow interface between settlement and countryside
		Poorly defined gateway(s)	Some gateway definition	Well defined, distinctive gateway(s)
		Modern or high-density development dominates edges	Moderate settlement density at edges, modern development less dominant	Low settlement density at edges; less modern development
		Settlement edge poorly defined and indistinct	Some definition of settlement edge	Well defined settlement edges
Rarity and replaceability	How unique is the landscape?	Of little or no rarity	Unique in a local context	Unique in a district, county or national context
	How easily could landscape features be replaced?	With ease	With a degree of difficulty	With great difficulty

TABLE 59: STNP16 ASSESSMENT AGAINST INDICATORS OF VALUE / SENSITIVITY: Visual and perceptual

VISUAL AND PERCEPTUAL INDICATORS		SENSITIVITY / VALUE		
		Low	Moderate	High
Visual prominence	How generally visible is the land from the surrounding landscape, settlement edges, highways or rights of way? <i>Land that is visually prominent, owing to the combined effects of landform, tree cover or settlement is more visually sensitive than land which is enclosed and hard to see into.</i>	Conditions combine to make views of land generally difficult to experience	Moderately visible in views from some points	Visually prominent, forming part of view from many points
	What views are there from major routes? Land in such views is deemed more sensitive than land that is only visible from the minor lanes.	Limited visibility from principle routes. Single or no views from footpaths / secondary routes	Views from a few points on footpaths / secondary routes and/or at longer range	Integral part of view from one or more principal routes.
	Includes consideration of the extent to which pedestrians are likely to be affected by views of residential development.	Few or no views available.	Some views available where conditions allow.	Direct views from multiple footpaths / secondary routes, or at close range.
Vulnerability of views	What is the nature of the view(s) of a land parcel?	Locations where the view is incidental and its nature is of limited value or poorly composed with numerous detracting features. Land parcel not seen within a key view	Locations with valued view(s) which generally represent a pleasing composition but may include some detracting elements. Land parcel is seen in at least one key view without being prominent	Locations with highly valued, impressive or well composed view(s), with no detracting features. Land parcel is prominent in one or more key views
Types of people experiencing visual change	Who would experience any visual change? <i>Residents and visitors are more sensitive viewers. Those engaged in travel to / from / on work, or at work, are less sensitive viewers.</i>	Those of low sensitivity including: - Those at work; - Vehicle users on main routes; - Those on public transport; - Those moving to or from work or school etc.	Those of moderate sensitivity including: - Those with partially obscured views from their homes and gardens; - Pedestrians on main routes; - Vehicle users on minor routes	Seen by those of high sensitivity including: - Those with predominantly open views from their homes and gardens; - Pedestrians using minor routes

	What is the viewers' tolerance to change?	Consider the view is incidental or unimportant. Tolerant of a high degree of change.	Consider the view is important but not the primary focus. Tolerant of some change.	Consider the view is of primary importance. Likely to notice even minor change
	How many people would see a change?	A small number	A moderate number	A high number
Tranquility / activity	How tranquil is the land parcel, considering aspects such as: - Traffic noise from highways; - Movement from people or vehicles; - Sense of remoteness and tranquility. <i>Landscapes with a higher degree of remoteness and tranquility will have a higher sensitivity to residential development.</i>	Rarely tranquil, regular human activity seen and/ or heard Regularly disturbed or impinged upon by traffic, development or infrastructure.	Sometimes tranquil, but some human activity seen and/or heard Some interruption by noise and visual intrusion associated with traffic, development or infrastructure	Relatively remote and tranquil, little human activity seen or heard Strong perceptions of peacefulness or wildness and naturalness.
Aesthetic perception	How are aesthetic attributes judged, including: - Interplay of landform and landscape structure; - Texture, pattern and colour; - Naturalness; - The presence or absence of detracting features or human activity. <i>Landscapes of higher sensitivity have a more aesthetically pleasing combination of features, likely indicated by complexity, variety, and naturalness, and absence of human scale features.</i>	Simple and uniform in texture; Sense of naturalness eroded; Features of human activity very apparent; Not considered scenic.	Moderately varied texture, Reasonably good degree of naturalness; Some features of human activity apparent but not overbearing; Moderately scenic.	Complex and varied texture; High degree of naturalness; Few or no features of human activity; Considered scenic.

14.4 In order to form an overall sensitivity judgement account must be taken of scope for mitigation of landscape impact. Scope for mitigation is considered to fall into one of the following three categories:

- d) Good: Mitigation of adverse effects is feasible and is likely to be sympathetic in character;
- e) Moderate: There is some scope for effective mitigation measures that would not be wholly discordant with landscape character; or
- f) Limited: Prevailing conditions mean mitigation would be difficult and/or likely to be discordant with landscape character.

14.5 Given its relatively small scale and low density, site STNP16 is judged to have good scope for mitigation.

14.6 Overall landscape sensitivity is derived from the relationship between combined sensitivity and scope for mitigation, as set out in Table 60. On this basis it is concluded **that site STNP16 has low overall landscape sensitivity.**

Scope for mitigation	Limited	LOW-MODERATE	MODERATE	MODERATE-HIGH	HIGH	HIGH
	Moderate	LOW	LOW TO MODERATE	MODERATE	MODERATE TO HIGH	HIGH
	Good	LOW	LOW	LOW-MODERATE	MODERATE	MODERATE TO HIGH
TABLE 60: STNP16 OVERALL LANDSCAPE SENSITIVITIES		Low	Low to Moderate	Moderate	Moderate to High	High
		Combined Landscape Sensitivity				

14.7 The landscape capacity of the site to accept development is established by considering its overall sensitivity in combination with its landscape value. Capacity is then established as set out in Table 61.

Overall Landscape Sensitivity	High	MODERATE	LOW-MODERATE	LOW-MODERATE	LOW	LOW
	Moderate to High	MODERATE TO HIGH	MODERATE	LOW-MODERATE	LOW-MODERATE	LOW
	Moderate	MODERATE TO HIGH	MODERATE TO HIGH	MODERATE	LOW-MODERATE	LOW-MODERATE
	Low to Moderate	HIGH	MODERATE TO HIGH	MODERATE TO HIGH	MODERATE	LOW-MODERATE
	Low	HIGH	HIGH	MODERATE TO HIGH	MODERATE TO HIGH	MODERATE
TABLE 61: STNP16 LANDSCAPE CAPACITY		Low	Low to Moderate	Moderate	Moderate to High	High
		Landscape Value				

14.8 Landscape value

Landscape value may be defined as “the relative value that is attached to different landscapes by society”. Individual elements of a landscape, such as trees, buildings, hedgerows or historic features, may also have value, particularly when assessed at site level. Landscape value is judged against the criteria given in Table 62.

Criterion	STNP16 Landscape value
Landscape quality, condition and distinctiveness: the extent to which typical character is represented in individual areas, the intactness of the landscape from visual, functional and ecological perspectives and the condition of individual elements of the landscape.	MODERATE: Largely intact landscape in moderate condition
Scenic quality: depends upon perception and reflects the particular combination and pattern of elements in the landscape, its aesthetic qualities, its more intangible sense of place or ‘genius loci’ and other more intangible qualities.	LOW: The site is part of a long view south across fields from Richmond Road, but is a very distant view
Rarity: A landscape may be valued because it is a rare type, or because it contains rare elements, features or attributes.	LOW: A common landscape in the Neighbourhood Area
Representativeness: A landscape may be valued because it is considered to be a particularly good example of its type either in terms of its overall character or because of the elements or features it contains.	MODERATE: A fairly typical landscape
Conservation interests: The presence of features of wildlife, earth science or archaeological or historical and cultural interest can add to the value of the landscape as well as having value in their own right.	LOW: Being a residential garden, the site has no special interest in this respect
Perceptual aspects: A landscape may be valued for its perceptual qualities, notably wildness and/or tranquillity	MODERATE: A tranquil area
Consensus: There may be a consensus of opinion, expressed by the public, informed professionals, interest groups, and artists, writers and other media, on the importance of the landscape.	LOW: No especial value

Table 62: STNP16 Landscape Value Assessment

From the above assessment it is concluded that STNP16 has low-moderate landscape value.

14.9 STNP16 has been shown to have moderate overall landscape sensitivity and moderate landscape value. By reference to Table 61 it therefore has **high capacity**.

14.10 Magnitude of change is judged against the criteria listed in Table 63.

Magnitude of change	Criteria
High	Where the development would appear as a significant new component in the landscape and result in a significant change in the existing balance of components, or cause a total loss or major alteration to the elements comprising the baseline conditions

Medium	Where the development would appear as a distinctly noticeable new component in the landscape and result in a readily perceived change in the existing balance of components, or cause a partial loss or alteration to the elements comprising the baseline conditions
Low	Where the development would appear as a noticeable new component in the landscape and result in a discernible change in the existing balance of components, or cause a minor loss or alteration to the elements comprising the baseline conditions
Negligible / no change	Where the development would appear as a new component in the landscape, resulting in a barely perceptible change in the existing balance of components, or where the development would not appear uncharacteristic to the existing baseline conditions

Table 63: Criteria to Establish Magnitude of Change

14.11 Development of site STNP16 would be in contrast to the existing ribbon development along most of the west side of Richmond Road, although a recent development immediately to the north of the site already adds to settlement depth. However, other than from neighbouring properties and in a long-distance view from Richmond Road to the north, development would not be publicly visible. The proposed development is for 17 dwellings with a low density, giving adequate opportunity for landscaping designed to maintain an open feel. Weighing these factors, it is concluded that the magnitude of change resulting from development of the site would be “medium”, as described above.

14.12 Taking account of the overall landscape sensitivity of site STNP16 in combination with the likely magnitude of change, as set out in Table 63, the impact significance of developing the site would be low, as shown in Table 64.

Magnitude of Change	High	LOW-MODERATE	MODERATE	MODERATE-HIGH	HIGH	HIGH
	Moderate	LOW	LOW TO MODERATE	MODERATE	MODERATE TO HIGH	HIGH
	Low	NEUTRAL	LOW	LOW-MODERATE	MODERATE	MODERATE TO HIGH
	Negligible	NEUTRAL	NEUTRAL	LOW	LOW-MODERATE	MODERATE
TABLE 64: STNP16 IMPACT SIGNIFICANCE		Low	Low to Moderate	Moderate	Moderate to High	High
		Overall Landscape Sensitivity				

14.13 The various categories of impact significance ratings are as given in Table 65.

Rating	Effects
High	The proposals are at complete variance with the landform, scale and pattern of the landscape. ❖ They are highly visual and extremely intrusive, destroying fine and valued views both into and across the area; ❖ They would irrevocably damage or degrade, badly diminish or even destroy the integrity of characteristic features and elements and their setting;

	❖ They would cause a very high quality or highly vulnerable landscape to be irrevocably changed and its quality very considerably diminished; ❖ They could not be mitigated for, i.e. there are no measures that would protect or replace the loss of the landscape.
Moderate-high	The proposals are at considerable variance with the landform, scale and pattern of the landscape. ❖ They are visually intrusive and would disrupt fine and valued views of the area; ❖ They are likely to degrade, diminish or even destroy the integrity of a range of characteristic features and elements of their setting; ❖ They would be substantially damaging to a high quality or highly vulnerable landscape, resulting in fundamental change and be considerably diminished in quality; ❖ They cannot be adequately mitigated for.
Moderate	The proposals are out of scale with the landscape, or at odds with the local pattern and landform. ❖ They are not possible to fully mitigate for, that is, mitigation will not prevent the scheme from scarring the landscape in the longer term as some features of interest will be partly destroyed or their setting reduced or removed; ❖ They will have an adverse impact on a landscape of recognised quality or on vulnerable and important characteristic features or elements; ❖ They are in conflict with local and national policies to protect open land and nationally recognised countryside and historic environment.
Low-moderate	The proposals do not quite fit the landform and scale of the landscape. ❖ Although not very visually intrusive, they will impact on certain views into and across the area; ❖ They cannot be completely mitigated for because of the nature of the proposal itself or the character of the landscape through which it passes; ❖ They may affect an area of recognised landscape quality; ❖ They do not conflict with policies for protecting the local character of the countryside.
Low	The proposals are well designed to complement the scale, landform and pattern of the landscape. ❖ They incorporate measures for mitigation to ensure that the scheme will blend in well with surrounding landscape features and landscape elements; ❖ They avoid neither being visually intrusive nor have an adverse effect on the current level of tranquillity of the landscape through which the route passes; ❖ They maintain existing landscape character in an area which is not a designated landscape, that is, neither national nor local high quality, nor is it vulnerable to change; ❖ They avoid conflict with government policy towards protection of the countryside.
Neutral	No impact

Table 65: Impact Significance Descriptions

14.14 It can be concluded from the description in Table 65 that site STNP16's low impact significance would be acceptable, but that carefully designed, and sympathetic landscape impact mitigation measures will be required. A full professional Landscape and Visual Impact Assessment will be a policy

requirement for this site to confirm the findings of this review and to provide comprehensive recommendations for mitigation measures.

15.0 INTERFACE WITH SITE PROPOSERS: SUGGESTED CONSTRAINT MITIGATIONS & DRAFT SITE POLICIES

15.1 The site conditioning described in section 7 and summarised in Tables 19 and 20, showed that in order to be considered for selection as an allocated site in the Neighbourhood Plan, the proposers of sites STNP3, STNP8, STNP10, STNP11 and STNP15 would have to demonstrate satisfactory mitigation of the constraints conditioned as “red” (site unsuitable for development). The applicable constraints were explained to the respective site proposers and each was given the opportunity to establish such mitigation. Responses were as follows:

15.1.1 Site STNP3: Mitigation was required for surface water flood risk. In the light of the constraint, the owners decided to withdraw this site from the selection process.

15.1.2 Site STNP8: Mitigation was required for highway access and highway network issues. In the light of the constraint, the owners decided to withdraw this site from the selection process.

15.1.3 Site STNP10: Mitigation was required for highway access issues and surface water flood risk. Over a six-week period, the owners declined to offer any mitigations. In the interests of fairness and the possibility that they might later propose solutions, the ratings for this site were re-examined to decide how they might change were the two constraints to be successfully mitigated in future. If that were the case, by reference to Tables 32 and 39, the ratings for the site would change as follows:

- a) Criterion: highway access – visibility. Rating would become 2 (Partial visibility exists at the site entrance and could be satisfactorily improved); and
- b) Criterion: appropriate surface water drainage mitigation measures. Rating would become 1 (Mitigation measures possible but unlikely to be straightforward).

If those revised ratings were applied in Table 43, the overall rating for the site would become zero. On the basis that a site with an overall rating of zero or less cannot reasonably be considered as suitable for development, STNP10 was eliminated from the selection process.

15.1.4 Site options STNP11 and STNP15: the owner of these sites put forward a solution to the access and visibility constraint identified by the Local Highways Authority. As originally proposed both options were to make use of the driveway to the existing dwelling, but that did not allow for a suitable visibility splay to the east from that site access point, since a bend in Richmond Road starts approximately 30m from that point. The solution was to amend site access to a point close to the western boundary of the existing property, and that was validated as providing a visibility splay in each direction exceeding the 59m required by the Local Highways Authority. In the case of option STNP11, this involved extending the site to the front of the existing dwelling to the western boundary of the plot. By reference to Tables 32 and 43, the solution improved the rating of both sites against the criterion for highway access – visibility. In both case the revised rating was 1 (An access point to the site is yet to be confirmed, but subject to the application of appropriate conditions, satisfactory visibility could readily be ensured), amending the overall ratings to 61 (STNP11) and 46 (STNP15). Subsequently, based on the owner’s initial review of the viability of the two options, he advised that he wished to include STNP15 rather than STNP11 in the

Neighbourhood Plan. Following informal discussions with the Local Planning Authority and subsequent agreement with the owner, site capacity for STNP15 was increased to 6 dwellings to address concerns about low density. That did not result in a change to the site’s rating.

15.2 For all sites without unresolved constraints, draft site policies were prepared. In order to verify the deliverability of those sites, it was necessary to confirm with the site owners their acceptance of the policy criteria. The discussions that ensued resulted in modifications to some of the sites, as described below.

15.2.1 Site STNP1: The original proposal for 10 dwellings had been reduced to 6 by the constraint conditioning process to take account of landscape impact. The owners pointed out that such a reduction would make the site not viable to develop, due to the high costs that will arise from the necessity to remove asbestos, and chemicals and other contaminants in the ground prior to development (due the site’s use as a pig farm. By somewhat amending the location of part of the site from the original proposal, a solution was agreed with the owners that would deliver 10 dwellings and thus be viable, but would avoid the previous landscape impact. This involved using greenfield land to the east of the brownfield area of the site, as opposed to the west, as originally proposed, which meant the existing gap between settlement clusters (the coalescence of which had been the landscape concern) would be maintained. See Figure 15 for details.

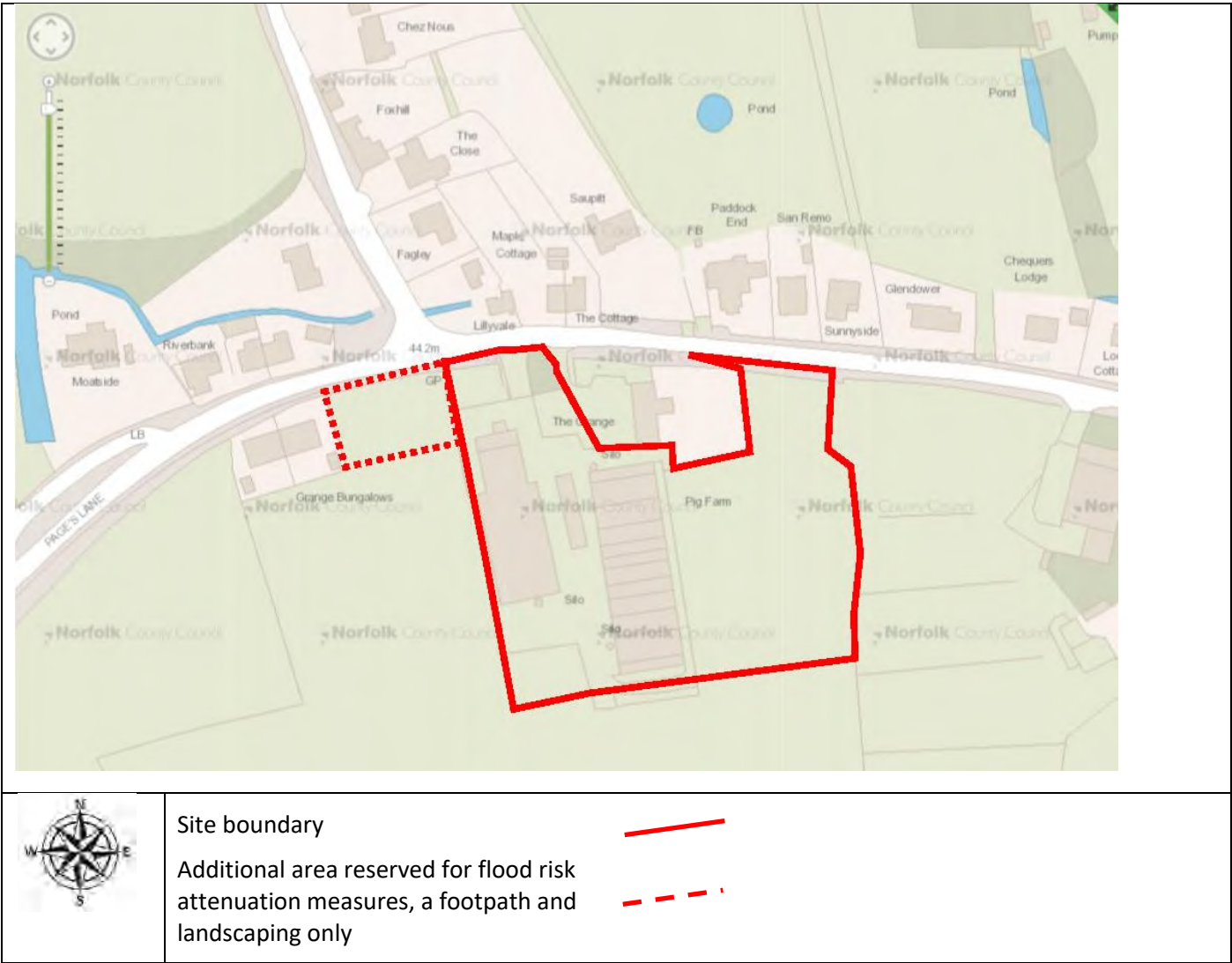


Fig. 15: Site STNP1 revised boundary

The site owners did not make comments on the revised proposal but independently of them, their land agent did, as follows:

"I note the site boundary has changed from what was previously proposed. It is not (sic) illogical to truncate the site on its western boundary as now there is no connection to site STNP6. As stated in my previous email these sites work well together and would deliver a more cohesive form of development if planned in this way. By leaving a gap as shown on the attached plan and suggesting a different timeframe for the two sites development is more likely to take a piecemeal form that would be less likely to have a positive impact on the local character. The site boundary should be reinstated to that which was proposed in my previous submissions.

I note that you have identified an area specifically for flood attenuation. This should be included within the site boundary and incorporated within the overall design of the scheme.

With regard to access it is necessary to retain an access to the east of the site to enable access for agricultural purposes.

As previously discussed, whilst I acknowledge that it is important that any new development makes a positive contribution to the local character and distinctiveness of Saham Toney, it is not necessary for a Landscape and Visual Impact Assessment to be prepared in respect of the individual sites. The level of supporting documentation should be proportionate to the scale of development proposed and no more than is sufficient to understand the potential impact of the proposal on the site and its surroundings."

These points are addressed below:

15.2.1.1 With regard to connectivity to another site, that is neither necessary nor justified because;

- a) It was not part of the original site proposals;
- b) A cohesive form and style of development could readily be achieved regardless of any connectivity to a nearby site;
- c) Contrary to the suggestion that a gap between sites would result in development being less likely to have a positive impact on landscape character, the Saham Toney Parish Landscape Character Assessment, January 2019 clearly highlights that the gaps between settlement clusters in the area in which site STNP1 is located are one of the most important contributions to visual landscape value in that area. Therefore, it is entirely justified for them to be maintained.

15.2.1.2 With regard to the area set aside for flood attenuation measures, the draft site allocation policy does include that as part of the site; the responder has misinterpreted the policy in that respect and no change is required.

15.2.1.3 The site allocation policy criterion dealing with future access beyond the site area will be modified to allow such access for agricultural purposes only.

15.2.1.4 A policy criterion requiring a Landscape and Visual Impact Assessment for sites in this area is recommended and justified by the Saham Toney Parish Landscape Character Assessment, January 2019. The responder highlights a wish to consider site STNP1 in combination with other nearby allocated sites, and so that assessment could and should be done for the group of sites. If site STNP1 were the only site

allocated in the area it might be possible to waive the criterion, as clearly redevelopment of a largely brownfield site is unlikely, on its own, to have significant landscape impact.

15.2.2 Sites STNP456 and STNP7: Constraint conditioning resulted in a reduction in capacity with respect to that proposed for site STNP 4, and a reduction in both size and capacity with respect to that proposed for sites STNP5 and STNP 7. Sites STNP4, STNP5 and STNP6 were also merged as a single site. The owners were unwilling to merge the sites because although ownership is in the same family, it is with different members of the family; and because they wished to develop the sites at different times. In the light of that, the Local Planning Authority advised it would be unreasonable to merge the sites, and hence they were reinstated as three individual sites. The two reasons for the reductions in site sizes and / or capacities were:

- a) The constraint identified by the Local Highways Authority limiting overall capacity of the four sites to 25 dwellings due to concerns about the capacity of the road junction between Pound Hill and Richmond Road; and
- b) The constraint identified by site assessment and constraint condition regarding landscape impact, particularly that of site STNP5.

It was verbally agreed at a meeting with the owners that the highways constraint could be addressed by:

- 1) Phasing the development of the sites over the entire period of the Neighbourhood Plan (i.e. from 2020 to 2036), with no one site exceeding the limiting number of 25 dwellings; and
- 2) A policy requirement for a professional traffic impact report to be prepared for each site at the time of a planning application, with support for such an application at that stage requiring those reports to demonstrate adequate capacity at the road junction in question.

This allowed the capacity of site STNP4 to be increased to 13 dwellings.

With regard to site STNP5, the owners felt that its proposed reduction in both size and capacity (to 4 dwellings), was not justified by the level of landscape impact. The two principle aspects of that impact were the potential loss of a key view, as defined by the Neighbourhood Plan, from Pound Hill to Saham Mere; and the potential closure of gaps between settlement clusters in the area. By careful mutual re-examination of both, a solution was found that avoided both of those impacts. That, combined with the mitigation of the highway constraint, allowed the original site boundary to be re-instated (subject to an area of no above-ground development, to respect the key view), and its capacity to be increased to 12 dwellings. See Figure 16 for details.

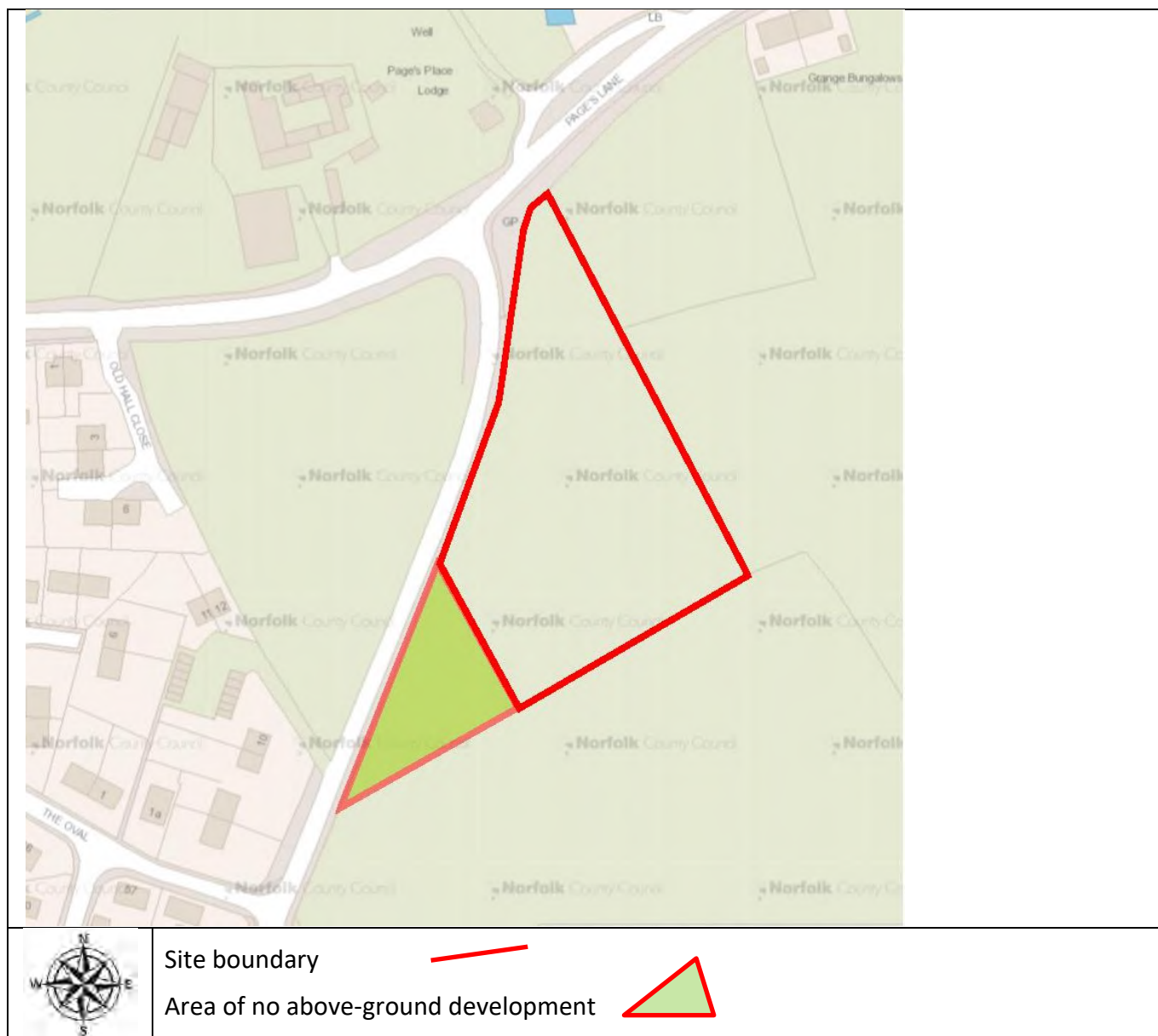


Fig. 16: Site STNP5 revised boundary

The owners of site STNP7 considered that the post-constraint conditioning proposal to limit the site to its brownfield footprint and reduce its capacity to 6 dwellings (from 35) would mean it would not be viable to develop, due to the likely high costs to remove the existing buildings and hard standings and clean up and decontaminate the site. A solution was initially agreed whereby the site was extended to include a small area of greenfield land, allowing its capacity to be increased to 8 dwellings. See Figure 17 for details.



Fig. 17: Site STNP7 revised boundary

15.2.3 As a result of the changes to sites STNP5 and 7, it was necessary to again review the cumulative landscape assessment for sites STNP4, 5 and 6 described in section 13. By reference to the tables presented in section 13:

- Combined landscape sensitivity (Table 48) remains moderate to high;
- Indicators of value (Tables 49 and 50) are unchanged;
- Scope for mitigation (13.14) remains good, though that becomes more borderline than the original case;
- Overall landscape sensitivity (Table 51) remains moderate, providing the area of no above-ground development for STNP5 is adhered to and houses there are designed and set out in a manner sympathetic to landscape sensitivity (possibly with a limit to single-storey dwellings);
- That being the case, landscape capacity (Table 52) remains moderate;
- The landscape value assessment (Table 53) is unchanged;

- Providing the area of no above-ground development for STNP5 is adhered to and houses there are designed and set out in a manner sympathetic to landscape sensitivity (possibly with a limit to single-storey dwellings), the magnitude of change (Table 54) remains low;
- Impact significance (Table 55) thus remains low to moderate;
- As a result of the above the conclusion previously drawn from Table 56 and described in 13.22 is unchanged; i.e. sites STNP4, 5 and 6 have low-moderate combined landscape impact significance that would be acceptable, but that carefully designed, and sympathetic landscape impact mitigation measures will be required. A full professional Landscape and Visual Impact Assessment will be a policy requirement for each of the sites to confirm the findings of this review and to provide comprehensive recommendations for mitigation measures. However, given the increased site capacity, particularly of site STNP5, the acceptability of the landscape impact significance is only borderline for this case, which further emphasises the need for the measures specified in the draft site policies.

15.2.4 After discussion with the owners of sites STNP4, 5, 6 and 7 the amendments described above were incorporated in revised draft allocation policies for the sites. The owners subsequently made further comments to those and requested the following:

- a) An increase in combined capacity of the four sites from 38 to 62, including in the case of sites STNP4, 5 and 6 higher capacities originally proposed by the owners via the call for sites;
- b) Development of all four sites during the first four years of the plan period;
- c) Removal of draft allocation policy criteria relating to the submission of landscape and visual impact assessments, the submission of transport study reports, the submission of full ecological appraisals, measures to deal with utility infrastructure crossing the sites, wildlife and biodiversity friendly measures and measures to preserve and enhance green infrastructure

The increased site capacities suggested by the owners were not considered in the four independent and professional site assessments described in section 3. It is not possible for the four organisations to repeat their assessment, but based on them it is considered that the following key findings would have emerged from such repeat assessments:

15.2.4.1 Lead Local Flood Authority: Assessment conclusions unlikely to change.

15.2.4.2 Anglian Water: Assessment conclusions unlikely to change.

15.2.4.3 Local Highways Authority: The provisional mitigation (subject to Highways Authority acceptance at consultation) to the limit imposed on capacity for the four sites (no more than 25 dwellings) would no longer apply as the owners' final proposal eliminates the foundation of that mitigation (i.e. development phased over 16 years and transport impact studies to be submitted with any future planning application). Thus, under the owners' final proposal the four sites would have a non-mitigated and significant constraint, and would not qualify for the site selection process.

15.2.4.4 AECOM: Using the same approach and logic used by AECOM in its detailed site assessments, a revised assessment table for the four sites is given

		ASSESSMENT UNDERTAKEN SIMILARLY TO AECOM's																				
CONSTRAINT		Land type	Location relative to settlement boundary	Highway access	Accessibility	Environmental designations	Ecology value	Landscape sensitivity	Agricultural land loss	Heritage impact	Location	TPO's on site	Impact on habitats and biodiversity	Public right of way	Social or community value	Ground contamination	Infrastructure crossing site	Utility access	Coalescence with neighbouring towns	Size & character of development	Amenity	OVERALL RATING
STNP4	G	Green	Yellow	Green	Yellow	Green	Yellow	Red	Yellow	Green	Red	Green	Yellow	Green	Green	Green	Yellow	Green	Red	Red	Green	Red
STNP5	G	Red	Yellow	Green	Green	Yellow	Yellow	Yellow	Yellow	Green	Red	Green	Yellow	Green	Green	Green	Yellow	Green	Red	Red	Green	Yellow
STNP6	G	Green	Yellow	Green	Green	Yellow	Yellow	Red	Yellow	Yellow	Red	Green	Yellow	Green	Green	Green	Yellow	Green	Red	Yellow	Green	Red
STNP7	M	Green	Yellow	Green	Green	Yellow	Yellow	Red	Yellow	Yellow	Red	Green	Yellow	Green	Green	Green	Yellow	Green	Yellow	Yellow	Green	Yellow

Table 66: Revised “Traffic Light” Assessment of Sites STNP4-7

Note: The symbol  indicates a reduced traffic light rating by comparison with the original AECOM assessment.

15.2.4.5 Based on the above re-interpretation of the four independent site assessments there is no justification to reconsider the site ratings and rankings for the increased site capacities proposed by the owners, as sites STNP4-7 do not rate as “suitable for development” with regard to some fundamental assessment constraints when those proposed increased capacities are taken into account.

15.2.4.6 Furthermore, again repeating cumulative landscape assessment given in section 13, based on the owners' final proposed site capacities and requested changes to policy criteria, the conclusions are as follows:

- Combined landscape sensitivity (Table 48) remains moderate to high;
- Indicators of value (Tables 49 and 50) are unchanged;
- Scope for mitigation (13.14) reduces to moderate;
- Overall landscape sensitivity (Table 51) increases to moderate to high, providing the area of no above-ground development for STNP5 is adhered to and houses there are designed and set out in a manner sympathetic to landscape sensitivity (possibly with a limit to single-storey dwellings);
- That being the case, landscape capacity (Table 52) reduces to low to moderate;
- The landscape value assessment (Table 53) is unchanged;
- Providing the area of no above-ground development for STNP5 is adhered to and houses there are designed and set out in a manner sympathetic to landscape sensitivity (possibly with a limit to single-storey dwellings), the magnitude of change (Table 54) increases to moderate;
- Impact significance (Table 55) thus increases to moderate to high;

- The interpretation and implications of a moderate to high impact significance are described in Table 56 as follows:

The proposals are at considerable variance with the landform, scale and pattern of the landscape.

- ❖ *They are visually intrusive and would disrupt fine and valued views of the area;*
- ❖ *They are likely to degrade, diminish or even destroy the integrity of a range of characteristic features and elements of their setting;*
- ❖ *They would be substantially damaging to a high quality or highly vulnerable landscape, resulting in fundamental change and be considerably diminished in quality;*
- ❖ *They cannot be adequately mitigated for.*

Given the above, the proposed increased site capacities are unacceptable with regard to landscape impact and this is a further reason why sites STNP4-7 do not warrant re-rating against the site selection criteria.

15.2.4.7 As a result of the reassessments described above it is concluded that there is no justification to include the owners' proposed increased site capacities and revised criteria in the respective site allocation policies, and therefore those policies will reflect the parameters described in 15.2.2.

15.3 Site STNP16: Discussions with the site owner established a preference to develop 12 houses on a reduced area site in conjunction with his immediately adjacent site with outline permission for 5 houses (Ref. application 3PL/2018/0563/O); rather than develop 17 houses on the originally proposed site and designate the permitted site as amenity land. The revised site plan is shown below:

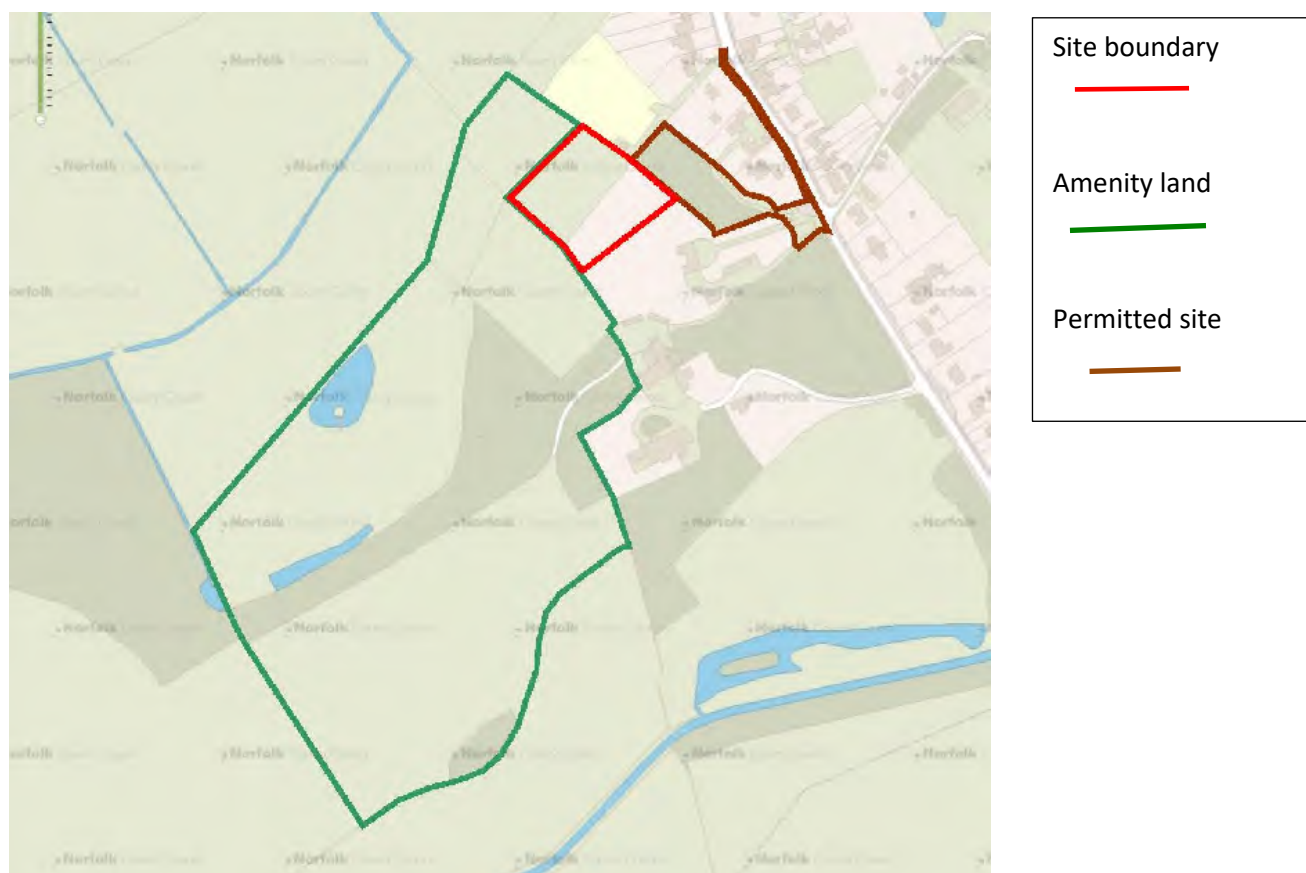


Fig. 18: Amended Site Boundary for Site STNP16

Since the site will be developed in conjunction with the adjacent one having the benefit of existing permission the total number of houses remains 17 so the site's rating against scale and landscape character criteria are not changed and its overall rating remains the same.

15.4 Prior to the pre-submission of the Neighbourhood Plan, the Breckland Council Neighbourhood Planning co-ordinator and a planning development officer made informal comments on the Neighbourhood Plan that led to two changes in terms of site allocations:

- a) Site STNP14 was reoriented so that it runs parallel to the highway, rather than at right-angles to it. This was to overcome concern about it being out of character development extending back into the countryside. The site owner agreed to this change;
- b) Due to some concerns about low density of certain sites, in agreement with the site owner, the capacity of site STNP15 was increased from 4 to 6 houses. That remained less than the original number proposed (8) which had formed the basis of the independent site assessments.

16.0 FINAL PRE-SUBMISSION SITE SELECTION

16.1 The amendments agreed with site owners as explained in section 15 resulted in some changes to the site ratings table which are shown in red text in Table 66. The resulting changes to the overall site ratings and rankings are shown in red text Table 67.

Table 66: Revised Rating of Sites Against Selection Criteria	No of Houses Proposed	Site area (ha)	Site density (dph)	Distance to a bus stop	Distance to services / facilities	Housing mix vs Needs Assessment	Maintain amenity	Heritage asset setting	Density	Highway access - visibility	Highway access - width & footpaths	Scale & location vs character area & sensitivity	Impact on landscape character	Preserve / incorporate key views	No undesirable loss of biodiversity	Flood risk - sequential test	Appropriate surface water drainage mitigation measures	Loss of undeveloped land	Loss of agricultural land	Improve quality / quantity of open space
POLICY				1		2D	3A		3B	3C		7A		7B	7D	8	ENV09	OBJECTIVE		
CRITERIA				1a	1b	1	1	2	1	1a	1b	1a	1b	1	1	1	2	1a	1b	13
WEIGHT				3	3	4	2	2	2	5	5	4	4	4	2	5	3	1	1	2
SITE ID ↓	Max possible score			3	3	2	2	2	2	3	4	2	4	2	2	2	4	4	2	2
STNP1	10	0.98	10.2	1	-1	2	1	0	2	2	3	1	2	1	-1	1	3	2	1	0
STNP2	4	0.5	8.0	-1	-1	2	0	0	2	2	2	2	4	0	-1	2	4	3	1	0
STNP4	13	0.813	16.0	3	-1	2	0	-1	0	1	4	-1	1	0	-1	1	3	0	1	0
STNP5	12	0.35	16.0	3	-1	2	0	0	0	1	4	-1	2	-1	-1	1	3	0	1	0
STNP6	5	0.46	10.9	3	-1	0	0	-1	2	1	4	0	2	0	-1	1	3	0	1	0
STNP7	8	0.54	14.8	3	-1	-1	0	-1	0	2	3	1	4	0	-1	1	2	3	-1	0
STNP9	3	0.445	6.7	-1	0	-1	0	-1	2	3	3	0	3	0	-1	-1	3	0	1	0
STNP13	5	0.2	25.0	-1	-1	0	-1	0	-1	1	1	0	3	0	-1	2	4	0	2	0
STNP14	5	0.3	16.7	-1	-1	0	0	0	0	1	1	0	3	0	0	2	4	0	-1	0
STNP15	6	0.4	15.0	3	-1	0	0	-1	1	1	4	-1	1	0	-1	1	3	1	2	0
STNP16	12	0.65	18.5	1	1	0	-1	0	2	2	3	-1	1	0	-1	2	4	1	2	2
STNP3, 8, 10, 11, 12	Not re-rated: withdrawn or eliminated from the process (see 12.3 and section 15)																			

	Sites withdrawn or eliminated
	Neighbourhood Plan policy criteria

	Local Plan Policy criterion
	Local Plan sustainability objective

WEIGHTED RESULTS TABLE			RANKED RATINGS		
SITE ID	SCORE	HOUSES	RANK	SITE ID	SCORE
STNP1	70	10	1	STNP2	74
STNP2	74	4	2	STNP1	70
STNP4	50	13	3	STNP16	60
STNP5	52	12	4	STNP7	56
STNP6	54	5	5	STNP6	54
STNP7	56	8	6	STNP5	52
STNP9	40	3	7	STNP4	50
STNP13	34	5	8	STNP15	46
STNP14	37	5	9	STNP9	40
STNP15	46	4	10	STNP14	37
STNP16	60	17	11	STNP13	34
Max. possible score = 104					

Table 67: Weighted Results Table and Site Rankings Following Interface with Site Owners

16.2 A map showing the location of the sites allocated in the pre-submission version of the Neighbourhood Plan is given below in Figure 19.

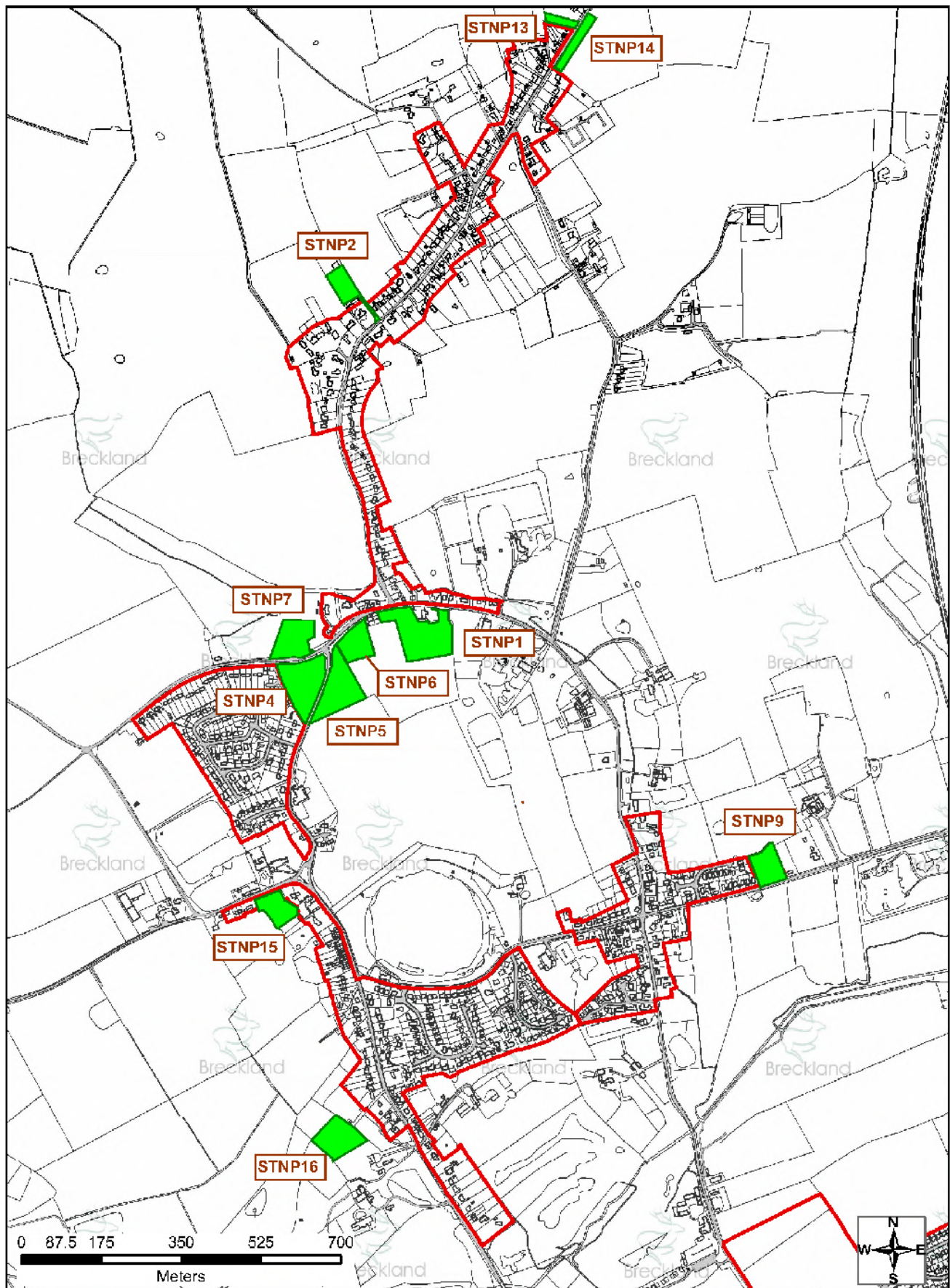


Fig. 19: Sites Allocated in the Pre-Submission Neighbourhood Plan

17.0 PRE-SUBMISSION POLICY CONDITIONS FOR SELECTED SITES

17.1 This selection process has identified a variety of constraints and issues that while not precluding sites from being selected, must be dealt with in allocated site policies in the Saham Toney Neighbourhood Plan. The criteria for doing that are fully defined and explained in the Neighbourhood Plan, but for convenience are summarised in Table 68.

Constraint Description	Relevant Allocated Sites
Highway Access	STNP1: LHA conditions to 3PL/2015/1430/F STNP2: LHA conditions to 3PL/2015/0009/F STNP9: Driveway access per indicative layout
Accessibility	STNP1: Footpath linking to the existing one on Page's Lane STNP7: Footpath provision STNP9: Footpath provision along site frontage STNP16: Footpath as condition to 3PL/2018/0563/O
Flood Risk Mitigation	STNP1, STNP7, STNP9
Flood Risk – Non-Standard Information with Application (LLFA)	STNP7
Ecological Appraisal and Mitigation Measures	All allocated sites
Landscape and Visual Impact Assessment	STNP1, STNP4, STNP5, STNP6, STNP7, STNP16
Landscape mitigation	STNP4, STNP5, STNP6, STNP16
Preservation of Key View	STNP6, STNP7
Retention of Boundary Trees and Hedges	STNP6
Heritage Asset Setting	STNP4, STNP5, STNP6, STNP7
Biodiversity/ Nature Friendly Measures	All allocated sites
Sympathetic Landscaping	All allocated sites
Ground Contamination Risk Assessment, Based on A Full Intrusive Ground Investigation	STNP1, STNP2, STNP7, STNP14
Infrastructure Mitigation	All allocated sites
Amenity	STNP13 (Farm disturbance)
Amenity Land Provision	STNP16
Highway Widening / Passing Places	STNP13, STNP14
Anglian Water Constraints: Assets Affected	STNP6, STNP13
Anglian Water Constraints: Used Water Network and Water Recycling Centre Capacity	Anglian Water to be requested to re-review against final list of allocated sites as part of a Regulation 14 consultation

Table 68. Summary of Policy Conditions

18.0 TIMING OF DEVELOPMENT

18.1 Where full agreement has been reached with site owners, those sites are deemed deliverable and the expected development timing given in the Neighbourhood Plan may be within the first five years of the Plan period (i.e. 2019-2024), as guided by the National Planning Policy Framework. The sites for which there is full agreement with the owners are STNP2, STNP9, STNP13, STNP14 and STNP15. In those case delivery phasing as set out in the Neighbourhood Plan is guided by the owners' wishes (not all want their site to be developed in the first five years of the plan period).

18.2 For the remaining allocated sites (STNP1, STNP4, STNP5, STNP6, STNP7 and STNP16) full agreement on allocation policies is yet to be reached with the respective owners. As a result, none of those sites can be given an expected delivery period within the first five years of the Neighbourhood Plan period. They have been assigned delivery periods that result in reasonably even phasing of development over the remaining period of the plan (i.e. 2025-2036). Should agreement on policies subsequently be reached with the owners, phasing may be reconsidered at a future submission of the Neighbourhood Plan.

19.0 UNDECIDED PLANNING APPLICATIONS

19.1 At the time of completing this report (early August 2019) there are three undecided planning applications for residential housing developments:

- a) 3PL/2019/0010/F: 54 houses at Nilefields. This site was independently assessed by AECOM and the conclusion of that assessment was that the site is unsuitable for development. See the AECOM Site ASSESSMENT REPORT for full details. No further consideration of this site is required.
- b) 3PL/2019/0748/O: 1 house at 171 Hills Road. The proposed site is outside and remote from the Saham Toney settlement boundary. It therefore is non-compliant with fundamental policy requirements of both the emerging Local and Neighbourhood Plans: i.e. that residential developments shall only be permitted within or immediately adjacent to the settlement boundary unless exception rules apply (which they do not in this case). Therefore, this site is deemed unsuitable for development and is given no further consideration in the site selection process.
- c) 3PL/2019/0808/D: 4 houses at Saham Tythe Barn, off Chequers Lane. The proposed site is outside and remote from the Saham Toney settlement boundary. It therefore is non-compliant with fundamental policy requirements of both the emerging Local and Neighbourhood Plans: i.e. that residential developments shall only be permitted within or immediately adjacent to the settlement boundary unless exception rules apply (which they do not in this case). Therefore, this site is deemed unsuitable for development and is given no further consideration in the site selection process.

20.0 SUMMARY OF SITE ASSESSMENT & PRE-SUBMISSION SELECTION FINDINGS BY SITE

Table 69 summarises the overall findings for each proposed site of both this report and the AECOM Site Assessment Report.

SITE	SUMMARY FINDINGS
STNP1	Suitable for the allocation of 10 dwellings (as proposed) subject to policy criteria and modification of the site boundary to maintain separation between settlement clusters. Not yet considered deliverable and hence not allocated in the first five years of the Neighbourhood Plan since agreement has still to be reached with the site owners on policy criteria
STNP2	Suitable for the allocation of 4 dwellings (as proposed) subject to policy criteria. Considered deliverable within the first five years of the Neighbourhood Plan since agreement has been reached with the site owner on policy criteria
STNP3	Not suitable for allocation due to flood risk constraints identified by the Lead Local Flood Authority. Withdrawn by the owner

STNP4	Suitable for the allocation of 13 dwellings (12-15 proposed) subject to policy criteria. Not yet considered deliverable and hence not allocated in the first five years of the Neighbourhood Plan since agreement has still to be reached with the site owners on policy criteria Not suitable for the allocation of 18 dwellings as subsequently suggested by the owner due to (a) unacceptable landscape impact in combination with adjacent allocated sites, and (b) a constraint imposed on the overall capacity of sites STNP4-7 by the Local Highway Authority
STNP5	Suitable for the allocation of 12 dwellings (12-15 proposed) subject to policy criteria. Not yet considered deliverable and hence not allocated in the first five years of the Neighbourhood Plan since agreement has still to be reached with the site owners on policy criteria Not suitable for the allocation of 22 dwellings as subsequently suggested by the owner due to (a) unacceptable landscape impact in combination with adjacent allocated sites, and (b) a constraint imposed on the overall capacity of sites STNP4-7 by the Local Highway Authority
STNP6	Suitable for the allocation of 5 dwellings (5-6 proposed) subject to policy criteria. Not yet considered deliverable and hence not allocated in the first five years of the Neighbourhood Plan since agreement has still to be reached with the site owners on policy criteria Not suitable for the allocation of 10 dwellings as subsequently suggested by the owner due to (a) unacceptable landscape impact in combination with adjacent allocated sites, and (b) a constraint imposed on the overall capacity of sites STNP4-7 by the Local Highway Authority
STNP7	Suitable for the allocation of 8 dwellings (30-35 proposed) subject to policy criteria and a reduction of the site size to approximately 0.54 hectares. Not yet considered deliverable and hence not allocated in the first five years of the Neighbourhood Plan since agreement has still to be reached with the site owners on policy criteria Not suitable for the allocation of 12 dwellings as subsequently suggested by the owner due to (a) a constraint imposed on the overall capacity of sites STNP4-7 by the Local Highway Authority, (b) lack of justification for the revised proposal, and (c) the removal of the policy criteria that caused the owners to propose a higher capacity
STNP8	Not suitable for allocation due to constraints identified by the Local Highway Authority and a negative overall rating in the site selection process. Withdrawn by the owner
STNP9	Suitable for the allocation of 3 dwellings (as proposed) subject to policy criteria. Considered deliverable within the first five years of the Neighbourhood Plan since agreement has been reached with the site owner on policy criteria
STNP10	Not suitable for allocation due to constraints identified by the Local Highway Authority and the Lead Local Flood Authority, and a negative overall rating in the site selection process
STNP11	Potentially suitable for the allocation of 2 dwellings (as proposed), but withdrawn by mutual agreement with the owner in favour of alternate option STNP15 (for viability reasons)
STNP12	Potentially suitable for the allocation of 5 dwellings (as proposed), but withdrawn by mutual agreement with the owner in favour of alternate option STNP16 which achieved a better overall rating in the site selection process

STNP13	Suitable for the allocation of 5 dwellings (as proposed) subject to policy criteria. Considered deliverable within the first five years of the Neighbourhood Plan since agreement has been reached with the site owner on policy criteria
STNP14	Suitable for the allocation of 5 dwellings (as proposed) subject to policy criteria. Considered deliverable within the first five years of the Neighbourhood Plan since agreement has been reached with the site owner on policy criteria
STNP15	Suitable for the allocation of 6 dwellings (4-8 proposed) subject to policy criteria. Considered deliverable within the first five years of the Neighbourhood Plan since agreement has been reached with the site owner on policy criteria
STNP16	Suitable for the allocation of 12 dwellings (up to 35 proposed) subject to policy criteria, a reduction in site size to approximately 0.65 hectares, and its future development in conjunction with the adjacent site with outline permission for 5 dwellings (Ref. application 3PL/2018/0563/O). Considered deliverable within the first five years of the Neighbourhood Plan since agreement has been reached with the site owner on policy criteria
3PL/2019/0010/F	Nilefields site, Swaffham Road. Assessed as unsuitable for allocation by the AECOM site assessment
3PL/2019/0011/F	Meadow Farm site, Chequers Lane. Assessed as unsuitable for allocation by the AECOM site assessment
3PL/2019/0748/O	Site at 171 Hills Road. Unsuitable for allocation due to its remoteness from the settlement boundary (contravenes fundamental policies of the Local and Neighbourhood Plans)
3PL/2019/0808/D	Site at Saham Tythe Barn, Chequers Lane. Unsuitable for allocation due to its remoteness from the settlement boundary (contravenes fundamental policies of the Local and Neighbourhood Plans)

Table 69: Summary Findings for Each Site at Pre-Submission Stage

21.0 PRE-SUBMISSION CONCLUSIONS

The detailed reviews and assessments given in this report demonstrate that the following sites are suitable for development and may therefore be allocated in the pre-submission version of the Saham Toney Neighbourhood Plan:

Site	Number of dwellings		Site	Number of dwellings
STNP1	10		STNP9	3
STNP2	4		STNP13	5
STNP4	13		STNP14	5
STNP5	12		STNP15	6
STNP6	5		STNP16	12
STNP7	8		TOTAL	83

Table 70: Pre-Submission Site Allocations

APPENDIX A TO PART ONE: DETAILS OF SITES PUT FORWARD IN RESPONSE TO A CALL FOR SITES

Full proposal forms as submitted are not included as they contain personal data, but are available to the Local Planning Authority or Neighbourhood Plan examiner upon request. The key information for each site is summarised in Table 71. Relevant drawings submitted are also given for each site. Site photos may be found in the AECOM Site Assessment Report, July 2019.

SITE ID	LOCATION	MIN No. OF HOUSES PROPOSED	MAX No. OF HOUSES PROPOSED	SITE AREA (ha)	No. OF BEDS PROPOSED	TIMING PROPOSED
STNP1	Grange Farm Piggery, Chequers Lane	10	10	0.98	3	2019-24
STNP2	The Croft Piggery (disused), Hills Road	4	4	0.5	3	2019-24
STNP3	Junction of Hills Road & Ploughboy Lane	4	4	0.246	2 & 3	2019-24
STNP4	Junction of Pound Hill & Page's Lane	12	15	0.813	1-3	2019-24
STNP5	Pound Hill East	12	15	1.014	1-3	2019-24
STNP6	Page's Lane East, near Pound Hill junction	5	6	0.46	t.b.c.	2019-24
STNP7	Page's Lane Farm	30	35	1.86	1-4	2019-32
STNP8	Hills Road South West	40	50	2.59	1-4	2019-36
STNP9	Ovington Road	3	3	0.445	2, 3 & 4	2019-20
STNP10	Behind 129 & 131 Hills Road	20	20	1.6	2 & 3	t.b.c.
STNP11	8 Richmond Road, east part plot	2	2	0.15	3	2025-36
STNP12	Richmond Hall	5	5	0.24	1-4	2019-24
STNP13	Hill Farm, Hills Road	4	5	0.2	t.b.c.	2019-24
STNP14	Croft Field, Hills Road	5	5	0.3	t.b.c.	2019-24
STNP15	8 Richmond Road, full plot	4	8	0.4	t.b.c.	2025-36
STNP16	Richmond Hall	20	35	3.48	t.b.c.	2025-36

Table 71: Proposed Sites Summary Information

STNP1: GRANGE FARM PIGGERY



Fig. A1: STNP1 Site Plan



Fig. A2: STNP1 Indicative Site Layout

STNP2: CROFT PIGGERY

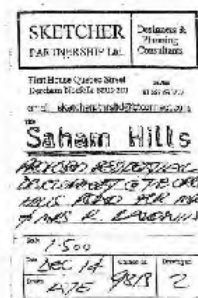
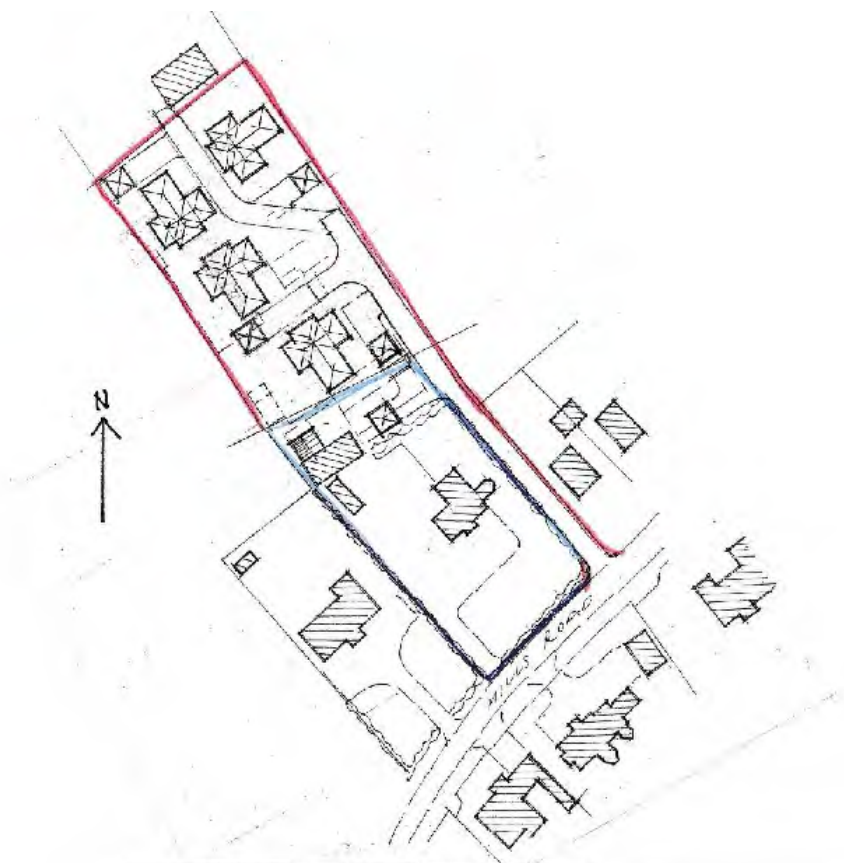


Fig. A3: STNP2 Site Plan and Indicative Layout

STNP3: LAND AT THE JUNCTION OF HILLS ROAD AND PLOUGHBOY LANE

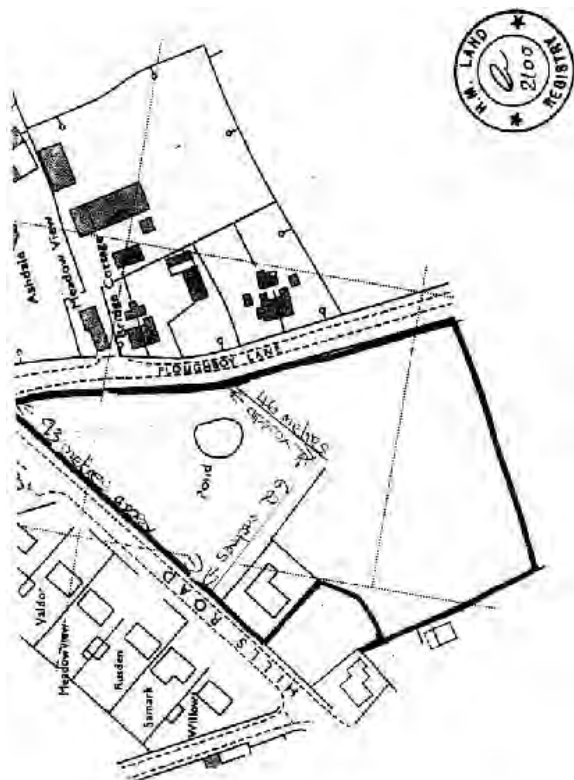


Fig. A4: STNP3 Site Plan

[illegible]

STNP5: POUND HILL EAST

[illegible]

Page 149 of 201

The map shows a rural landscape with several buildings and roads. A large rectangular area is outlined in red and labeled 'O-46 Ha.'. Other buildings are labeled with names like 'Old Manor', 'Rond', 'Meadside', 'Grange Bungalow', 'The Grange', and 'Rd Farm'. Roads are labeled 'A100' and 'A101'. The map also shows a river and a bridge.

STNP7: PAGE'S FARM



Page 150 of 201

STNP8: HILLS ROAD, SOUTH-WEST

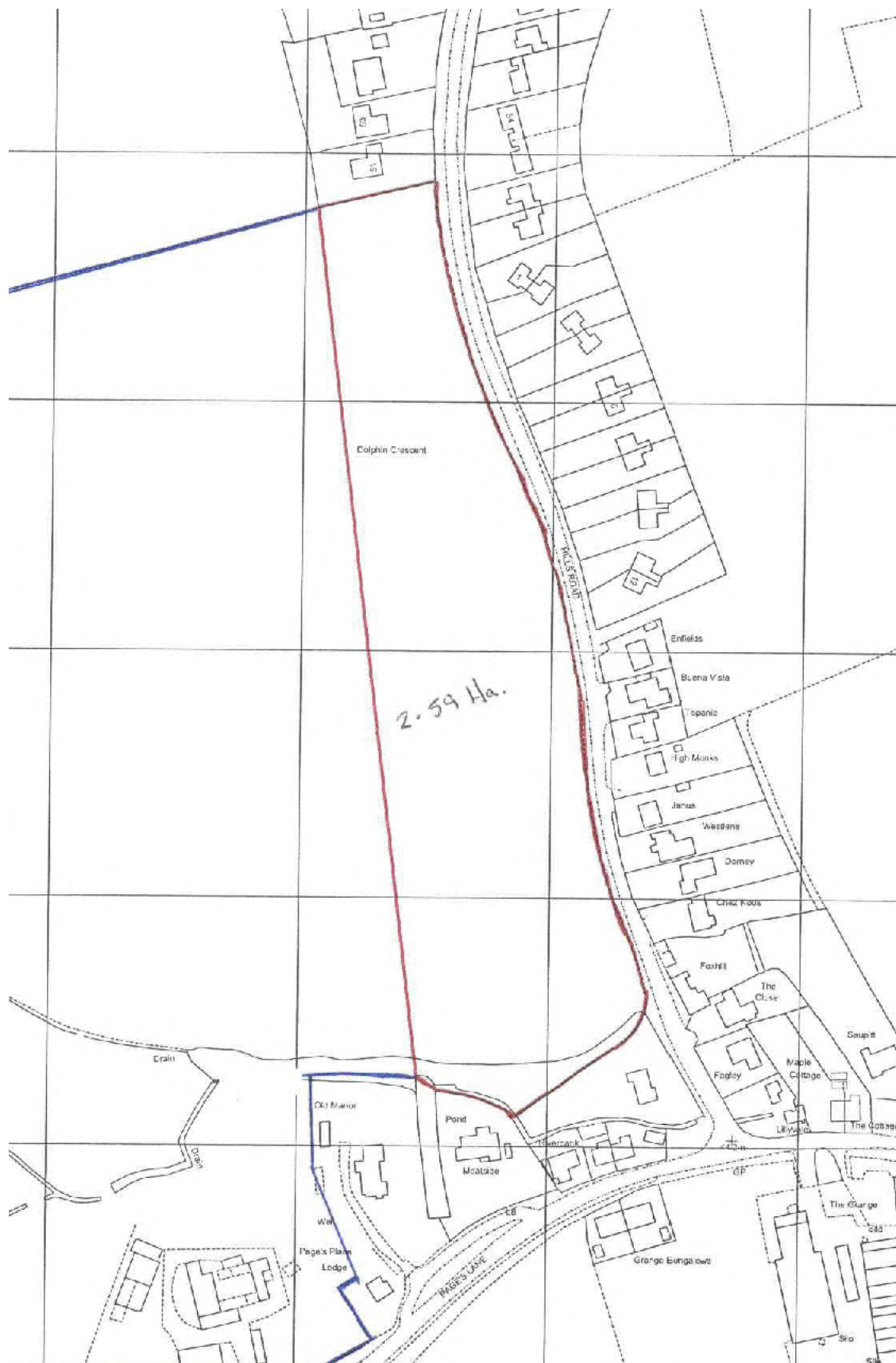


Fig. A9: STNP8 Site Plan



Fig. A10: STNP9 Site Plan And Indicative Layout

STNP10: LAND BEHIND 129/131 HILLS ROAD

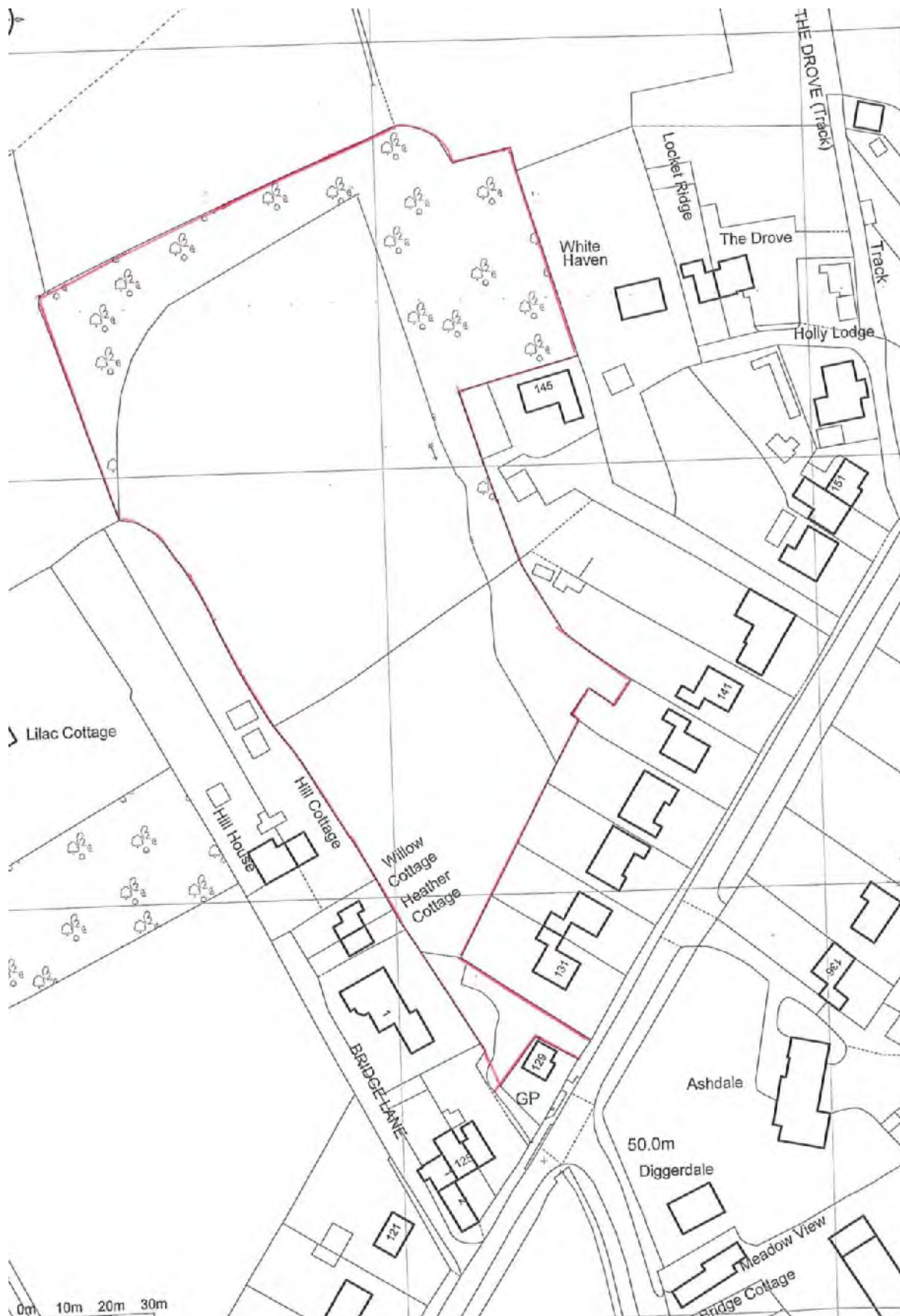


Fig. A11: STNP10 Site Plan

STNP11: 8, RICHMOND ROAD (OPTION 1)

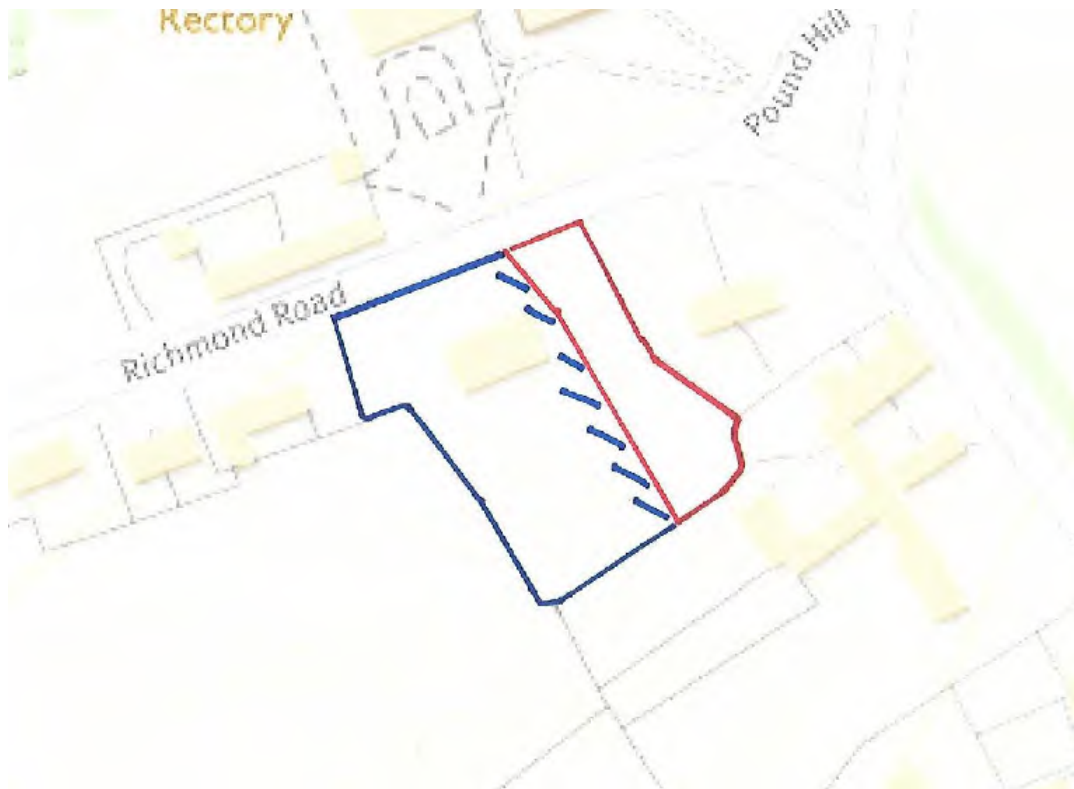


Fig. A12: STNP11 Site Plan

STNP12: RICHMOND HALL (OPTION 1)

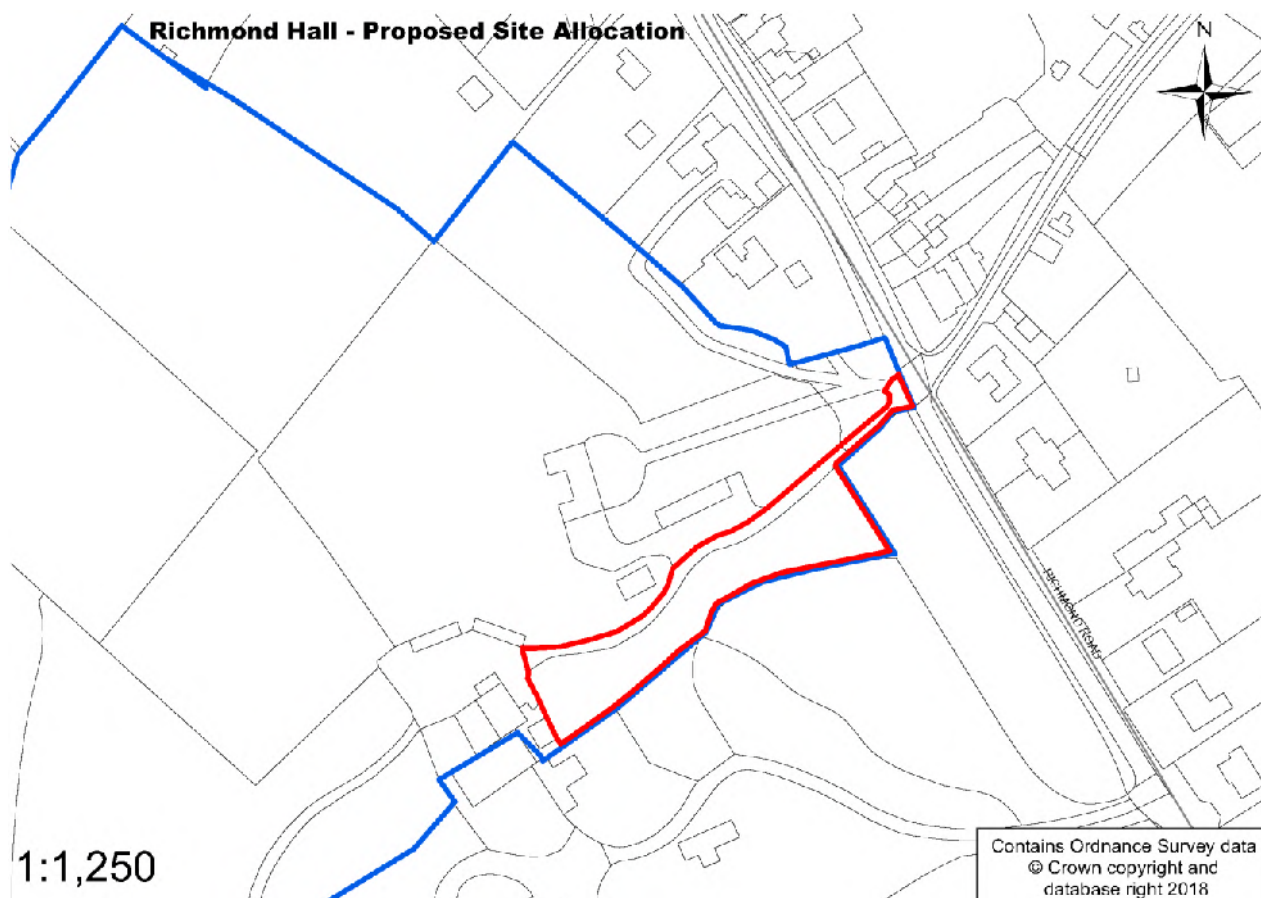


Fig. A13: STNP12 Site Plan

STNP13: HILL FARM, HILLS ROAD

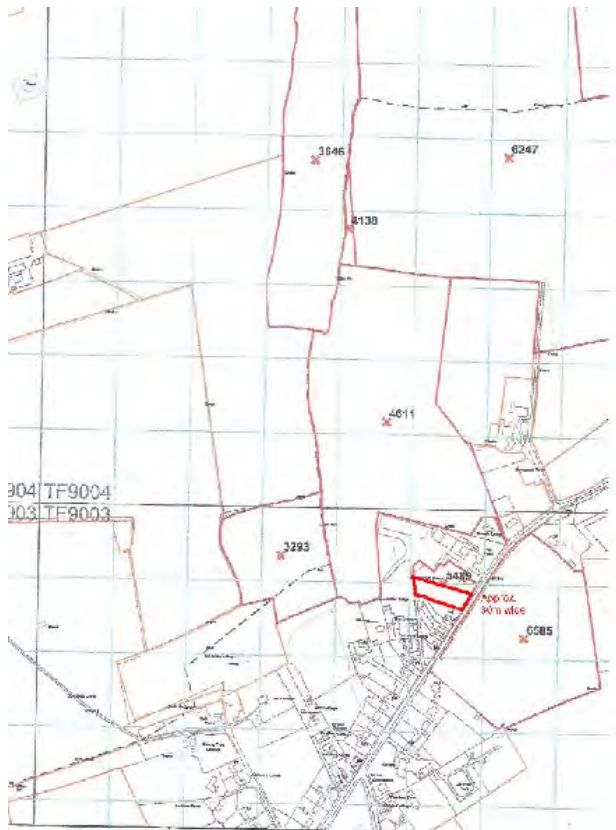


Fig. A14: STNP13 Site Plan

STNP14: CROFT FIELD, HILLS ROAD



Fig. A15: STNP14 Site Plan

STNP15: 8, RICHMOND ROAD (OPTION 2)

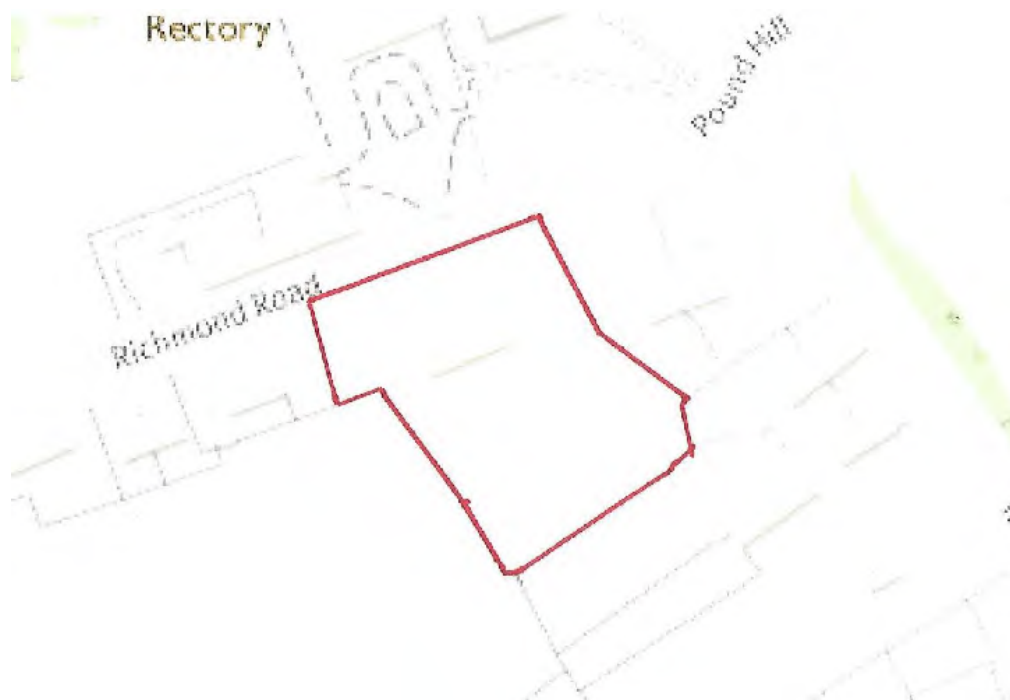


Fig. A16: STNP15 Site Plan

STNP16: RICHMOND HALL (OPTION 2)

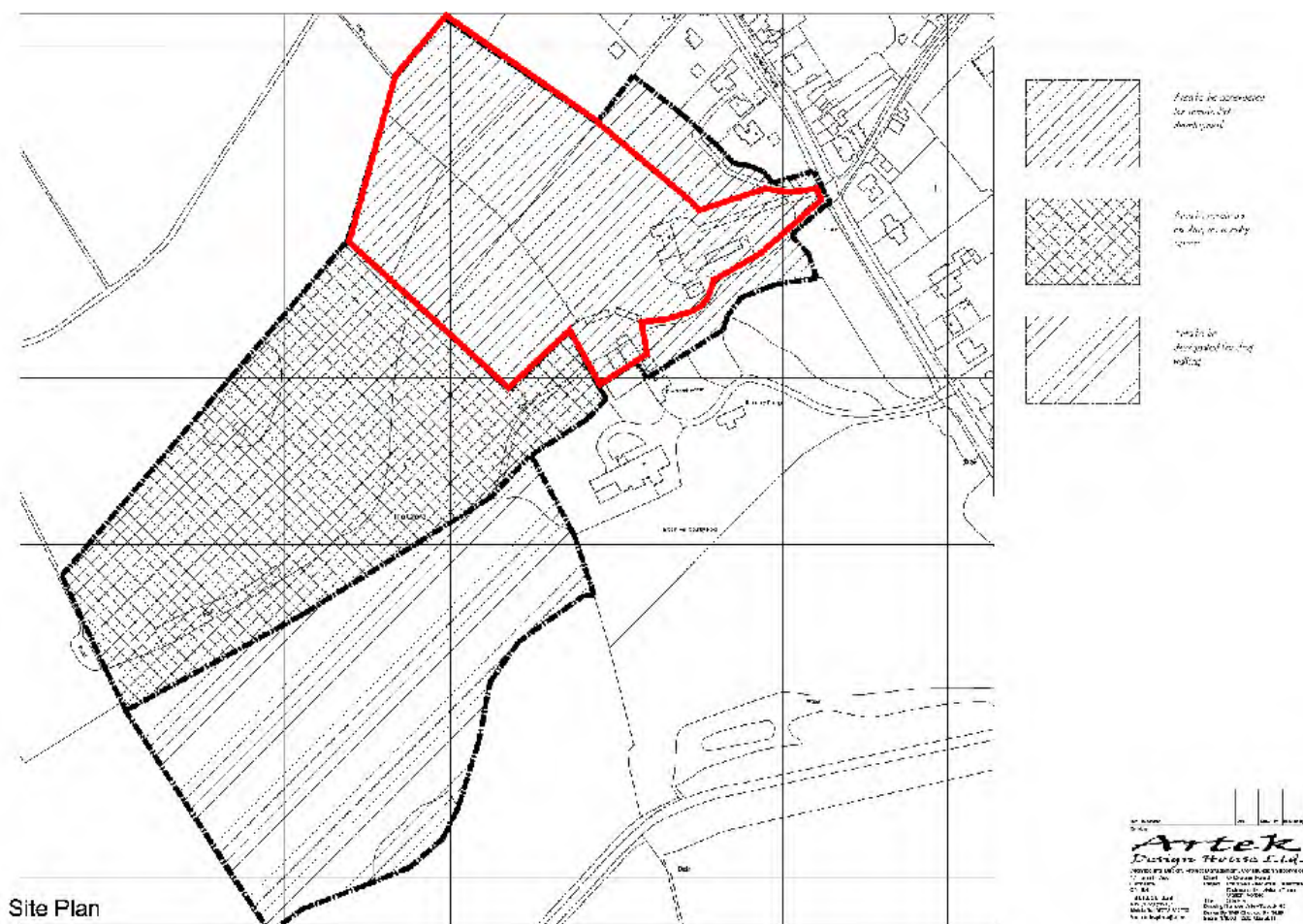


Fig. A17: STNP16 Site Plan

APPENDIX B TO PART ONE: INFORMATION RELATING TO THE CONDITIONING OF SITE CONSTRAINTS

B1: STNP1, AECOM highway access constraint



Fig. B1: Indicative site layout included with site proposal, showing proposed new site access

Jemima Dean
Breckland Council
Elizabeth House
Walpole Loke
Dereham
Norfolk
NR19 1EE

NCC contact number: 0344 800 8020
Textphone: 0344 800 8011

Your Ref: 3PL/2015/1430/F
Date: 4 January 2016

My Ref: 9/3/15/1430
Tel No: 01362 656211
Email: kay.gordon@norfolk.gov.uk

Dear Ms Dean

Saham Toney: Demolition of all existing buildings and erection of 10 dwellings and garages and associated works
Land at Grange Farm Chequers Lane IP25 7HH

Thank you for consulting me in respect of the above application.

You will be aware that this Authority has previously raised no objections in principle to residential development in this location subject to certain off-site highway being carried out.

The current submission appears unchanged from that submitted under ref 3PL/2014/1340 and therefore my highway advice remains as given 11 August 2015 namely that it is considered that the off-site highway works mitigate the scale of development proposed and, should planning approval be granted, this Authority would require the following conditions be imposed :-

SHC 20 (Variation)

Prior to the first occupation of the development hereby permitted visibility splays measuring 2.4m x 59m shall be provided to each side of the access where it meets the highway and such splays shall thereafter be maintained at all times free from any obstruction exceeding 0.6m above the level of the adjacent highway carriageway.

Reason: In the interests of highway safety.

SHC 24 (Variation)

Prior to the first occupation of the development hereby permitted the proposed accesses / on-site car parking / turning shall be laid out in accordance with the approved plan and retained thereafter available for that specific use.

Reason: To ensure the permanent availability of the parking / manoeuvring area, in the interests of highway safety.

SHC 29A (Variation)

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Prior to the commencement of any works on site a Construction Traffic Management Plan, to incorporate details of on-site parking for construction workers, access arrangements for delivery vehicles and temporary wheel washing facilities for the duration of the construction period shall be submitted to and approved in writing with the Local Planning Authority in consultation with Norfolk County Council Highway Authority.

Reason:

In the interests of maintaining highway efficiency and safety

SHC 29B (Variation)

For the duration of the construction period all traffic associated with the construction of the development will comply with the Construction Traffic Management Plan and unless otherwise approved in writing with the Local Planning Authority in consultation with the Highway Authority.

Reason: In the interests of maintaining highway efficiency and safety

SHC 39A (Variation)

Notwithstanding the details indicated on the submitted drawings no works shall commence on site unless otherwise agreed in writing until a detailed scheme for the off-site highway improvement works as indicated on drawing number TL-3489-15-3-A have been submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority.

Reason: To ensure that the highway improvement works are designed to an appropriate standard in the interest of highway safety and to protect the environment of the local highway corridor.

SHC 39B (Variation)

Prior to the first occupation of the development hereby permitted the off-site highway improvement works referred to in Part A of this condition shall be completed to the written satisfaction of the Local Planning Authority in consultation with the Highway Authority.

Reason: To ensure that the highway network is adequate to cater for the development proposed.

SHC 50 (Variation)

Prior to the first occupation of the development hereby permitted all vehicular accesses shall be provided and thereafter retained with suitable arrangement for surface water drainage to be intercepted and disposed of separately so that it does not discharge onto the highway carriageway. Full details of the proposed surface water drainage methods shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of works on site.

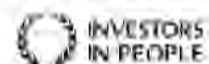
Reason: To ensure satisfactory access into the site and avoid carriage of extraneous material or surface water from or onto the highway.

Inf.1

It is an OFFENCE to carry out any works within the Public Highway, which includes a Public Right of Way, without the permission of the Highway Authority. This development involves work to the public highway that can only be undertaken within the scope of a Legal Agreement between the Applicant and the County Council. Please note that it is the Applicant's responsibility to ensure that, in addition to planning permission, any necessary Agreements under the Highways Act 1980 are also obtained. Advice on this matter can be obtained from the Kay Gordon 01362 656211 of the County Council's Highways Development Management Group .

Yours sincerely

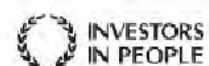
www.norfolk.gov.uk



Katy Gordon

Highways Development Management Officer
for Executive Director for Community and Environmental Services

www.norfolk.gov.uk



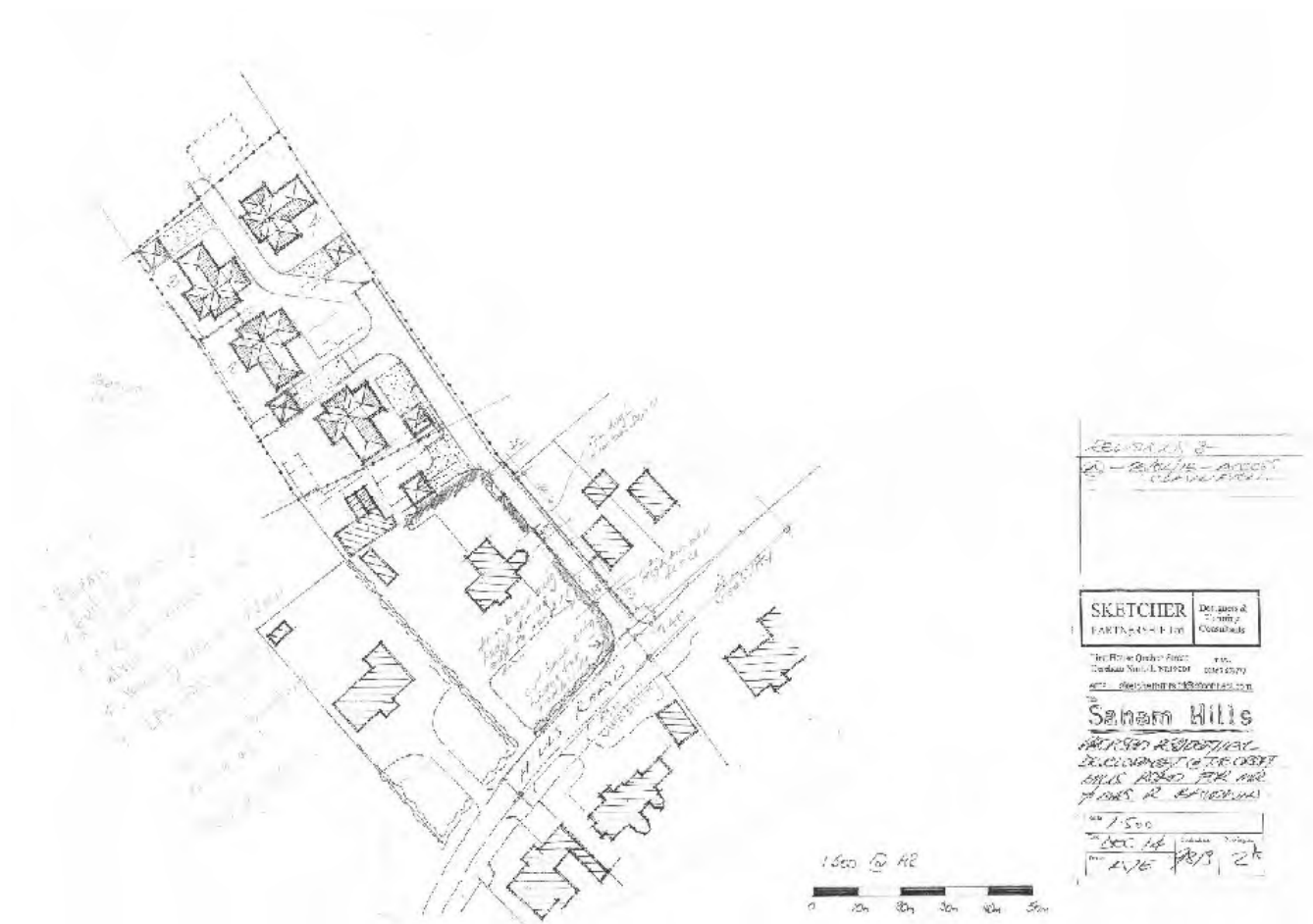


Fig. B3: STNP2 Highway Access Upgrade Proposal

Heather Byrne
Breckland Council
Elizabeth House
Walpole Loke
Dereham
Norfolk
NR19 1EE

NCC contact number: 0344 800 8020
Textphone: 0344 800 8011

Your Ref: 3PL/2015/0009/F
Date: 9 March 2015

My Ref: 9/3/15/0009
Tel No.: 01362 656211
Email: kay.gordon@norfolk.gov.uk

Dear Ms Byrne

**Saham Toney: Residential development- Erection of 4 bungalows and double
garages
SAHAM TONEY The Croft 69 Hills Road Saham Hills IP25 7EW**

Thank you for re-consulting me in respect of the above application.

The details indicated on the revised drawing 9813/2A overcome my concerns and I would therefore raise no objections subject to the following conditions being imposed
.SHC 10

Prior to first occupation hereby permitted the vehicular access shall be widened to a minimum width of 4.5metres in accordance with the Norfolk County Council residential access construction specification for the first 10 metres as measured back from the near channel edge of the adjacent carriageway. Arrangements shall be made for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway carriageway.

Reason:In the interest of highway safety and traffic movement.

SHC 24

Prior to the first occupation of the development hereby permitted the proposed access parking and turning area shall be laid out, demarcated, levelled, surfaced and drained in accordance with the approved plan and retained thereafter available for that specific use.

Reason:To ensure the permanent availability of the parking / manoeuvring area, in the interests of highway safety.

SHC 19

Prior to the first occupation of the development hereby permitted a visibility splay shall be provided in full accordance with the details indicated on the approved plan. The splay shall thereafter be maintained at all times free from any obstruction exceeding 0.6metres above the level of the adjacent highway carriageway.

Reason: In the interests of highway safety.

Inf. 2

This development involves works within the public highway that can only be carried out by Norfolk County Council as Highway Authority unless otherwise agreed in writing.

It is an OFFENCE to carry out any works within the Public Highway, which includes a Public Right of Way, without the permission of the Highway Authority. Please note that it is the Applicants' responsibility to ensure that, in addition to planning permission, any necessary consents or approvals under the Highways Act 1980 and the New Roads and Street Works Act 1991 are also obtained from the County Council. Advice on this matter can be obtained from the County Council's Highway Development Management Group. Please contact Kay Gordon 01362 656211.

Yours sincerely

Kay Gordon

Highways Development Management Officer
for Executive Director for Community and Environmental Services

www.norfolk.gov.uk





MR·A
Martin Raper Architect

3 houses at Ovington Rd, Saham Toney ~ for Blubird Planning ~ Drg No 1712 - SK1

Martin Raper, MRA 03/10/2017 1: PM 1712 Saham Toney SK1

Fig. B5: STNP9 Highway and pedestrian access proposal

From: Jacklin, Adrian [adrian.jacklin@norfolk.gov.uk]
Sent: 26 September 2014 13:31
To: jamie
Cc: Gordon, Kay
Subject: RE: Land at Ovington Road, Saham Toney

Jamie

As Kay advised we have discussed this proposal at our Developer Services meeting yesterday. The main concern lies with the lack of footways within the village for residents to access facilities.

The outcome was that we are happy for the development of the area of land that is within the development boundary (2-3 properties) subject to a footway being provided along the site frontage.

If further development is required on the land to the rear of the current boundary, we would be prepared to accept this, subject to a footway being provided to link the site to the existing section of footway adjacent to Mill View.

Hope this helps.
Regards
Adrian

Fig. B6: Email from Local Highway Authority confirming footpath requirement for STNP9

Appendix B4: STNP 12 Highway access constraint

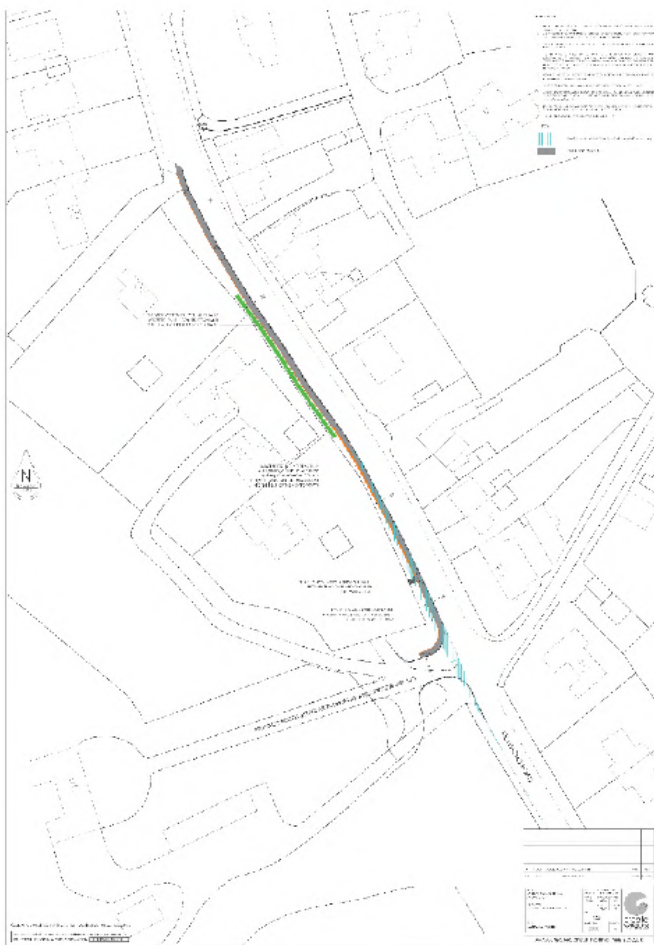


Fig. B7: STNP12: New footpath provision

Natalie Levett
Breckland Council
Elizabeth House
Walpole Loke
Dereham
Norfolk
NR19 1EE

NCC contact number: 0344 800 8020
Text Relay - 18001 0344 800 8020

Your Ref: 3PL/2018/0563/O
Date: 17 September 2018

My Ref: 9/3/18/0563
Tel No.: 01362 656211
Email: kay.gordon@norfolk.gov.uk

Dear Ms Levett

**Saham Toney: Five detached dwellings with gardens and garages
Richmond Hall Richmond Road Saham Toney IP25 7EX**

Further to my initial response of 12 June, the applicant has researched the highway boundary and has demonstrated that it is possible to provide a new footway from the site to the existing provision in Richmond Road as indicated on Drawing 1534/03/001 Rev A.

I would reiterate the advice provided in respect of the previous application in that that whilst a footway running northwards from the site to the existing provision in Richmond Road appears deliverable, this will involve re levelling existing banks and cutting back vegetation. It will also introduce kerbing where currently surface water can soak into the adjacent verge and the effect of the scheme on surface water drainage will need to be addressed when the formal details are submitted for approval.

The application is submitted in Outline with all matters reserved but, since indicative details of the footway have been submitted, I would recommend that the following conditions and informative note are imposed at this stage with details of access, parking and turning forming part of the reserved matters application.

SHC 32A

Notwithstanding the details indicated on the submitted drawings no works above slab level shall commence on site unless otherwise agreed in writing until detailed drawings for the off-site highway improvement works as indicated on Drawing No.1534/03/001 Rev A have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the highway improvement works are designed to an appropriate standard in the interest of highway safety and to protect the environment of the local highway corridor.

SHC 32B

Prior to the first occupation of the development hereby permitted the off-site highway improvement works referred to in Part A of this condition shall be completed to the written satisfaction of the Local Planning Authority.

Reason: To ensure that the highway network is adequate to cater for the development proposed.

Inf. 1

It is an OFFENCE to carry out any works within the Public Highway, which includes a Public Right of Way, without the permission of the Highway Authority. This development involves work to the public highway that can only be undertaken within the scope of a Legal Agreement between the Applicant and the County Council. Please note that it is the Applicant's responsibility to ensure that, in addition to planning permission, any necessary Agreements under the Highways Act 1980 are also obtained and typically this can take between 3 and 4 months. Advice on this matter can be obtained from the County Council's Highways Development Management Group based at County Hall in Norwich. Please contact Kay Gordon 01362 656211. Public Utility apparatus may be affected by this proposal. Contact the appropriate utility service to reach agreement on any necessary alterations, which have to be carried out at the expense of the developer. If required, street furniture will need to be repositioned at the Applicants own expense.

Yours sincerely



Highways Development Management Officer
for Executive Director for Community and Environmental Services

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Community and Environmental
Services
County Hall
Martineau Lane
Norwich
NR1 2SG

NCC contact number: 0344 800 8020
Textphone: 0344 800 8011

Heather Byrne
Breckland Council
Elizabeth House
Walpole Loke
Dereham
Norfolk
NR19 1EE

Your Ref: 3PL/2015/0009/F
Date: 5 February 2015

My Ref: 9/3/15/0009
Tel No: 01362 656211
Email: kay.gordon@norfolk.gov.uk

Dear Ms Byrne

Saham Toney: Residential development- Erection of 4 bungalows and double garages
SAHAM TONEY The Croft 69 Hills Road Saham Hills IP25 7EW

Thank you for consulting me in respect the above application

My advice is based on the fact that the site has an extant use as a pig rearing unit which could generate a number of daily vehicular movements including large agricultural vehicles and HGV's.

The existing access, which already serves one dwelling and possibly two, has a running width of 3.3 m and does not allow for a two way flow of vehicular traffic. Further, visibility from the point of access on Hills Road is restricted by a telegraph pole to the north and the hedge fronting The Croft to the south.

Given the potential traffic generation associated with the existing use I would find difficulty in substantiating an objection to the proposed re-development of the site into 4 dwellings provided that the access and visibility were improved.

In this instance I would wish to see the access widened to 4.5m for the first 10m into the site and for a visibility splay measuring 2.4m x 43m to be provided to the south of the access. It is noted that the applicant controls the land required for this.

Whilst the applicant does not control the land to the north of the access, given the site is already capable of generating traffic movements I consider the improvements to the width of the access and visibility in the approaching traffic direction will be acceptable in this instance to mitigate the effect of 4 dwellings.

Please would you obtain a revised drawing including the improved access and visibility and I will confirm the conditions I would wish to be imposed.

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It is noted that the applicant also controls land to the north of the site and it would be helpful to know whether this land also forms part of the pig rear unit.

Yours sincerely

Katy Gordon

Highways Development Management Officer
for Executive Director for Community and Environmental Services

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Fig. B9: Local Highway Authority response to planning application 3PL/2015/0009/F



PART TWO: REMOVAL OF SITE ALLOCATIONS AS A RESULT OF REGULATION 14 CONSULTATION ON THE NEIGHBOURHOOD PLAN; MASTERPLANNING STUDIES & A PROFESSIONAL REVIEW OF LANDSCAPE IMPACT

22.0 PRE-SUBMISSION CONSULTATION WITH REGARD TO SITE SELECTIONS

22.1 Consultation on the Regulation 14 pre-submission version of the Saham Toney Neighbourhood Plan took place from 19 August to 13th October 2019. Full details of the organisations and individuals consulted, the representations received, the responses to them and changes made to the Plan as a result, are given in the Saham Toney Neighbourhood Plan Consultation Statement.

22.2 Although it requested some amendments to policy text, Breckland Council had no comments on the number of sites allocated, nor the number of dwellings allocated for each site.

22.3 There were no comments on the site allocations by the Lead Local Authority or the Statutory Water Provider (Anglian Water), both of which organisations had carried out assessments of the 16 sites originally proposed for allocation.

22.4 Representations on the site allocations were made by the Local Highways Authority (Norfolk County Council), and are given in the Saham Toney Neighbourhood Plan Consultation Statement section B4.8, together with the responses to the comments. Following clarification of its comments, the Local Highways Authority objected to the allocation of sites STNP2, 9, 13 and 14, and requested further evidence for sites STNP6 and 15. It also commented that the overall number of dwellings allocated should not significantly exceed the housing target for Saham Toney set by the Breckland Local Plan (33 houses on sites outside but immediately adjacent to the settlement boundary). As explained in the Consultation Statement, the requested evidence for sites STNP6 and 15 was provided, but the reasons given in the Local Highways Authority's representation to exclude sites STNP2, 9, 13 and 14 from allocation were not accepted.

22.5 Norfolk County Council's Historic Environment department submitted its "traffic light" conclusions about each allocated site, and rated every allocated site "amber" with the exception of site STNP2, which it rated "green". Responses addressing concerns relating to each "amber" rated site are given in the Consultation Statement and explain why no changes to the number of sites or houses allocated were required as a result.

22.6 With one exception, villager comments on allocated sites were limited to sites STNP1, 4, 5, 6 and 7. Four comments were received about the potential cumulative impact on surface water flood risk of all 5 sites, and another on the same theme but limited to sites STNP1, 5 and 6. Five comments were received about the potential impact of sites STNP5 and 6 on the open view from Pound Hill towards Saham Mere. Two comments highlighted concern about increased traffic along Pound Hill as a result of developing the five sites. One comment about potential disturbance of archaeologically important items was received in relation to sites STNP1, 5 and 6. Additionally one comment was received regarding potential impact on road safety of site STNP15. Full details of villager comments and the responses to them are given in the Consultation Statement.

23.0 MASTERPLANNING STUDIES

23.1 The pre-submission version of the Neighbourhood Plan allocated several sites, that either individually or in combination with adjacent allocations, constituted major development. Sites STNP1, STNP4, STNP5, STNP6 and STNP7 formed a cluster in the Pound Hill / Page's Lane area comprising a total of 48 dwellings; and STNP16, in combination with an adjacent site having outline permission, was allocated for a total of 17 dwellings.

23.2 Given the size of these sites, it was decided that masterplanning studies should be carried out to provide further guidance on appropriate site layouts. Via a Locality technical support grant, AECOM were commissioned to prepare those studies.

23.3 AECOM published the completed Masterplanning Report in February 2020. For the site cluster (Sites STNP1, 4, 5, 6 and 7) on the one hand, and Site STNP16 on the other, the study presented 3 and 4 site layout options respectively. The study report was approved by Locality on 24th February 2020, and is submitted separately as part of the evidence base for the Neighbourhood Plan.

23.4 The site options presented in the published AECOM masterplanning report were then subsequently reviewed by landscape architect Lucy Batchelor-Wylam CMLI – see section 24.0 for further details of that review.

23.5 The AECOM masterplanning work, together with the further landscape review work, highlighted the extent of the combined adverse effects the proposed site allocations STNP1, 4, 5, 6 and 7 as set out in the Regulation 14 Pre-Submission Plan would have on landscape character. As a result, it was decided to remove site allocations STNP5 and STNP6 and to provide indicative site layouts for the site allocations STNP1, 4 and 7 and STNP16 in the submission Neighbourhood Plan. For convenience these are given below in Figures 20a/b and 21a/b.

23.6 The Masterplanning Report includes illustrative 3D artist's impressions of sites STNP1 and 4-7 and includes alternate options with and without the inclusion of sites STNP5 and 6, used to add context and assist in the cumulative landscape impact review of that cluster of sites. Those views are presented in Figures 22a-d.

23.7 A review of the four options studied for site STNP16, with the participation of the landowner, concluded that a change to the pre-submission site boundary resulted in a better site layout. That revised boundary, which maintains the same site area, is shown in Figure 21b.

3.5.4. Masterplanning Option 2

Option 2 reduces the number of new houses across the sites to a total of 35. This lower number can be accommodated on just Sites STNP 1, 4, and 7, leaving Sites 5 and 6 undeveloped. This option presents more advantages in terms of landscape sensitivity, open space requirements, and flood risks, but provides housing numbers that are significantly below the Neighbourhood Plan targets. The main characteristics are summarized below:

- A total of 35 new houses to be distributed according to the table opposite.
- A total of 0.86 ha of new open space to be distributed across the sites due to the inclusion of green areas for flood risk attenuation measures and the requirement to retain a Key View.
- Creation of a green space on Site STNP 1 with an area for flood risk attenuation.
- Site STNP 5 and 6 to remain undeveloped.
- Building line pulled away from Page's Place and Pound Hill to plain views towards the church tower and the hatched setting of Page's Place.
- Additional flood attenuation measures to be provided for residential areas on Sites 4 and 7 located in at low surface water flood risk areas.
- Retention of most existing trees and hedges; any loss to be offset by the planting of new vegetation. New low-level planting added in places where open views are to be retained.

Site #	STNP 1	STNP 4	STNP 5	STNP 6	STNP 7
# Houses	10	17	0	0	8



Fig. 20a: Masterplanning for Sites STNP1, 4, 5, 6 and 7 – Description and Key

-  Proposed garages
- Proposed 1 storey houses:
 -  1 bedroom
 -  2 bedrooms
 -  3 bedrooms
- Proposed 2 storey houses:
 -  2 bedrooms
 -  3 bedrooms
 -  4+ bedrooms
- A** Affordable housing units
- A** Area for flood risk attenuation measures



Figure 27: Sites STNP 1, 4, 5, 6, and 7 Option 2 masterplan (© Crown copyright and database rights 2019 Ordnance Survey 0100031573). Inset map: Policy Map 7B: Key views (© Saham Toney Parish Council).

Fig. 20b: Masterplanning for Sites STNP1, 4, 5, 6 and 7 – Plan

3.3.5. Masterplanning Option 4 (Preferred Option)

- Site STNP 16 boundaries amended; total area (combined with outline permits on site) decreased to 1.05 ha (net loss of 0.08 ha compared to Options 1-3).
- Extension of amenity land to be amended to reflect modified boundaries for Site STNP 16 (net gain of 0.08 ha compared to Options 1-3).
- 11 new houses proposed on Site STNP 16; 6 new houses proposed on outline permits on site.
- Site STNP 16 buildings to adopt a linear pattern to decrease impact of development on landscape.

Retention of most existing trees and hedges; any loss to be offset by the planting of new vegetation.



Fig. 21a: Masterplanning for Site STNP16 – Description and Key



Figure 22: Site STNP 16 and outline permission site Option 4 masterplan (© Crown copyright and database rights 2019 Ordnance Survey 0100031673).

Fig. 21b: Masterplanning for Site STNP16 – Plan



Fig. 22a: Illustrative view of sites STNP4-7 looking south



Fig. 22b: Illustrative view of sites STNP4 and STNP7 looking south (STNP5 and 6 removed)



Fig. 22c: Illustrative view of sites STNP1 and STNP4-7 looking west from Chequers Lane



Fig. 22d: Illustrative view of sites STNP1, STNP4 and STNP7 looking west from Chequers Lane (STNP5 and 6 removed)

24.0 PROFESSIONAL REVIEW OF THE LANDSCAPE IMPACT OF MAJOR DEVELOPMENTS

24.1 During development of the masterplanning studies for sites STNP1, 4, 5, 6 and 7 (as a combined settlement cluster) and STNP16, in conjunction with AECOM, it was determined that the study options should be professionally reviewed with regard to their landscape and visual impact. The reasons for doing this were:

- a) The size of the sites;
- b) Objections to some of the sites (most notably STNP5), on landscape grounds, made by villagers during the Regulation 14 pre-submission consultation of the Plan;
- c) Given that a combined landscape impact review of sites STNP4, STNP5 and STNP6, prepared by the Neighbourhood Plan Work Group as part of this Site Selection Report (see Part 1, sections 13 and 15), concluded the base case option (as allocated in the pre-submission Plan) for those sites was only borderline acceptable, while an increased capacity case proposed by the landowners (option 1 of the masterplanning studies for those sites) was unacceptable, it was decided a professional opinion was needed to more definitively consider landscape impact;
- d) An option limiting development of sites STNP4, STNP5, STNP6 and STNP7 to a total of 25 dwellings was studied to address an initial consultation representation by the Local Highways Authority with respect to those sites. That case had not previously been subject to a landscape and visual impact review, but because of known landscape concerns was studied on the basis of only sites STNP4 and STNP7 being developed.

24.2 Lucy Batchelor-Wylam CMLI was commissioned to undertake the review. Lucy had earlier prepared the Saham Toney Parish Landscape Character Assessment, January 2019 and so had a thorough understanding of the potential issues involved. Her review is given in full as an appendix to the AECOM masterplanning study report. Its findings are summarised as follows:

- a) For sites STNP1, 4, 5, 6 and 7, review of the three study options leads to a conclusion that **Option 2²² is the only option that the landscape sensitivity assessment work²³ would support.** The other two options²⁴ will have substantial negative impacts.
- b) Development of site STNP16 on the scale proposed in the pre-submission plan is supported, with a preference for layout option 4.

24.2 With respect to the pre-submission matrix-based landscape impact assessment given in section 13 of this report, the review's findings were as follows:

- a) The landscape impact assessment in the Site Selection Report starts well and picks out salient parts from the Parish Landscape Character Assessment. The findings up to paragraph 13.13 are broadly acceptable.
- b) The series of matrices used are overly complicated and the assessment falls into the trap of relying on the outputs of those matrices, rather than really thinking about the particular characteristics, function and sensitivities of this area. When using such matrices, changing one variable in any one matrix can often significantly affect final conclusions.

²² STNP1: 10 dwellings; STNP4: 17 dwellings; STNP7: 8 dwellings (STNP5 and 6: no development)

²³ Saham Toney Parish Landscape Character Assessment, Lucy Batchelor-Wylam, January 2019

²⁴ Base case: as allocated in the pre-submission Plan; option 1: a total of 72 houses on the five sites

- c) Instead of a matrix approach, attention should focus on the key characteristics, including:
 - What makes this area distinctive / identifiable?
 - Would these characteristics be lost or enhanced by development?
 - What sort of development pattern would be most appropriate?
- d) The key landscape characteristic of this area is its openness, the way it allows long views between different part of the village, its rural character and the way it functions as a gap in and separation of the landscape. If that gap is filled with development, regardless of it possibly being low rise; or low density; or bungalows: the character of the area will change.
- e) Considering those factors, it is not clear that loss of the area's key characteristics would be 'mitigatable', and certainly there is not scope for GOOD mitigation. Although the landscape is mostly flat and there is opportunity and space for screening, such as tree and hedge planting etc.; screening is not necessarily the same as 'good' mitigation. Development plus screening would cause a notable change to the character of the area: i.e. by a loss of openness and merging of the existing separate settlement clusters.
- f) The magnitude of change of the base case option would not be 'LOW' as stated in paragraph 13.19 of the assessment. Even though dwelling heights and density would be low, the land use would be domestic, the village edge would become continuous, the planting would be ornamental rather than natural, and the driveways and the cars would be visible. In summary, regardless of height / density, the character of the area would change to become a much more urbanised scene.
- g) Bungalows have been suggested on site STNP6, presumably to minimise impact, but in practice, bungalows are often best tucked away rather than put in the most prominent site, since it is not always easy to provide good-looking bungalow forms. The character of the area, on Chequers Lane for example, is more cottage scale, and dwellings of a storey and a half would seem more appropriate. Also, the layout of the cul-de-sac here does not reflect the character of the existing settlement pattern, which is generally cottages fronting on to the highway.
- h) As a result, it cannot be said that the sites in combination, or individually in the case of STNP5 and STNP6 have moderate capacity to absorb development without change to the character of the area.
- i) In summary, to reiterate, *if other constraints allow*, it would be better to provide more houses in denser arrangements that use less land (i.e. allocate fewer of the five sites). This will help achieve similar housing numbers but at the same time maintain the character of the Pound Hill / Pages Lane area.

25.0 UPDATED MATRIX ASSESSEMENT OF THE CUMULATIVE LANDSCAPE IMPACT OF SITES STNP4, 5 and 6

25.1 The professional review of landscape impact and interpretation of that with respect to the Saham Toney Parish Landscape Character Assessment, as summarised in section 24, carries the greatest weight, and is in itself sufficient justification to exclude sites STNP5 and 6 from allocation in the Neighbourhood Plan. However, for completeness, the matrix-based assessment of sites STNP4, 5 and 6 is updated below, taking into account the findings of the professional review. It serves as confirmation that a matrix-based assessment applied using professional interpretation of the various criteria supports the conclusion that the impact of sites STNP5 and 6 is unacceptable. The information given in sections 13.1 to 13.8 does not require amendment and so is not repeated in this update.

25.2 Figure 23 is an update to Figure 13, to better represent the key landscape elements of the area in question.

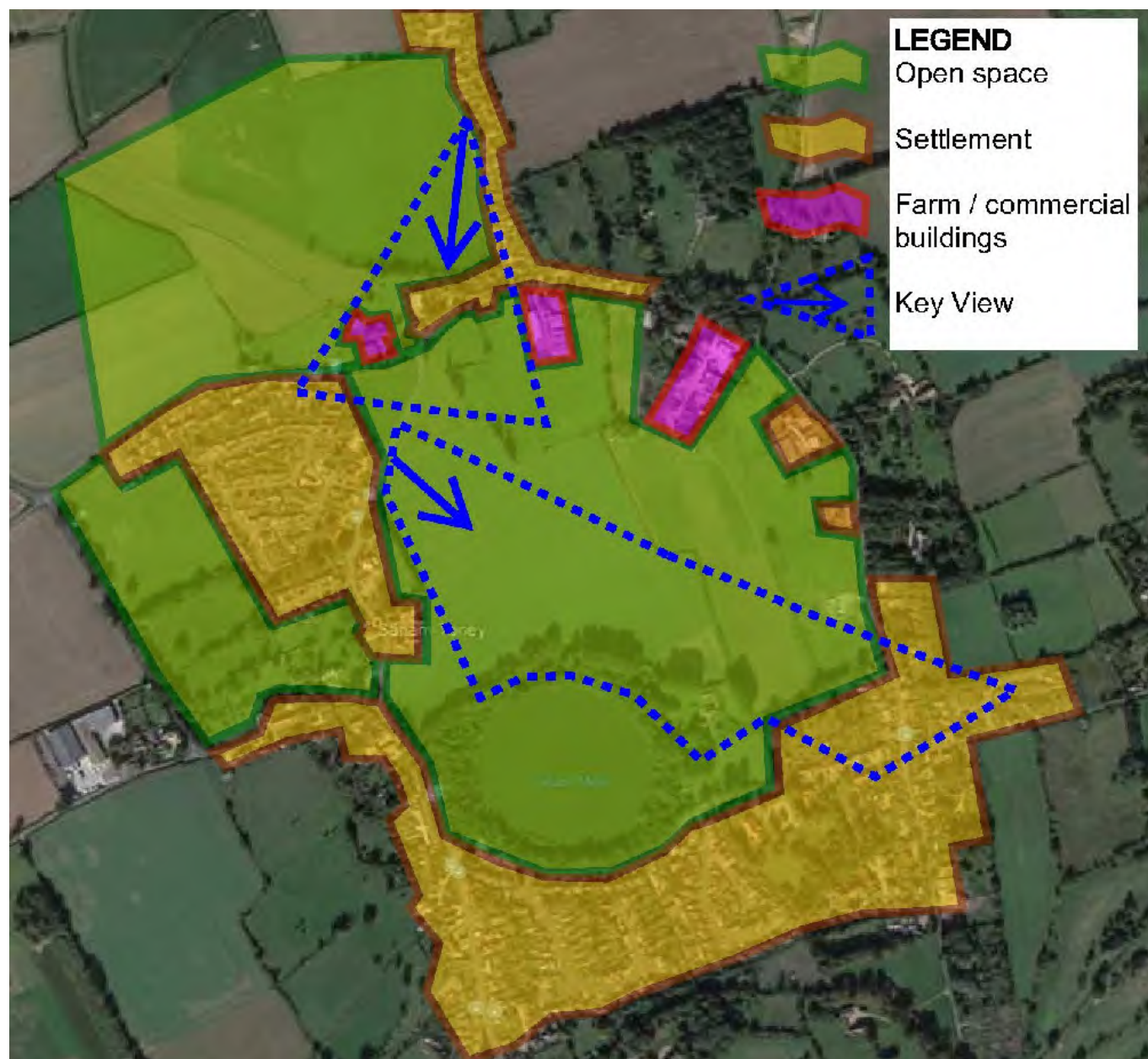


Fig. 23: Open Spaces and Key Views

25.3 The combined landscape sensitivity of STNP456 at site level remains **moderate-high** (reference section 13, Tables 48-50).

25.4 In order to form an overall sensitivity judgement account must be taken of scope for mitigation of landscape impact. Scope for mitigation is considered to fall into one of the following three categories:

- g) Good: Mitigation of adverse effects is feasible and is likely to be sympathetic in character;
- h) Moderate: There is some scope for effective mitigation measures that would not be wholly discordant with landscape character; or
- i) Limited: Prevailing conditions mean mitigation would be difficult and/or likely to be discordant with landscape character.

25.5 The professional review of the original matrix landscape impact assessment highlighted that there is not scope for 'good' mitigation of landscape impact (see 24.2 (e)). Although its combined size is relatively small scale and of low density, and there is opportunity and space for screening, development of sites STNP4, 5 and 6, even with screening, would cause a notable change to landscape character due to loss of openness and merging of separate settlement clusters. It is therefore judged to have only moderate scope for mitigation.

25.6 Overall landscape sensitivity is derived from the relationship between combined sensitivity and scope for mitigation, as set out in Table 72. On this basis it is concluded **that site STNP456 has moderate to high overall landscape sensitivity.**

Scope for mitigation	Limited	LOW-MODERATE	MODERATE	MODERATE-HIGH	HIGH	HIGH
	Moderate	LOW	LOW TO MODERATE	MODERATE	MODERATE TO HIGH	HIGH
	Good	LOW	LOW	LOW-MODERATE	MODERATE	MODERATE TO HIGH
TABLE 72: OVERALL LANDSCAPE SENSITIVITIES		Low	Low to Moderate	Moderate	Moderate to High	High
		Combined Landscape Sensitivity (Table 48)				

25.7 The landscape capacity of the site to accept development is established by considering its overall sensitivity in combination with its landscape value. Capacity is then established as set out in Table 73.

Overall Landscape Sensitivity (Table 72)	High	MODERATE	LOW-MODERATE	LOW-MODERATE	LOW	LOW
	Moderate to High	MODERATE TO HIGH	MODERATE	LOW-MODERATE	LOW-MODERATE	LOW
	Moderate	MODERATE TO HIGH	MODERATE TO HIGH	MODERATE	LOW-MODERATE	LOW-MODERATE
	Low to Moderate	HIGH	MODERATE TO HIGH	MODERATE TO HIGH	MODERATE	LOW-MODERATE
	Low	HIGH	HIGH	MODERATE TO HIGH	MODERATE TO HIGH	MODERATE
TABLE 73: LANDSCAPE CAPACITY		Low	Low to Moderate	Moderate	Moderate to High	High
		Landscape Value (Table 74, 25.8)				

25.8 Landscape value may be defined as "the relative value that is attached to different landscapes by society". Individual elements of a landscape, such as trees, buildings, hedgerows or historic features, may also have value, particularly when assessed at site level. Landscape value is judged against the criteria given in Table 74. From the assessment of each criterion it is concluded that sites STNP4, 5 and 6 in combination have moderate to high landscape value.

Criterion	STNP456 Landscape value
Landscape quality, condition and distinctiveness: the extent to which typical character is represented in individual areas, the intactness of the landscape from visual, functional and ecological perspectives and the condition of individual elements of the landscape.	MODERATE: Largely intact landscape in moderate condition
Scenic quality: depends upon perception and reflects the particular combination and pattern of elements in the landscape, its aesthetic qualities, its more intangible sense of place or 'genius loci' and other more intangible qualities.	MODERATE: The site is part of a wider area that evokes a strong sense of place, but in itself is not as scenic as the whole
Rarity: A landscape may be valued because it is a rare type, or because it contains rare elements, features or attributes.	LOW: A common landscape in the Neighbourhood Area
Representativeness: A landscape may be valued because it is considered to be a particularly good example of its type either in terms of its overall character or because of the elements or features it contains.	MODERATE: A fairly typical landscape elevated in value by its setting and context
Conservation interests: The presence of features of wildlife, earth science or archaeological or historical and cultural interest can add to the value of the landscape as well as having value in their own right.	HIGH: Historical interest as part of the area first developed in the village, with potential for important archaeological finds
Perceptual aspects: A landscape may be valued for its perceptual qualities, notably wildness and/or tranquillity	HIGH: Forms part of the important gap between settlement clusters and part of the setting for key and valued views
Consensus: There may be a consensus of opinion, expressed by the public, informed professionals, interest groups, and artists, writers and other media, on the importance of the landscape.	HIGH: Valued by villagers as an evocative gateway to the historic core of the village. Professionally identified as important by the Parish Landscape Character Assessment 2019

Table 74: STNP456 Landscape Value Assessment

25.9 Sites STNP4, 5 and 6 in combination have been shown to have moderate to high overall landscape sensitivity (Table 72) and moderate to high landscape value (Table 74). By reference to Table 73 they therefore have **low to moderate landscape capacity**.

25.10 Magnitude of change is judged against the criteria listed in Table 75.

Magnitude of change	Criteria
High	Where the development would appear as a significant new component in the landscape and result in a significant change in the existing balance of components, or cause a total loss or major alteration to the elements comprising the baseline conditions
Moderate	Where the development would appear as a distinctly noticeable new component in the landscape and result in a readily perceived change in the existing balance of components, or cause a partial loss or alteration to the elements comprising the baseline conditions
Low	Where the development would appear as a noticeable new component in the landscape and result in a discernible change in the existing balance of components, or cause a minor loss or alteration to the elements comprising the baseline conditions
Negligible / no change	Where the development would appear as a new component in the landscape, resulting in a barely perceptible change in the existing balance of components, or where the development would not appear uncharacteristic to the existing baseline conditions

Table 75: Criteria to Establish Magnitude of Change

25.11 Sites STNP4, 5 and 6 form part of a tract of land along Page's Lane and Pound Hill that may effectively be considered a gateway between Saham Toney and Saham Hills. They are on the periphery of a larger tract of land between Pound Hill and Saham Mere that gives the area its character and sense of place (see Figures 13 and 14). The proposed development of the three sites (as allocated in the pre-submission Neighbourhood Plan) is for a total of 30 dwellings of one, one and a half and two storeys. Although there is some opportunity for landscaping designed to maintain an open feel and screen development, as shown by the masterplanning base case study, the land use would be domestic, the village edge would become continuous, the planting would likely be ornamental, the driveways and the cars would be visible. Hence regardless of dwelling height or density, development of the combined site would change the character of the area to a much more urbanised scene. On this basis it is concluded that the magnitude of change resulting from development of the site would be "moderate", as described in Table 75.

25.12 Taking account of the overall landscape sensitivity of sites STNP4, 5 and 6 given in Table 72, in combination with the likely magnitude of change, as set out in table 75, the impact significance of developing the site would be **moderate to high**, as shown in Table 76.

Magnitude of Change (Table 75)	High	LOW-MODERATE	MODERATE	MODERATE-HIGH	HIGH	HIGH
	Moderate	LOW	LOW TO MODERATE	MODERATE	MODERATE TO HIGH	HIGH
	Low	NEUTRAL	LOW	LOW-MODERATE	MODERATE	MODERATE TO HIGH
	Negligible	NEUTRAL	NEUTRAL	LOW	LOW-MODERATE	MODERATE
TABLE 76: IMPACT SIGNIFICANCE		Low	Low to Moderate	Moderate	Moderate to High	High
		Overall Landscape Sensitivity (Table 72)				

25.13 The various categories of impact significance ratings are as given in Table 77, with the description of moderate to high impact significance highlighted.

Rating	Effects
High	The proposals are at complete variance with the landform, scale and pattern of the landscape. ❖ They are highly visual and extremely intrusive, destroying fine and valued views both into and across the area; ❖ They would irrevocably damage or degrade, badly diminish or even destroy the integrity of characteristic features and elements and their setting; ❖ They would cause a very high quality or highly vulnerable landscape to be irrevocably changed and its quality very considerably diminished; ❖ They could not be mitigated for, i.e. there are no measures that would protect or replace the loss of the landscape.
Moderate-high	The proposals are at considerable variance with the landform, scale and pattern of the landscape. ❖ They are visually intrusive and would disrupt fine and valued views of the area; ❖ They are likely to degrade, diminish or even destroy the integrity of a range of characteristic features and elements of their setting; ❖ They would be substantially damaging to a high quality or highly vulnerable landscape, resulting in fundamental change and be considerably diminished in quality; ❖ They cannot be adequately mitigated for.
Moderate	The proposals are out of scale with the landscape, or at odds with the local pattern and landform. ❖ They are not possible to fully mitigate for, that is, mitigation will not prevent the scheme from scarring the landscape in the longer term as some features of interest will be partly destroyed or their setting reduced or removed; ❖ They will have an adverse impact on a landscape of recognised quality or on vulnerable and important characteristic features or elements; ❖ They are in conflict with local and national policies to protect open land and nationally recognised countryside and historic environment.
Low-moderate	The proposals do not quite fit the landform and scale of the landscape.

	❖ Although not very visually intrusive, they will impact on certain views into and across the area; ❖ They cannot be completely mitigated for because of the nature of the proposal itself or the character of the landscape through which it passes; ❖ They may affect an area of recognised landscape quality; ❖ They do not conflict with policies for protecting the local character of the countryside.
Low	The proposals are well designed to complement the scale, landform and pattern of the landscape. ❖ They incorporate measures for mitigation to ensure that the scheme will blend in well with surrounding landscape features and landscape elements; ❖ They avoid neither being visually intrusive nor have an adverse effect on the current level of tranquillity of the landscape through which the route passes; ❖ They maintain existing landscape character in an area which is not a designated landscape, that is, neither national nor local high quality, nor is it vulnerable to change; ❖ They avoid conflict with government policy towards protection of the countryside.
Neutral	No impact

Table 77: Impact Significance Descriptions

25.14 It can be concluded from the description in Table 77 that site STNP456's moderate to high impact significance **would be unacceptable**, and that available, practical mitigation measures could not adequately compensate for the impact.

25.15 Interpreting the updated matrix assessment in conjunction with the professional review of landscape impact given in section 24, leads to the conclusion that of the three sites, it is STNP5 and 6 that have the greatest detrimental impact on landscape.

26.0 OTHER LANDSCAPE IMPACT FACTORS

26.1 Although by themselves not sufficiently conclusive to determine landscape impact, the following factors, when considered in conjunction with the professional review of impact and the updated matrix-based assessment, add weight to their findings:

- a) Villager representations made during the Regulation 14 pre-submission consultation on the Neighbourhood Plan (see the Consultation Statement for full details). These highlighted a wish to retain the open nature of farmland bordered by Pound Hill, Page's Lane and Chequers Lane, and the open views across that land, particularly towards Saham Mere.
- b) Refusal of planning application 3PL/2016/1017/O and the subsequent planning appeal decision ref. APP/F2605/W/17/3176509, dated 3rd November 2017. This related to the proposed development of 19 houses to the east of Pound Hill, immediately to the south of site STNP5. The site plan proposed is given below in Figure 24. A key reason for refusal of the planning application as stated in the Local Planning Authority's decision notice was "The proposed development would result in the intrusion of built development into the open countryside, detracting from the character, appearance and openness of the site and surrounding rural area. The proposals would not form sustainable development, and the benefits of the proposed

development would not outweigh the harm caused.” The planning appeal decision noted that the main issue was “the effect of the proposed development on the character and appearance of the area”. The Planning Inspector concluded “The environmental harm that would be caused by virtue of the scale, location and nature of the proposed development would be substantial”, going on to say that harm would significantly and demonstrably outweigh the modest benefits of the proposal. Both decisions were made in the light of and notwithstanding a professional landscape and visual impact assessment of the site submitted by the applicant.



Fig. 24: Earlier Refused Site Immediately to the South of Site STNP5

27.0 SITE SELECTION ACTIONS AS A RESULT OF LANDSCAPE IMPACT REASSESSMENT

27.1 As a result of the professional review of landscape impact and the updated matrix assessment, it was concluded that development of sites STNP4, 5 and 6 for a total of 30 dwellings would have an unacceptable impact significance that could not be adequately mitigated.

As a result, the following actions were taken regarding site allocation:

27.1.1 Site STNP5 was removed from allocation in the Neighbourhood Plan due to its unacceptable impact on landscape character and protected and open views.

27.1.2 Site STNP6 was removed from allocation in the Neighbourhood Plan due to its unacceptable impact on landscape character and protected and open views.

27.1.3 The allocation for site STNP4 was increased from 13 to 17 dwellings.

28.0 UPDATED SITE RATINGS AND RANKINGS

28.1 To reflect changes made as a result of the various studies, reviews and reassessments made subsequent to the pre-submission consultation, as described in sections 22 to 27, the site selection ratings and rankings have been updated, as shown in Tables 78 and 79.

	No of Houses Proposed	Site area (ha)	Site density (dph)	Distance to a bus stop	Distance to services / facilities	Housing mix vs Needs Assessment	Maintain amenity	Heritage asset setting	Density	Highway access - visibility	Highway access - width & footpaths	Scale & location vs character area & sensitivity	Impact on landscape character	Preserve / incorporate key views	No undesirable loss of biodiversity	Flood risk - sequential test	Appropriate surface water drainage mitigation measures	Loss of undeveloped land	Loss of agricultural land	Improve quality / quantity of open space
POLICY				1		2D	3A		3B	3C		7A		7B	7D	8	ENV09	OBJECTIVE		
CRITERIA				1a	1b	1	1	2	1	1a	1b	1a	1b	1	1	1	2	1a	1b	13
WEIGHT				3	3	4	2	2	2	5	5	4	4	4	2	5	3	1	1	2
SITE ID ↓	Max possible score			3	3	2	2	2	2	3	4	2	4	2	2	2	4	4	2	2
STNP1	10	1,06	9,4	1	-1	2	1	0	2	2	3	1	2	1	-1	1	3	2	1	0
STNP2	4	0,3	13,3	-1	-1	2	0	0	0	2	2	2	4	0	-1	2	4	3	1	0
STNP4	17	0,813	20,9	3	-1	2	0	-1	-1	1	4	-1	1	0	-1	1	3	0	1	1
STNP7	8	0,54	14,8	3	-1	-1	0	-1	0	2	3	1	2	0	-1	1	2	1	-1	0
STNP9	3	0,445	6,7	-1	0	-1	0	-1	2	3	3	0	3	0	-1	-1	3	0	1	0
STNP13	5	0,2	25,0	-1	-1	0	-1	0	-1	1	1	0	3	0	-1	2	4	0	2	0
STNP14	5	0,3	16,7	-1	-1	0	0	0	0	1	1	0	3	0	0	2	4	0	-1	0
STNP15	6	0,4	15,0	3	-1	0	0	-1	1	1	4	0	1	0	-1	1	3	1	2	0
STNP16	12	0,65	18,5	1	1	0	-1	0	0	2	3	-1	3	0	-1	2	4	1	2	2

Table 78: Updated Site Selection Criteria Ratings

WEIGHTED RESULTS TABLE			RANKED RATINGS				CUMULATIVE HOUSES
SITE ID	SCORE	HOUSES	RANK	SITE ID	SCORE	HOUSES	
STNP1	70	10	1	STNP1	70	10	10
STNP2	70	4	1	STNP2	70	4	14
STNP4	50	17	3	STNP16	64	12	26
STNP7	46	8	4	STNP4	50	17	43
STNP9	40	3	5	STNP15	50	6	49
STNP13	34	5	6	STNP7	46	8	57
STNP14	37	5	7	STNP9	40	3	60
STNP15	50	6	8	STNP14	37	5	65
STNP16	64	12	9	STNP13	34	5	70
Max possible score = 104							

Table 79: Updated Overall Site Selection Ratings and Rankings

28.2 Tables 78 and 79 include only those sites allocated in the Regulation 15 submission version of the Plan. By comparison with the pre-submission ratings given in Table 66, the changes (red text) are:

Site STNP2 – density rating reduced from 2 to 0, to reflect amendment of the site area following remeasurement I (in response to a consultation comment);

Site STNP4 – density rating reduced from 2 to -1 due to an increase in site capacity from 13 to 17 houses, and open space improvement rating increased from 0 to 1 to reflect masterplanning studies;

Site STNP5 – no longer included due to its removal from allocation on grounds of unacceptable landscape impact;

Site STNP6 – no longer included due to its removal from allocation on grounds of unacceptable landscape impact;

Site STNP7 – rating for impact on landscape character reduced from 4 to 2 to reflect landscape consultant's review of masterplanning studies, and rating for loss of undeveloped land reduced from 3 to 1 to reflect masterplanning studies;

Site STNP16 – density rating decreased from 2 to 0: correction to reflect earlier reduction in site capacity, and rating for impact on landscape character increased from 1 to 3 to reflect landscape consultant's review of masterplanning studies.



PART THREE: ASSESSMENTS TO VERIFY THE PLAN

29.0 STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

29.1 In parallel with the Regulation 14 pre-submission consultation on the Neighbourhood Plan, in September 2019 Breckland Council commissioned Norfolk County Council to perform a SEA screening of the Plan. That screening concluded that it was necessary for the Plan to undergo a Strategic Environmental Assessment. That assessment was carried out by AECOM. The results of its assessment of reasonable alternatives (five options with varying numbers of allocated sites and total new dwellings) supported the decision to allocate a total of nine sites expected to deliver a maximum of 70 new dwellings. That option was then subjected to a full assessment in the context of the Neighbourhood Plan's draft Regulation 15 submission policies.

29.2 The conclusions of the SEA were that, based on its policies, the Saham Toney Neighbourhood Development Plan:

- a) Is likely to lead to significant long-term positive effects in relation to the 'Population and Community' and 'Health and Wellbeing' SEA themes. These benefits largely relate to the Neighbourhood Plan's focus on providing new housing to meet local needs, the provision of new open spaces and enhancement of green infrastructure networks in the area, support for new community provision, and the protection and enhancement of the quality of the public realm and neighbourhood distinctiveness;
- b) Is likely to result in long-term positive benefits in relation to the 'Biodiversity' SEA theme;
- c) Has a close focus on conserving and enhancing landscape and villagescape character in the parish, and on protecting and enhancing the setting and fabric of the historic environment;
- d) Sets out a range of provisions which will help ensure potential impacts on the setting of key heritage assets in the village are avoided and mitigated;
- e) Has a focus on supporting the development of high quality and distinctive villagescapes which will reinforce local character;
- f) Provides a close focus on policies which aim to reduce surface water flood risk as far as possible. Its inclusion of climate change allowances within flood risk assessments, drainage scheme proposals and seeking to ensure that new development effectively considers its impacts on surface water flood risk will help ensure that no significant adverse effects on surface water flood risk will take place as a result of the allocations taken forward through the Neighbourhood Plan, and increased resilience to flood risk is secured.
- g) Will initiate a number of beneficial approaches regarding the 'Transportation' SEA through supporting provisions which will encourage and facilitate walking and cycling as alternatives to the private car.

The report made one policy recommendation, relating to the connection between active modes of transport and carbon emissions. In this respect, recognising the relatively rural context of the Neighbourhood Plan area, and the consequent inevitable continued reliance on car-based journeys, the report advised that a policy acknowledgement of enhanced electric vehicle infrastructure in new

development would be a way in the Neighbourhood Plan could mitigate this concern. Suitably worded criteria were added to Policy 1: Services, Facilities & Infrastructure and Policy 3A: Design to address this recommendation.

Hence no change to site selection was required as a result of Strategic Environmental Assessment.

30.0 HABITATS REGULATIONS ASSESSMENT (HRA)

30.1 In parallel with the Regulation 14 pre-submission consultation on the Neighbourhood Plan, in September 2019 Breckland Council commissioned Norfolk County Council to perform a HRA screening of the Plan. That screening concluded that it was necessary for the Plan to undergo a Habitats Regulations Assessment. That assessment was carried out by AECOM. The results of the assessment did not influence the selection of sites to be allocated in the Neighbourhood Plan, but did recommend the addition of criteria to the policies for sites STNP1, STNP4, STNP7, STNP9, STNP15 and STNP16 requiring future developers to carry out surveys to establish if stone curlews are present on a site, and if so to propose effective mitigation measures at the time of a planning application.

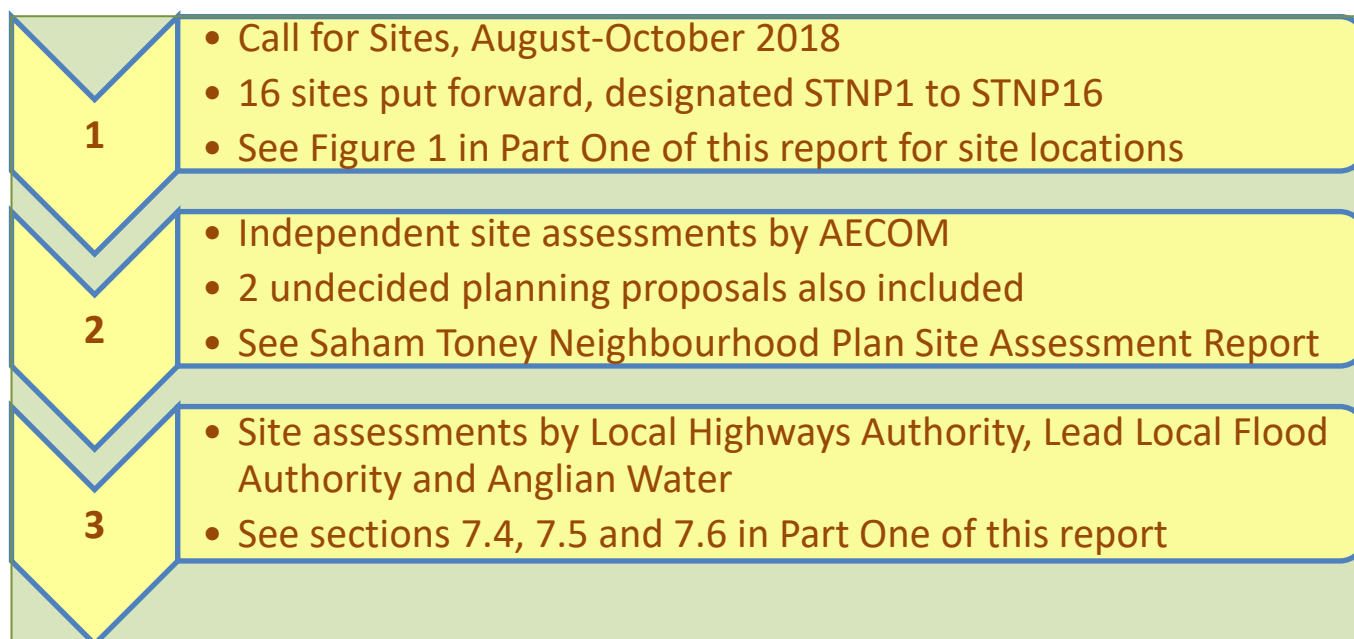


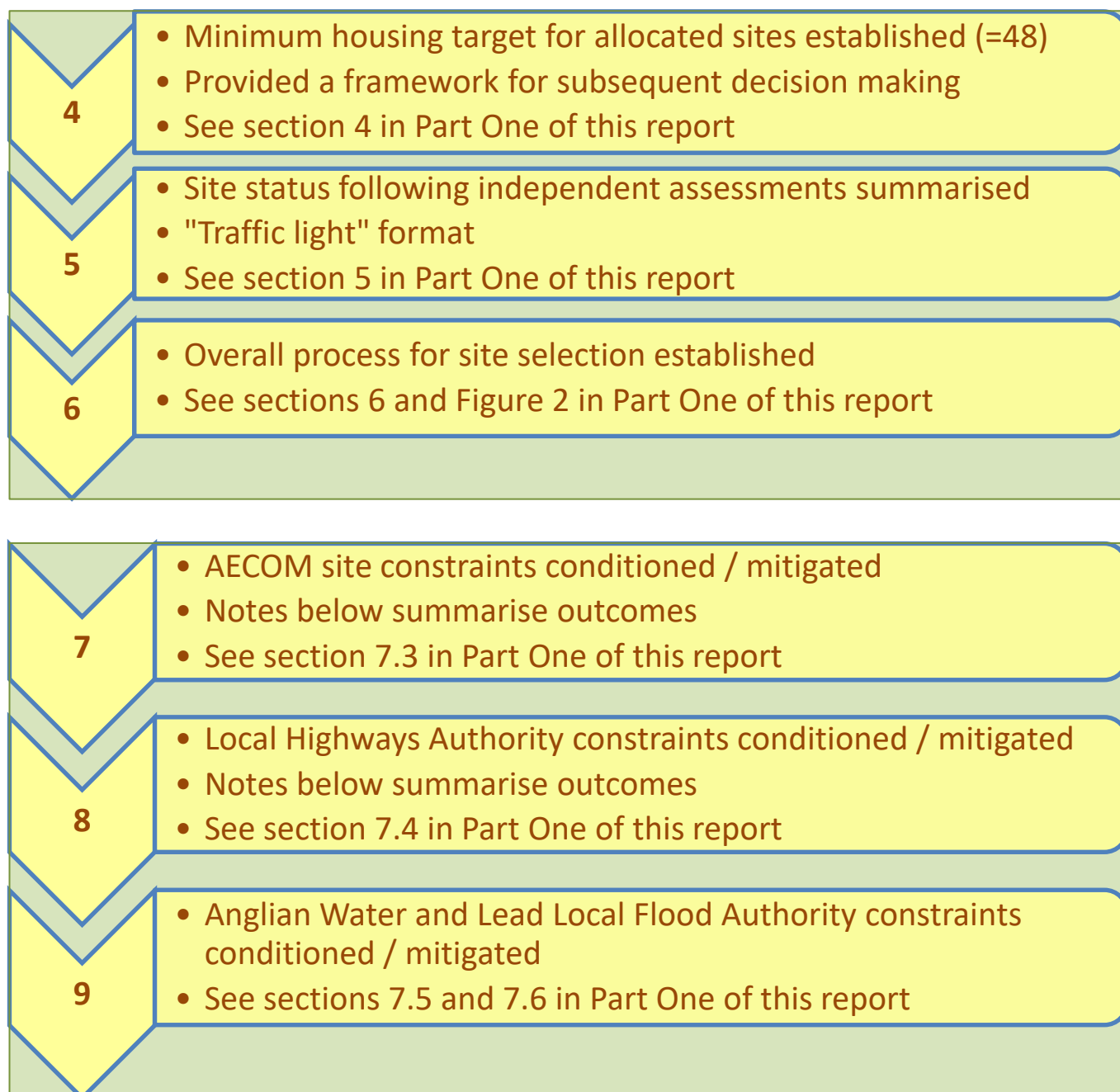
PART FOUR: EVOLUTION OF SITE SELECTION “ROAD MAP” AND SUMMARY CONCLUSIONS OF THE FOUR MAIN STAGES

31.0 OUTLINE OF PART FOUR

31.1 The selection of sites for allocation in the Saham Toney Neighbourhood Plan has been an objective, analytical process, carried out in an iterative manner, with refinements made progressively as more detailed information has become available. It was undertaken between October 2018, when the Call for Sites closed, and February 2020, when the Saham Toney Masterplanning Report was published and all responses to the pre-submission consultation on the Neighbourhood Plan had been reviewed, and where applicable, acted upon. The logic of the iterative process, and the reasoning for key decisions made at certain stages, may be difficult to follow given the amount and complexity of material addressed during the process - as evidenced by the length of this report. To aid understanding, this part of the report attempts to summarise the process and the evolution of the site selections to reflect the iterative assessment of progressively more refined data, as detailed below.

32.0 ROAD MAP

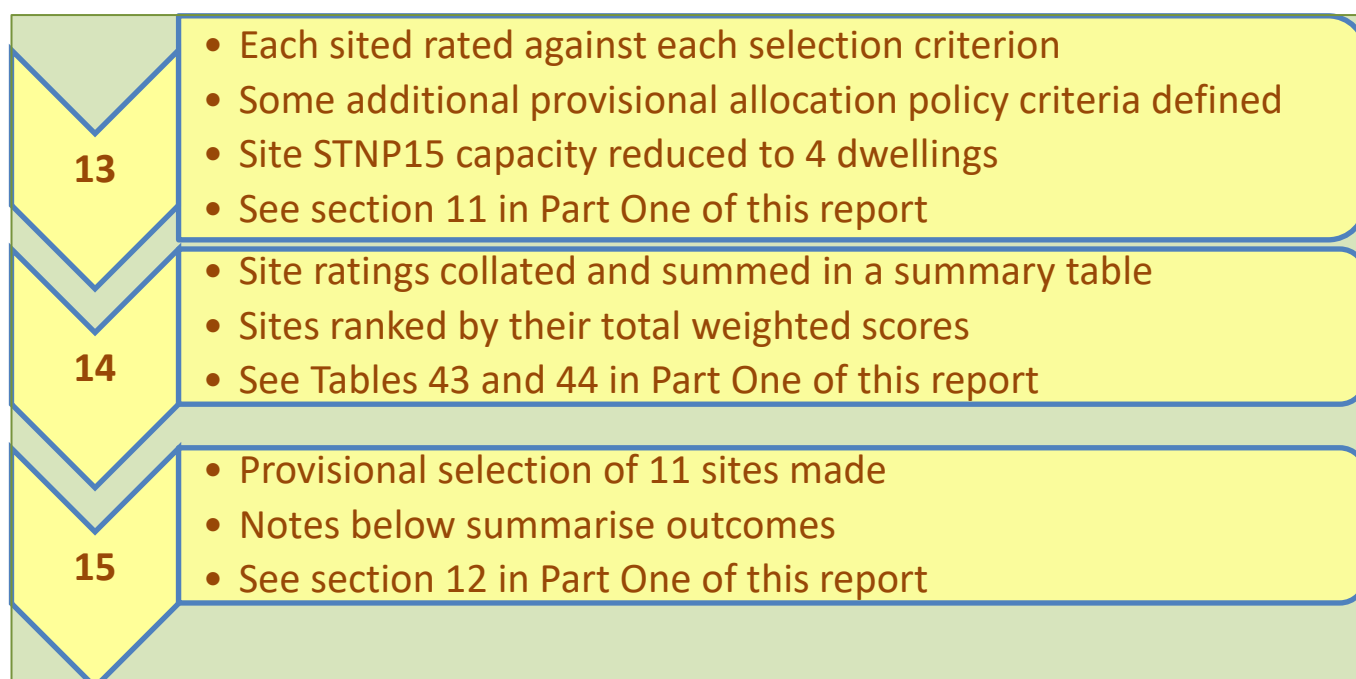
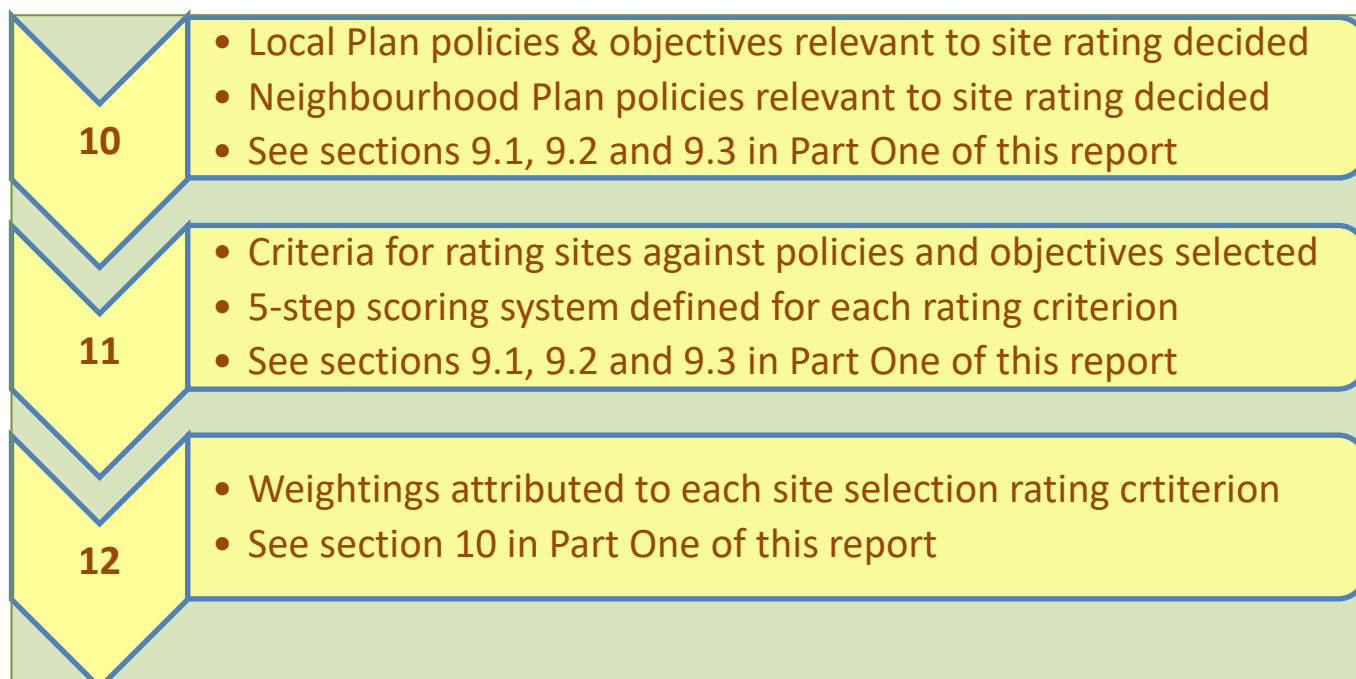




32.2 Notes to Stages 7, 8 and 9:

- 1) It was not possible to mitigate key constraints for the two undecided planning application sites. Hence, they were excluded from the selection process.
- 2) In many cases constraints were overcome by defining criteria to be included in site allocation policies should a site be selected. In other cases, it was concluded that further examination of constraints was required during the detailed site rating process.
- 3) In the case of sites STNP3, 8, 10, 11 and 15, not all constraints could be readily overcome. Although the sites remained in the process, it was determined that additional evidence was needed from site owners before their allocation could be considered.
- 4) The capacities of sites STNP1, STNP4, STNP5 and STNP7 were reduced to overcome coalescence constraints.
- 5) Reduced capacity / site area for sites STNP1 and STNP7 was also necessary to overcome constraints regarding settlement size and character. This was also the case for sites STNP16.

- 6) The overall capacity of sites STNP4, 5, 6 and 7 was limited to a total of 25 dwellings as a result of a Highways constraint.
- 7) The changes made to site capacities / areas at this stage were as follows:
 - a) STNP1 was reduced to 6 dwellings on an amended site area of approximately 0.55 hectares;
 - b) STNP4 was reduced to 10 dwellings on the original site area;
 - c) STNP5 was reduced to 4 dwellings on an amended site area of approximately 0.35 hectares;
 - d) STNP7 was reduced to 6 dwellings on an amended site area of approximately 0.48 hectares;
 - e) STNP16 was reduced to 17 dwellings on an amended site area of approximately 1.50 hectares.
- 8) The overall results of constraint conditioning / mitigation are summarised in “traffic light” format in Tables 19 and 20 in Part One of this report.



32.3 Notes to Stage 15

- 1) At this stage sites STNP3, 8, 10, 11 and 15 remained in the process only subject to the respective site owners providing evidence to mitigate outstanding key constraints.
- 2) Site pairs STNP11/15 and STNP12/16 were options. Sites STNP15 and STNP12 scored lower than the alternate options STNP11 and STNP16 respectively.
- 3) The best-rated sites satisfying the minimum total housing allocation were identified.
- 4) Sites with a negative overall rating were excluded from selection.
- 5) Site STNP3, although scoring positively, was also excluded as its outstanding constraint (flood risk) fundamentally counted against it being considered sustainable without additional evidence from the site owner to mitigate the constraint.
- 6) Other sites scoring positively were included in the provisional site selections, which at this stage comprised:
 - a) STNP1: 6 dwellings;
 - b) STNP2: 4 dwellings;
 - c) STNP4: 10 dwellings;
 - d) STNP5: 4 dwellings;
 - e) STNP6: 5 dwellings;
 - f) STNP7: 6 dwellings;
 - g) STNP9: 3 dwellings;
 - h) STNP11: 2 dwellings;
 - i) STNP13: 5 dwellings;
 - j) STNP14: 5 dwellings;
 - k) STNP16: 17 dwellings.

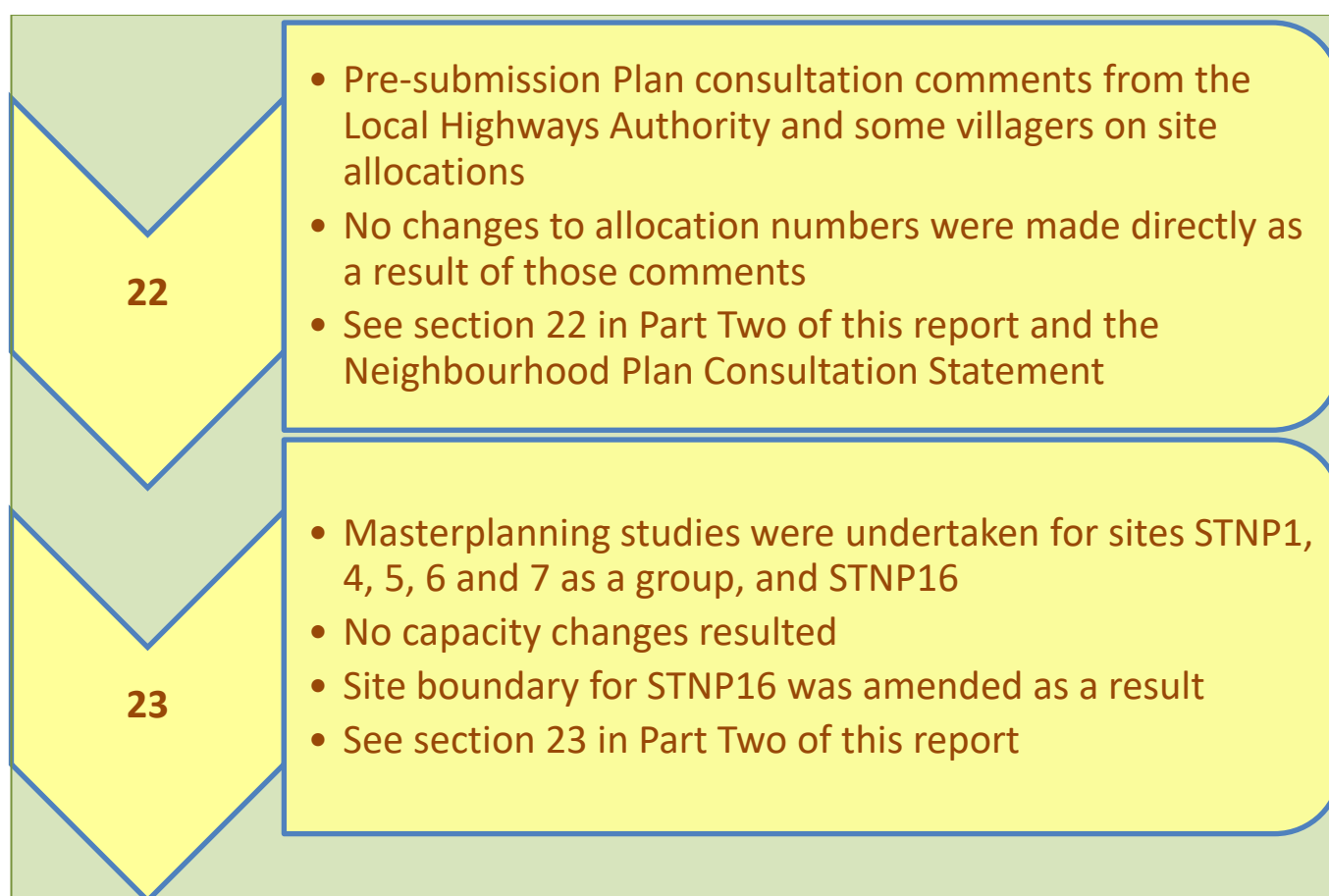
16	• Cumulative landscape impact of sites STNP4, 5 and 6 assessed • Impact determined as borderline acceptable, with appropriate mitigation • See section 13 in Part One of this report
17	• Landscape impact of site STNP16 assessed due to site size • Impact determined to be acceptable, with appropriate mitigation • See section 14 in Part One of this report
18	• Discussions and correspondence with site owners took place with regard to outstanding key constraints • Sites STNP3, 8 and 10 excluded due to lack of new evidence • Sites 11 and 15 constraint mitigated by owner, who decided to withdraw STNP11, which was replaced by STNP15 (for 6 houses) • See section 15.1 in Part One of this report

19	• Draft allocation policies were prepared for all provisionally selected sites and discussed with site owners • Notes below summarise outcomes • See section 15 in Part One of this report
20	• Final site selections were made for the pre-submission version of the Neighbourhood Plan • Site ratings were reassessed in line with changes made • See section 16 and Table 70 in Part One of this report
21	• Pre-submission allocation policy conditions were summarised • A provisional development schedule was defined • See sections 17 and 18 in Part One of this report • Pre-submission selection conclusions are summarised in sections 20 and 21 in Part One of this report

32.4 Notes to Stage 19:

- 1) The owners of site STNP1 advised that taking into account the cost of demolishing existing farm buildings and clearing up the site, development of only 6 dwellings would be economically viable, and that they wished to retain the originally proposed capacity of 10 dwellings. To avoid conflict with the landscape impact constraint that had resulted in the site capacity reduction, an amended site boundary was agreed that avoided such impact but allowed for 10 dwellings.
- 2) In the light of the flood risk constraint on site STNP3, the owners decided to formally withdraw the site from the selection process.
- 3) In the light of the highway access and highway network constraints on site STNP8, the owners decided to formally withdraw the site from the selection process.
- 4) After discussion with the owners of sites STNP4, 5, 6 and 7, mitigations to the highways constraint that limited overall capacity of the sites to 25 was agreed, based on development phasing and the addition of a policy requirement to provide traffic impact reports for each site at planning application site. As a result, the capacity of site STNP4 was increased to 13 dwellings.
- 5) Subject to the introduction of a “no above ground development” zone, plus future masterplanning and landscape impact review, it was agreed that the capacity of site STNP5 could be increased to 12 dwellings.
- 6) The owners of site STNP7 considered that limiting its capacity to 6 dwellings would make the site non-viable, given the need to remove existing buildings and hard-standings. By including a small area of greenfield land in the site, its capacity was increased to 8 dwellings.
- 7) As a result of the capacity changes for sites STNP4 and 5, the matrix-based landscape impact review was repeated for those sites in combination with STNP6, and found to remain acceptable, but only borderline so.
- 8) During discussions the owners of sites STNP4, 5, 6 and 7 proposed further increase to the overall capacity of their sites to a total of 62 dwellings (as compared with the increases noted above which gave a total of 38 dwellings). As set out in section 15 review of that proposal showed it to be unacceptable.

- 9) The owner of site STNP10 was unable to provide mitigations for the highway access and flood risk constraints. Although the owner did not formally withdraw the site, it was established that even if the constraints had been overcome, its overall rating would have only improved to zero, meaning it could not be considered sustainable. The site was therefore excluded from the selection process at that stage.
- 10) The owner of the two option sites STNP11 and 15 provided evidence to mitigate the highway access constraint. During discussion the site owner advised that following initial studies, only STNP15 was a viable option commercially. STNP11 was therefore withdrawn from the selection process. In parallel informal discussions with the Local Planning Authority highlighted a concern on its part about the low density of site STNP15. As a result, in agreement with the owner site capacity was increased to 6 dwellings.
- 11) After discussion with the owner of site STNP16, it was agreed to reduce the site capacity to 12, but to combine its future development with an adjacent site owned by the same person, that already had outline planning permission for 5 houses.



24

- Masterplanning studies were reviewed for landscape impact
- Concluded sites STNP5 and 6 were unacceptable
- Some increase to STNP4 capacity was deemed acceptable
- Preferred option for STNP16 was considered acceptable

25

- Sites STNP5 and 6 were excluded from allocation as a result
- Site STNP4 capacity was increased to 17 dwellings
- No changes to STNP1, 7 or 16
- **CHANGES REDUCED OVERALL ALLOCATION TO 70 DWELLINGS**

26

- Findings were confirmed by a revised matrix-based assessment, and secondary factors concerning landscape impact
- See sections 24, 25 and 26 in Part Two of this report

27

- Strategic Environmental Assessment of the Plan undertaken
- Supported the choice of 9 site allocations
- Concluded that the site allocations are environmentally acceptable

28

- Habitats Regulation Assessment of the Plan undertaken
- No changes to allocation of sites required
- Criteria added to some site allocation policies to protect stone curlews

32.5 With reference to the stages outlined above, Table 78 shows how the total potential housing allocation has evolved as the election process has evolved.

	STAGE IN THE PROCESS (see above)									
SITE	1	2	3	7/8/9	13	15	18	19	24/25	27/28
STNP1	10	10	10	6	6	6	6	10	10	10
STNP2	4	4	4	4	4	4	4	4	4	4
STNP3	4	4	4	4	4					
STNP4	12-15	12-15	25	10	10	10	10	13	17	17
STNP5	12-15	12-15		4	4	4	4	12	0	0
STNP6	5-6	5-6		5	5	5	5	5	0	0
STNP7	30-35	30-35		6	6	6	6	8	8	8
STNP8	40-50	40-50	40-50	40-50	40-50					
STNP9	3	3	3	3	3	3	3	3	3	3
STNP10	20	20	20	20	20					
STNP11	2	2	2	2	2	2				
STNP12	5	5	5	5	5					
STNP13	4-5	4-5	4-5	5	5	5	5	5	5	5
STNP14	5	5	5	5	5	5	5	5	5	5
STNP15	4-8	4-8	4-8	4	4		4	6	6	6
STNP16	35	35	35	17	17	17	17	12	12	12
PA-1		3	3							
PA-2		54	54							
PA-3							1			
PA-4							4			
TOTAL HOUSES	195-222	252-279	218-233	76-150	139-150	67	74	83	70	70

Table 78: Evolution of Site Allocation Housing Numbers

Notes to Table 78:

- a) Stage 1 = As proposed in response to the Call for Sites.
- b) Stage 2 = After site assessments by AECOM.
- c) Stage 3 = After site assessments by the Local Highways Authority, Lead Local Flood Authority and Anglian Water.
- d) Stages 7/8/9 = After conditioning and initial mitigation of site assessment constraints.
- e) Stage 13 = After initial rating of sites against selection criteria.
- f) Stage 15 = After provisional site selections based on initial site ratings and rankings.
- g) Stage 18 = After discussions with site owners about the provisional site selections.
- h) Stage 19 = After discussions with site owners about draft site allocation policies.
- i) Stages 24/25 = After masterplanning studies and a professional review of landscape impact of the sites included in those studies.
- j) Site PA-1 = site at Nilefields, Swaffham Road; subject of planning application 3PL/2019/0010/F.
- k) Site PA-2 = site at Meadow Farm, Chequers Lane; subject of planning application 3PL/2019/0011/F.
- l) Site PA-3 = site at 171 Hills Road; subject of planning application 3PL/2019/0748/O.
- m) Site PA-4 = site at Saham Tythe Barn, Chequers Lane; subject of planning application 3PL/2019/0808/D.