

**SAHAM TONEY**

**NEIGHBOURHOOD**

**DEVELOPMENT PLAN**

**2018 - 2036**



**SITE SELECTION REPORT**

## TABLE OF CONTENTS

<b>1.0 EXECUTIVE SUMMARY .....</b>	<b>3</b>
<b>2.0 OBJECTIVES .....</b>	<b>3</b>
<b>3.0 INTRODUCTION.....</b>	<b>3</b>
<b>4.0 OVERALL HOUSING ALLOCATION .....</b>	<b>6</b>
<b>5.0 STATUS OF POTENTIAL SITES FOLLOWING INDEPENDENT ASSESSMENT .....</b>	<b>7</b>
<b>6.0 PROCESS OF SITE SELECTION .....</b>	<b>10</b>
<b>7.0 SITE CONSTRAINT CONDITIONING.....</b>	<b>12</b>
<b>8.0 OVERALL RESULTS OF CONSTRAINT CONDITIONING.....</b>	<b>52</b>
<b>9.0 POLICY AND SUSTAINABILITY CONFORMANCE CHECK.....</b>	<b>59</b>
<b>10.0 WEIGHTING OF SITE SELECTION RATING CRITERIA .....</b>	<b>74</b>
<b>17.0 POLICY CONDITIONS FOR SELECTED SITES .....</b>	<b>75</b>
<b>18.0 TIMING OF DEVELOPMENT.....</b>	<b>76</b>
<b>APPENDIX A: DETAILS OF SITES PUT FORWARD IN RESPONSE TO A CALL FOR SITES.....</b>	<b>77</b>
<b>APPENDIX B: INFORMATION RELATING TO THE CONDITIONING OF SITE CONSTRAINTS .....</b>	<b>88</b>

## **1.0 EXECUTIVE SUMMARY**

With regard to housing and economic land availability assessment, Planning Practice Guidance states<sup>1</sup> “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.

The report 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.

## **2.0 OBJECTIVES**

The objectives of this report are as follows:

- a) To set the level of residential housing development in Saham Toney up till 2036;
- b) To specify sites to be allocated in the Neighbourhood Plan to meet the defined level of housing development;
- c) To define a number of reserve sites to ensure the planned housing delivery is maintained in the event of any allocated sites being withdrawn.

## **3.0 INTRODUCTION**

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 Plan<sup>2</sup>. 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; and additionally, reserve sites, if appropriate.

3.2 Stage 1 was carried out in two ways:

- a) The 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 1, with the site locations shown in Figure 1. Fuller details submitted for each site are given in Appendix A.

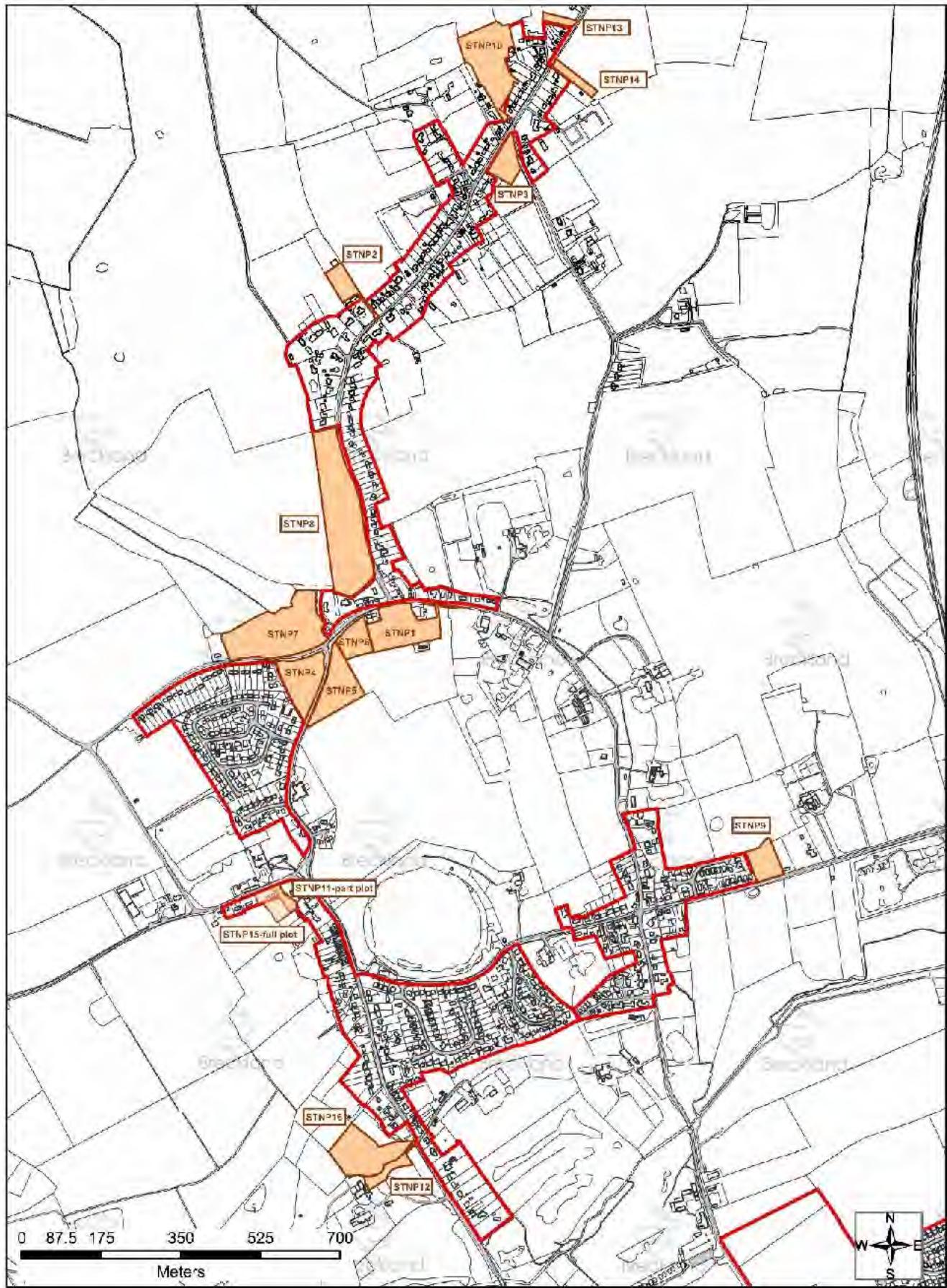
---

<sup>1</sup> Paragraph: 003 Reference ID: 3-003-20140306

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

<b>Site ID</b>	<b>Site Location</b>	<b>Site Area (ha)</b>	<b>Number of dwellings suggested by site proposer</b>
<b>STNP1</b>	Grange Farm Piggeries, Chequers Lane	0.98	10
<b>STNP2</b>	The Croft Piggery, 69, Hills Road	0.5	4
<b>STNP3</b>	Junction of Hills Road and Ploughboy Lane	0.246	4
<b>STNP4</b>	Junction of Pound Hill and Page's Lane	0.813	12-15
<b>STNP5</b>	Pound Hill East	1.014	12-15
<b>STNP6</b>	Page's Lane east, near Pound Hill junction	0.46	5-6
<b>STNP7</b>	Page's Lane Farm	1.86	30-35
<b>STNP8</b>	Hills Road south, opposite Dolphin Crescent	2.59	40-50
<b>STNP9</b>	Ovington Road	0.445	3
<b>STNP10</b>	Behind 129 & 131 Hills Road	1.6	20
<b>STNP11</b>	8 Richmond Road (option 1)	0.15	2
<b>STNP12</b>	Richmond Hall (option 1)	0.24	5
<b>STNP13</b>	Hill Farm, Hills Road	0.2	4-5
<b>STNP14</b>	Croft field, Hills Road	0.3	5
<b>STNP15</b>	8 Richmond Road (option 2)	0.4	4-8
<b>STNP16</b>	Richmond Hall (option 2)	3.48	20-35

**Table 1: Summary Details of Proposed Sites Put Forward**



**COPYRIGHT**  
This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Breckland District Council licence no 100019535. Published 2017.

**Figure 1: Location of Proposed Sites**

3.4 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 1, the potential total number of dwellings that might be delivered if all sites were to be allocated was between 180 and 222.

3.5 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 xx/xx/2019. The assessment was based on desk study, supplemented by site visits undertaken on a single day. The AECOM site assessment report<sup>3</sup> is presented separately as part of the evidence base for the Neighbourhood Plan.

3.6 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.

3.7 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.

3.8 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.

3.9 The process for stage 3 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 1 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 3.7.

The emerging Local Plan allocates Saham Toney a minimum total of 33 new dwellings. Two amendments are proposed to this allocation, as explained below:

### **4.1.1 To Reflect an Increased Household Projection for Breckland District**

---

<sup>3</sup> Saham Toney Neighbourhood Plan Site Assessment report, AECOM, April 2019

4.1.1.1 The 33 new dwellings allocated to Saham Toney 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.

4.1.1.2 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 emerging 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 to apply a 10% buffer, as being more in accord with planning guidance. Applying that buffer results in a total allocation across the district of 17,942.

4.1.1.3 A simple, but reasonable way to determine how this might affect Saham Toney's allocation is to make a pro-rata increase. Hence a revised minimum allocation is:

$$(33 \times 17942) / 16630 = 35.6; \text{ set at } 36$$

#### **4.1.2 To Include an Affordability Factor**

4.1.2.1 Government Planning 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 is covered by transition arrangements for the application of revised NPPF requirements and is thus not required to apply the adjustment. However, when the Local Plan is subsequently updated, it will be required to do so.

4.1.2.2 The Neighbourhood Plan is not covered by the same transition arrangements, and hence it is prudent to apply the adjustment from the outset.

The potentially amended Breckland household projection 2011-2036 = 16,311 (as set out in section 1).

$$\text{The adjustment factor} = 1 + \{[(\text{Local affordability ratio} - 4) \div 4] \times 0.25\}$$

The median local affordability ratio for Breckland is 9.26 (9.04?) (source: Office for National Statistics online dataset "Ratio of House Price to Workplace Based Earnings", April 2018), resulting in an adjustment factor of 1.32875.

Applying this increase to the result obtained in 4.1.1.3 gives a revised minimum housing allocation:

$$36 \times 1.32875 = 47.835; \text{ set at } \mathbf{48}$$

4.2 As a result of the calculations set out above, when selecting sites for allocation, that will be done such that in combination, they will deliver no fewer than 48 new dwellings over the Plan period.

### **5.0 STATUS OF POTENTIAL SITES FOLLOWING INDEPENDENT ASSESSMENT**

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

**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 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, 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 constraint conditioning<sup>4</sup> undertaken are given in section 6;
- 2) Each site for which constraint conditioning allowed it to be considered potentially suitable for allocation 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 delivery target. See section 7 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 closely to the lowest ranked one provisionally selected, or were otherwise sustainable, were added to the selection list, on the basis that it was unreasonable to exclude sites that scored very similarly to the initial list as such differences could be accounted for in a margin of error in the analysis, and to ensure that sustainable sites were not excluded, given that the target of 48 houses is a minimum.

---

<sup>4</sup> 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.

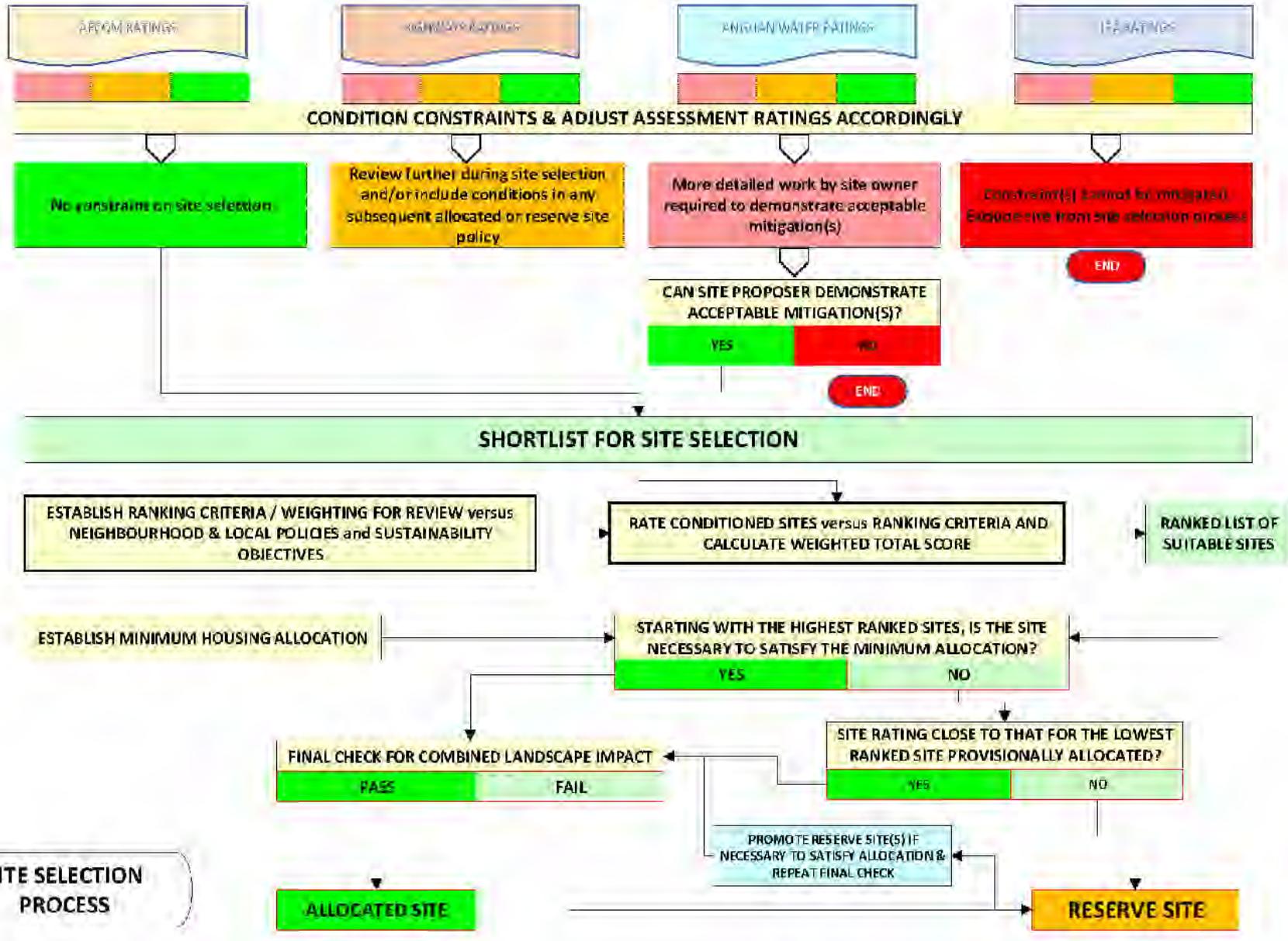


Figure 2: Site Selection Process Flowchart

## **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 make 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 site selection stage as potentially suitable for allocation, and which, if any, should be excluded from that process.

7.2 Table 2 shows 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 or reserve site 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 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 hence the Watton boundary is irrelevant. Furthermore, even were it relevant, neither the approved Breckland Development Plan nor the emerging Local Plan 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. <b>Conclusion: Constraint mitigated for the site to be considered for site selection. The Local Highway Authority's conditions to 3PL/2015/1430/F to be criteria in any site allocation or reserve site policy for site.</b>
STNP2	Unsuitable at present but likely to be able to be upgraded to be suitable	A proposal to improve highway access submitted under planning application 3PL/2015/0009/F was accepted by the Local Highway Authority in its response. Both are given in Appendix B2. <b>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 or reserve site policy for the site</b>
STNP3	Suitable access could be provided onto Hills Road	<b>Conclusion: No further mitigation required for the site to be considered for site selection</b>
STNP4	Suitable access could be provided onto Pound Hill or Page's Lane	<b>Conclusion: No further mitigation required for the site to be considered for site selection</b>
STNP5	Suitable access could be provided onto Pound Hill	<b>Conclusion: No further mitigation required for the site to be considered for site selection</b>

<b>STNP6</b>	Suitable access could be provided onto Pound Hill	<b>Conclusion: No further mitigation required for the site to be considered for site selection</b>
<b>STNP7</b>	Upgrade of existing access onto Page's Lane likely to be possible	<b>Conclusion: No further mitigation required for the site to be considered for site selection</b>
<b>STNP8</b>	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. <b>Conclusion: Site proposer would have to demonstrate a feasible scheme for highway access prior to any selection of this site for allocation or as a reserve site</b>
<b>STNP9</b>	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. <b>Conclusion: Constraint mitigated. Proposed access provision to form part of any allocation or reserve site policy for this site</b>
<b>STNP10</b>	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. <b>Conclusion: Site proposer would have to demonstrate a feasible scheme for highway access prior to any selection of this site for allocation or as a reserve site</b>
<b>STNP11</b>	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. <b>Conclusion: Site proposer would have to demonstrate a feasible scheme for highway access prior to any selection of this site for allocation or as a reserve site</b>
<b>STNP12</b>	Upgrade of existing access likely to be achievable	<b>Conclusion: No further mitigation required for the site to be considered for site selection</b>
<b>STNP13</b>	No existing access, but suitable provision could be made from Hills Road	<b>Conclusion: No further mitigation required for the site to be considered for site selection</b>
<b>STNP14</b>	No existing access, but suitable provision could be made from Hills Road	<b>Conclusion: No further mitigation required for the site to be considered for site selection</b>
<b>STNP15</b>	Existing access to the site is unsuitable for the intended use because it is narrow,	Existing access is a driveway for a single dwelling. <b>Conclusion: Site proposer would have to demonstrate a feasible scheme for highway access prior to any selection of this site for allocation or as a reserve site</b>

	visibility is constrained by existing dwellings and it is close to a sharp turn in Richmond Road	
STNP16	Upgrade of existing access likely to be achievable	<b>Conclusion: No further mitigation required for the site to be considered for site selection</b>
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. <b>Conclusion: No further mitigation required for the purposes of site selection</b>
NILEFIELDS	Fundamental concerns	The planning application does not include an access scheme and has been opposed by the Local Highway Authority. <b>Conclusion: Site proposer would have to demonstrate a feasible scheme for highway access prior to any selection of this site for allocation or as a reserve site</b>

**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. <b>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.</b>
STNP2	No pedestrian pavement along Hills Road	See review of local highway authority constraints in section 6.4.6
STNP3	No pedestrian pavement	See review of local highway authority constraints in section 6.4.6
STNP4	Existing pedestrian access	<b>Conclusion: No mitigation required for the site to be considered for site selection</b>
STNP5	Existing pedestrian access	<b>Conclusion: No mitigation required for the site to be considered for site selection</b>
STNP6	Existing pedestrian access	<b>Conclusion: No mitigation required for the site to be considered for site selection</b>
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. <b>Conclusion: Provision of a paved footpath would be a condition of any site allocation or reserve site policy for this site</b>
<b>STNP8</b>	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. <b>Site proposer would have to demonstrate a feasible scheme for paved footpath access prior to any selection of this site for allocation or as a reserve site</b>
<b>STNP9</b>	No pedestrian pavement	The site proposer has agreed with the Local Highway Authority that a pedestrian pavement would be provided along the front of the site. See indicative drawing in Appendix B3. <b>Conclusion: No further mitigation required for the purposes of site selection. Include the footpath provision as a criterion of any site allocation or reserve site policy for this site</b>
<b>STNP10</b>	No pedestrian pavement	See review of local highway authority constraints in section 6.4.6. <b>Site proposer would have to demonstrate a feasible scheme for paved footpath access prior to any selection of this site for allocation or as a reserve site</b>
<b>STNP11</b>	Existing pedestrian access	<b>Conclusion: No mitigation required for the site to be considered for site selection</b>
<b>STNP12</b>	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. <b>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 or reserve site policy for this site</b>
<b>STNP13</b>	No pedestrian pavement	See review of local highway authority constraints in section 6.4.6
<b>STNP14</b>	No pedestrian pavement	See review of local highway authority constraints in section 6.4.6
<b>STNP15</b>	Existing pedestrian access	<b>Conclusion: No mitigation required for the site to be considered for site selection</b>
<b>STNP16</b>	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. <b>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 or reserve site policy for this site</b>
<b>MEADOW FARM</b>	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. <b>Conclusion: No further mitigation required for the purposes of site selection</b>
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. <b>Conclusion: Site proposer would have to demonstrate a feasible scheme for pedestrian access prior to any selection of this site for allocation or as a reserve site</b>

**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	<b>Conclusion: Mitigation of flood risk will be assessed as part of site selection and would be a condition of any site allocation or reserve policy for this site.</b>
STNP2	Minimal, unlikely to require mitigation	<b>Conclusion: No mitigation required for the site to be considered for site selection</b>
STNP3	Some impact, mitigation required	<b>Conclusion: Mitigation of flood risk will be assessed as part of site selection and would be a condition of any site allocation or reserve policy for this site.</b>
STNP4	Some impact, mitigation required	<b>Conclusion: Mitigation of flood risk will be assessed as part of site selection and if necessary, would be a condition of any site allocation or reserve policy for this site.</b>
STNP5	Minimal impact, no mitigation required	<b>Conclusion: No mitigation required for the site to be considered for site selection</b>
STNP6	Minimal impact, no mitigation required	<b>Conclusion: No mitigation required for the site to be considered for site selection</b>
STNP7	Some impact, mitigation required	<b>Conclusion: Mitigation of flood risk will be assessed as part of site selection and if necessary, would be a condition of any site allocation or reserve policy for this site.</b>
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. <b>Conclusion: Mitigation of flood risk will be assessed as part of site selection and if necessary, would be a condition of any site allocation or reserve policy for this site.</b>

<b>STNP9</b>	Some impact, mitigation required	<b>Conclusion: Mitigation of flood risk will be assessed as part of site selection and would be a condition of any site allocation or reserve policy for this site.</b>
<b>STNP10</b>	Some impact, mitigation required	<b>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 as a reserve site</b>
<b>STNP11</b>	Minimal impact, no mitigation required	<b>Conclusion: No mitigation required for the site to be considered for site selection</b>
<b>STNP12</b>	Minimal impact, no mitigation required	<b>Conclusion: No mitigation required for the site to be considered for site selection</b>
<b>STNP13</b>	Minimal impact, no mitigation required	<b>Conclusion: No mitigation required for the site to be considered for site selection</b>
<b>STNP14</b>	Minimal impact, no mitigation required	<b>Conclusion: No mitigation required for the site to be considered for site selection</b>
<b>STNP15</b>	Minimal impact, no mitigation required	<b>Conclusion: No mitigation required for the site to be considered for site selection</b>
<b>STNP16</b>	Minimal impact, no mitigation required	<b>Conclusion: No mitigation required for the site to be considered for site selection</b>
<b>MEADOW FARM</b>	Some impact, mitigation required	<b>Conclusion: Mitigation of flood risk will be assessed as part of site selection and would be a condition of any site allocation or reserve policy for this site.</b>
<b>NILEFIELDS</b>	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. <b>Conclusion: Site proposer would have to demonstrate a feasible scheme for mitigation of flood risk prior to any selection of this site for allocation or as a reserve site</b>

**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.

<b>SITE NAME</b>	<b>LEVEL OF AECOM CONSTRAINT (ECOLOGY)</b>	<b>CONSTRAINT REVIEW / MITIGATION NOTES</b>
<b>STNP1</b>	Unknown	<b>Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory</b>

		<b>ecological appraisal would be a condition of any site allocation or reserve policy for this site.</b>
<b>STNP2</b>	Unknown	<b>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 or reserve policy for this site.</b>
<b>STNP3</b>	Unknown, but may provide habitat for a number of species	<b>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 or reserve policy for this site.</b>
<b>STNP4</b>	Unknown, but may provide habitats	<b>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 or reserve policy for this site.</b>
<b>STNP5</b>	Unknown, but may provide habitats	<b>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 or reserve policy for this site.</b>
<b>STNP6</b>	Unknown, but may provide habitats	<b>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 or reserve policy for this site.</b>
<b>STNP7</b>	Unknown, but may provide habitats	AECOM assessment highlights a need for mitigation of flood risk. <b>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 or reserve policy for this site.</b>
<b>STNP8</b>	Unknown, but may provide habitats	<b>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 or reserve policy for this site.</b>
<b>STNP9</b>	Potential value	<b>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 or reserve policy for this site.</b>
<b>STNP10</b>	Unknown	<b>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 or reserve policy for this site.</b>
<b>STNP11</b>	Unknown	<b>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 or reserve policy for this site.</b>
<b>STNP12</b>	Unknown	<b>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 or reserve policy for this site.</b>
<b>STNP13</b>	Unknown	<b>Conclusion: No mitigation required for the site to be considered for site selection. The provision of a satisfactory</b>

		<b>ecological appraisal would be a condition of any site allocation or reserve policy for this site.</b>
<b>STNP14</b>	Unknown	<b>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 or reserve policy for this site.</b>
<b>STNP15</b>	Unknown	<b>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 or reserve policy for this site.</b>
<b>STNP16</b>	Potential value	<b>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 or reserve policy for this site.</b>
<b>MEADOW FARM</b>	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. <b>Conclusion: Site selection dependent on planning application response from ecology specialists</b>
<b>NILEFIELDS</b>	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. <b>Conclusion: Provision of a satisfactory ecological appraisal by the site proposer would be required before this site could be considered for site selection</b>

**Table 6: Conditioning of Ecology Value Constraints**

#### 7.3.7 Landscape sensitivity

The three parts of the Saham Toney Parish Landscape Character Assessment 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
<b>STNP1</b>	Medium to high sensitivity	The site is an area of moderate-high combined landscape sensitivity. <b>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 or reserve site policy for this site</b>
<b>STNP2</b>	Medium sensitivity	<b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>
<b>STNP3</b>	Medium sensitivity	<b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>

<b>STNP4</b>	High sensitivity	The site is an area of moderate-high combined landscape sensitivity. <b>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 or reserve site policy for this site</b>
<b>STNP5</b>	High sensitivity	The site is an area of moderate-high combined landscape sensitivity. <b>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 or reserve site policy for this site</b>
<b>STNP6</b>	High sensitivity	The site is an area of moderate-high combined landscape sensitivity. <b>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 or reserve site policy for this site</b>
<b>STNP7</b>	High sensitivity	The site is an area of moderate-high combined landscape sensitivity. <b>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 or reserve site policy for this site</b>
<b>STNP8</b>	Medium sensitivity	The site is in an area of moderate landscape and high visual sensitivity. It therefore has moderate-high combined sensitivity. <b>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 or reserve site policy for this site</b>
<b>STNP9</b>	Medium sensitivity	<b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>
<b>STNP10</b>	Medium sensitivity	<b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>
<b>STNP11</b>	Medium sensitivity	<b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>
<b>STNP12</b>	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. <b>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</b>

		<b>be a condition of any site allocation or reserve site policy for this site</b>
<b>STNP13</b>	Medium sensitivity	<b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>
<b>STNP14</b>	Medium sensitivity	<b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>
<b>STNP15</b>	Medium sensitivity	<b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>
<b>STNP16</b>	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. <b>Conclusion: No further action required with regard to being shortlisted for site selection.</b> In accordance with AECOM notes, acceptable screening of the site would be a condition of a site allocation or reserve site policy if this site is selected. The provision of a satisfactory landscape and visual impact assessment would be a condition of any site allocation or reserve site policy for this site
<b>MEADOW FARM</b>	Medium sensitivity	<b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>
<b>NILEFIELDS</b>	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. <b>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</b>

**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. <b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>
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. <b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>
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. <b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>
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. <b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>
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. <b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>
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. <b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>
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. <b>Conclusion: Take the land classification into account when selecting sites, if this site progresses to that stage</b>
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. <b>Conclusion: Take the land classification into account when selecting sites, if this site progresses to that stage</b>
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. <b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>

<b>STNP10</b>	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. <b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>
<b>STNP11</b>	No loss	<b>Conclusion: No action required with regard to being shortlisted for site selection.</b>
<b>STNP12</b>	No loss	<b>Conclusion: No action required with regard to being shortlisted for site selection.</b>
<b>STNP13</b>	No loss	<b>Conclusion: No action required with regard to being shortlisted for site selection.</b>
<b>STNP14</b>	Some loss	The assessment notes the land is Grade 3. Since it produces a cereal crop (barley) it should be deemed Grade 3a. <b>Conclusion: Take the land classification into account when selecting sites, if this site progresses to that stage</b>
<b>STNP15</b>	No loss	<b>Conclusion: No action required with regard to being shortlisted for site selection.</b>
<b>STNP16</b>	No loss	<b>Conclusion: No action required with regard to being shortlisted for site selection.</b>
<b>MEADOW FARM</b>	No loss	<b>Conclusion: No action required with regard to being shortlisted for site selection.</b>
<b>NILEFIELDS</b>	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. <b>Conclusion: No further action required with regard to being shortlisted for site selection.</b>

**Table 8: Conditioning of Agricultural land Loss Constraints**

### 7.3.9 Heritage impact

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

		<b>impact into account when selecting sites, if this site progresses to that stage</b>
<b>STNP8</b>	Mitigation may be required	Possible mitigation relates to Page's Place (Gr. II listed) approximately 40m to the south of the site. <b>Conclusion: Take the possible heritage impact into account when selecting sites, if this site progresses to that stage</b>
<b>STNP9</b>	Mitigation may be required	Possible mitigation relates to Brick Kiln Farmhouse (Gr. II listed) approximately 120m from the site. <b>Conclusion: Take the possible heritage impact into account when selecting sites, if this site progresses to that stage</b>
<b>STNP10</b>	No impact	<b>Conclusion: No action required with regard to being shortlisted for site selection.</b>
<b>STNP11</b>	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. <b>Conclusion: Take the possible heritage impact into account when selecting sites, if this site progresses to that stage</b>
<b>STNP12</b>	No impact	<b>Conclusion: No action required with regard to being shortlisted for site selection.</b>
<b>STNP13</b>	No impact	<b>Conclusion: No action required with regard to being shortlisted for site selection.</b>
<b>STNP14</b>	No impact	<b>Conclusion: No action required with regard to being shortlisted for site selection.</b>
<b>STNP15</b>	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. <b>Conclusion: Take the possible heritage impact into account when selecting sites, if this site progresses to that stage</b>
<b>STNP16</b>	No impact	<b>Conclusion: No action required with regard to being shortlisted for site selection.</b>
<b>MEADOW FARM</b>	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. <b>Conclusion: Take account of expert responses to the HIA during site selection if this site progresses to that stage</b>
<b>NILEFIELDS</b>	Unlikely to require mitigation	AECOM assessment note refers to a scheduled monument 650m from the site. <b>Conclusion: No further action required with regard to site being shortlisted for site selection.</b>

**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. 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. <b>Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
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. <b>Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
STNP3	Unknown	AECOM assessment notes potential loss of habitats which would require further ecological surveys. <b>Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
STNP4	Unknown	AECOM assessment notes potential loss of habitats. <b>Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
STNP5	Unknown	AECOM assessment notes potential loss of habitats which would require further ecological surveys. <b>Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
STNP6	Unknown	While classing impact as “unknown” the AECOM assessment also notes potential loss of habitats which would therefore require further ecological surveys. <b>Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
STNP7	Unknown	AECOM highlighted potential impact to habitats. <b>Conclusion: Provision of an acceptable ecological appraisal, describing</b>

		<b>appropriate mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
<b>STNP8</b>	Unknown	AECOM highlighted potential impact to habitats. <b>Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
<b>STNP9</b>	Unknown	While classing impact as “unknown” the AECOM assessment also notes potential loss of habitats which would therefore require further ecological surveys. <b>Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
<b>STNP10</b>	Unknown	AECOM highlighted potential impact to habitats. <b>Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
<b>STNP11</b>	Unknown	AECOM highlighted potential impact to habitats. <b>Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
<b>STNP12</b>	Unknown	AECOM highlighted potential impact to habitats. <b>Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
<b>STNP13</b>	Unknown	AECOM highlighted potential impact to habitats. <b>Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
<b>STNP14</b>	Unknown	AECOM highlighted potential impact to habitats. <b>Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
<b>STNP15</b>	Unknown	AECOM highlighted potential impact to habitats. <b>Conclusion: Provision of an acceptable ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
<b>STNP16</b>	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. <b>Conclusion: Provision of an acceptable ecological appraisal, describing appropriate</b>

		<b>mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
<b>MEADOW FARM</b>	Potential impact	Preliminary ecological appraisal submitted with planning application identified possible threats to great crested newts and bats. <b>Conclusion: Provision of an acceptable final ecological appraisal, describing appropriate mitigation measures where applicable, to be a condition of any site allocation or reserve site policy for this site.</b>
<b>NILEFIELDS</b>	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. <b>Conclusion: Provision of a satisfactory ecological appraisal by the site proposer would be required before this site could be considered for site selection</b>

**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 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 or selected as a reserve site, 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. <b>Conclusion: No further action required with regard to site being shortlisted for site selection. Any site allocation or reserve site policy shall include conditions requiring an updated contamination risk assessment, based on a full intrusive ground investigation, and setting out an acceptable mitigation strategy.</b>

<b>STNP2</b>	Possible contamination from industrial use	<b>Conclusion:</b> No further action required with regard to site being shortlisted for site selection. Any site allocation or reserve site policy shall include conditions requiring a contamination risk assessment, based on a full intrusive ground investigation, and setting out an acceptable mitigation strategy
<b>STNP3</b>	Not likely to be affected	<b>Conclusion:</b> No further action required with regard to site being considered for selection.
<b>STNP4</b>	Not likely to be affected	<b>Conclusion:</b> No further action required with regard to site being considered for selection.
<b>STNP5</b>	Current use not considered to result in any significant contamination	<b>Conclusion:</b> No further action required with regard to site being considered for selection.
<b>STNP6</b>	Not likely to be affected	<b>Conclusion:</b> No further action required with regard to site being considered for selection.
<b>STNP7</b>	Current use should not cause contamination	AECOM assessment overlooks the potential from agricultural fertiliser. <b>Conclusion:</b> No further action required with regard to site being shortlisted for site selection. Any site allocation or reserve site policy shall include conditions requiring a contamination risk assessment, based on a full intrusive ground investigation, and setting out an acceptable mitigation strategy
<b>STNP8</b>	Current use should not cause contamination	AECOM assessment overlooks the potential from agricultural fertiliser. <b>Conclusion:</b> No further action required with regard to site selection. Any site allocation or reserve site policy shall include conditions requiring a contamination risk assessment, based on a full intrusive ground investigation, and setting out an acceptable mitigation strategy
<b>STNP9</b>	Current use would not cause contamination	<b>Conclusion:</b> No further action required with regard to site being considered for selection.
<b>STNP10</b>	Current use would not cause contamination	<b>Conclusion:</b> No further action required with regard to site being considered for selection.
<b>STNP11</b>	Current use would not cause contamination	<b>Conclusion:</b> No further action required with regard to site being considered for selection.
<b>STNP12</b>	Current use would not cause contamination	<b>Conclusion:</b> No further action required with regard to site being considered for selection.
<b>STNP13</b>	Not likely to be affected	<b>Conclusion:</b> No further action required with regard to site selection.
<b>STNP14</b>	Potential from agricultural fertiliser	<b>Conclusion:</b> No further action required with regard to being considered for site selection. Any site allocation or reserve site policy shall include conditions requiring a contamination risk assessment, based on a full intrusive ground investigation, and setting out an acceptable mitigation strategy

<b>STNP15</b>	Current use would not cause contamination	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
<b>STNP16</b>	Current use would not cause contamination	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
<b>MEADOW FARM</b>	Current use should not cause contamination	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
<b>NILEFIELDS</b>	Current use should not cause contamination	<b>Conclusion: No further action required with regard to site being considered for selection.</b>

**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 or reserve site policy**

<b>SITE NAME</b>	<b>LEVEL OF AECOM CONSTRAINT (INFRASTRUCTURE CROSSING SITE)</b>	<b>CONSTRAINT REVIEW / MITIGATION NOTES</b>
<b>STNP1</b>	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.
<b>STNP2</b>	Site unlikely to be affected	HV powerline running across the field. LV powerline located next to the entrance gate.
<b>STNP3</b>	Site unlikely to be affected	Power and telephone lines which would need to be mitigated or moved. Unlikely to be significant constraint.
<b>STNP4</b>	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
<b>STNP5</b>	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.
<b>STNP6</b>	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
<b>STNP7</b>	Site unlikely to be affected	LV cable runs above the hedgerow between the field and the Pages Lane. Unlikely to be a significant constraint.

<b>STNP8</b>	Site unlikely to be affected	HV powerline running across the field however unlikely to pose significant constraint.
<b>STNP9</b>	Site unlikely to be affected	HV powerline running above the plot. Unlikely to pose a significant constraint.
<b>STNP10</b>	Site unlikely to be affected	HV powerline and BT line but unlikely to pose significant constraint
<b>STNP11</b>	Site unlikely to be affected	Power service cable and BT service cable are running above the plot and connect to the house
<b>STNP12</b>	Site unlikely to be affected	Some power and BT telephone lines along boundary of site. Unlikely to pose significant constraint.
<b>STNP13</b>	Site unlikely to be affected	Low Voltage (LV) along the eastern boundary. Unlikely to pose a significant constraint.
<b>STNP14</b>	Site unlikely to be affected	Telephone cables along Hills Road but unlikely to cause significant constraint.
<b>STNP15</b>	Site unlikely to be affected	Power service cable and BT service cable are running above the plot and connect to the house.
<b>STNP16</b>	Site unlikely to be affected	Some power and BT telephone lines along boundary of site. Unlikely to pose significant constraint.
<b>MEADOW FARM</b>	Site unlikely to be affected	Telephone cables along Chequers Lane but unlikely to cause significant constraint.
<b>NILEFIELDS</b>	Overhead lines unlikely to be significant. Anglian Water assets may affect site layout	<p>Two sets of overhead lines crossing the site, unlikely to represent significant issue</p> <p>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;</p> <p>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.</p> <p>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. <b>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</b></p>

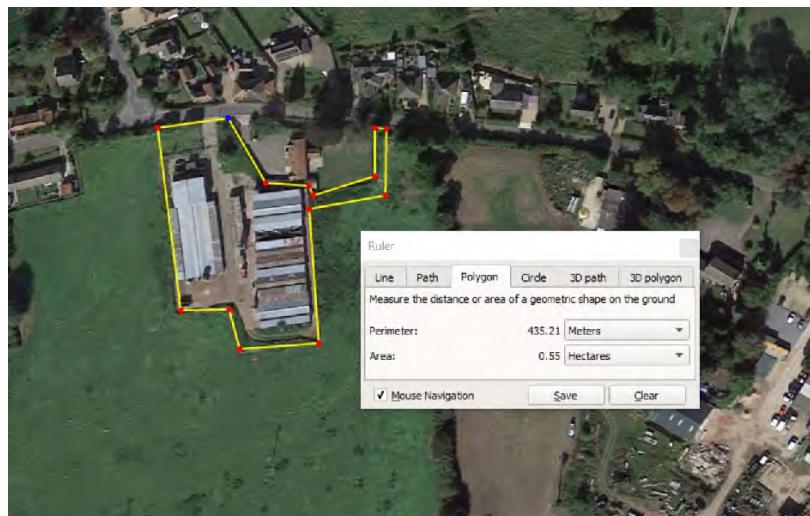
**Table 12: Conditioning of Infrastructure Crossing Site Constraints**

#### 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

<b>SITE NAME</b>	<b>LEVEL OF AECOM CONSTRAINT (COALESCENCE)</b>	<b>CONSTRAINT REVIEW / MITIGATION NOTES</b>

STNP1	No	<p>Contrary to the AECOM conclusion, the Saham Toney Parish Landscape Character Assessment, Part Two, Fringe Sensitivity Assessment<sup>5</sup>, 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 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.</p> <p><b>Conclusion:</b> 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:</p> 
STNP2	No	<b>Conclusion:</b> No further action required with regard to site being considered for selection.
STNP3	No	<b>Conclusion:</b> No further action required with regard to site being considered for selection.
STNP4	Potentially, particularly if STNP5, STNP6 and STNP7 are also developed	<b>Conclusion:</b> 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	<b>Conclusion:</b> 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	<b>Conclusion:</b> Take this into account when selecting sites, if this site progresses to that stage, including combined effect with other adjacent potential sites

<sup>5</sup> By Lucy Batchelor-Wylam Chartered Member of the Landscape Institute, January 2019

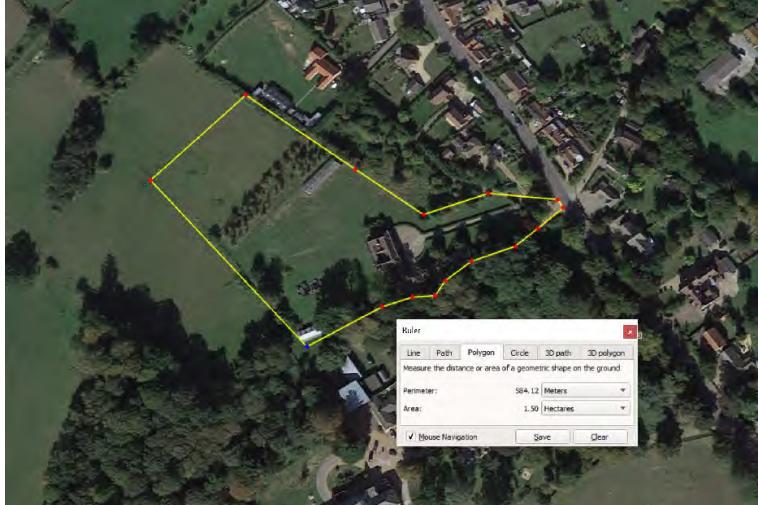
	gap that it currently provides. Coalescence could occur if STNP4, STNP6 and STNP7 are also developed	
STNP7	Development would reduce the gap between Saham Toney and Saham Hills and could result in coalescence, particularly if STNP4, STNP5 and STNP6 are also developed	<b>Conclusion: At the proposed scale the site cannot be considered for site selection, but could be reviewed for a smaller number of dwellings. See also highway assessments conditioning</b>
STNP8	No	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
STNP9	No	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
STNP10	No	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
STNP11	No	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
STNP12	No	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
STNP13	No	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
STNP14	No	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
STNP15	No	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
STNP16	No	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
MEADOW FARM	No	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
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. The site is not in Watton, and clearly extension of Watton's built form into Saham Toney is coalescence. <b>Conclusion: This constraint cannot be mitigated. Site ruled out of the site selection process</b>

**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 or 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". <b>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 6.3.18</b>
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. <b>Conclusion: No further action required with regard to site being considered for selection.</b>
STNP3	Unlikely	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
STNP4	Unlikely	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
STNP5	Unlikely	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
STNP6	Unlikely	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
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. <b>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</b>
STNP8	Scale of the site may change the size and/or character of the settlement.	<b>Conclusion: At the proposed scale the site cannot be considered for site selection, but could be reviewed for a smaller number of dwellings</b>
STNP9	No	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
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. <b>Conclusion: At the proposed scale the site cannot be considered for site selection, but could be reviewed for a smaller number of dwellings.</b>

<b>STNP11</b>	No	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
<b>STNP12</b>	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. <b>Conclusion: Take the above into account when selecting sites, if this site progresses to that stage</b>
<b>STNP13</b>	No	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
<b>STNP14</b>	No	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
<b>STNP15</b>	No	<b>Conclusion: No further action required with regard to site being considered for selection.</b>
<b>STNP16</b>	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. <b>Conclusion: Reduce site size to 17<sup>6</sup> 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</b>



<sup>6</sup> c. 50% of proposed total

<b>MEADOW FARM</b>	Site is detached from the existing settlement	<b>Conclusion: Take this into account when selecting sites, if this site progresses to that stage</b>
<b>NILEFIELDS</b>	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 application document which assert the site is part of Watton, when in fact it is in Saham Toney. <b>Conclusion: This constraint cannot be mitigated. Site ruled out of the site selection process</b>

**Table 14: Conditioning of Impact on Size / Character of Settlement Constraints**

#### 7.3.19 Amenity Issues

SITE NAME	LEVEL OF AECOM CONSTRAINT (RESIDENTIAL AMENITY)	CONSTRAINT REVIEW / MITIGATION NOTES
STNP1	None	<b>Conclusion: No further action required with regard to site selection.</b>
STNP2	No	<b>Conclusion: No further action required with regard to site selection.</b>
STNP3	No	<b>Conclusion: No further action required with regard to site selection.</b>
STNP4	No	<b>Conclusion: No further action required with regard to site selection.</b>
STNP5	No	<b>Conclusion: No further action required with regard to site selection.</b>
STNP6	No	<b>Conclusion: No further action required with regard to site selection.</b>
STNP7	No	<b>Conclusion: No further action required with regard to site selection.</b>
STNP8	Unlikely	<b>Conclusion: No further action required with regard to site selection.</b>
STNP9	No	<b>Conclusion: No further action required with regard to site selection.</b>
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	<b>Conclusion: Take this into account when selecting sites, if this site progresses to that stage</b>

	nuisance to the adjacent dwellings	
<b>STNP11</b>	Unlikely, consideration would need to be given to existing residential dwellings	<b>Conclusion: Take this into account when selecting sites, if this site progresses to that stage</b>
<b>STNP12</b>	No	<b>Conclusion: No further action required with regard to site selection.</b>
<b>STNP13</b>	Potential for issues of disturbance – adjacent to working farm	<b>Conclusion: Take this into account when selecting sites, if this site progresses to that stage</b>
<b>STNP14</b>	No	<b>Conclusion: No further action required with regard to site selection.</b>
<b>STNP15</b>	Unlikely, consideration would need to be given to existing residential dwellings	<b>Conclusion: Take this into account when selecting sites, if this site progresses to that stage</b>
<b>STNP16</b>	No	<b>Conclusion: No further action required with regard to site selection.</b>
<b>MEADOW FARM</b>	No	<b>Conclusion: No further action required with regard to site selection.</b>
<b>NILEFIELDS</b>	Potential to impact the amenity of nearby properties	<b>Conclusion: Take the possible amenity impact into account when selecting sites, if this site progresses to that stage</b>

**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 journeys<sup>7</sup>”. 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, a 'severe' impact is deemed occur when: -

- a) Queue lengths (and blocking back to previous junctions), delay and locational context, the Degree of Saturation<sup>8</sup>, Practical Reserve Capacity<sup>9</sup>, 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).

---

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

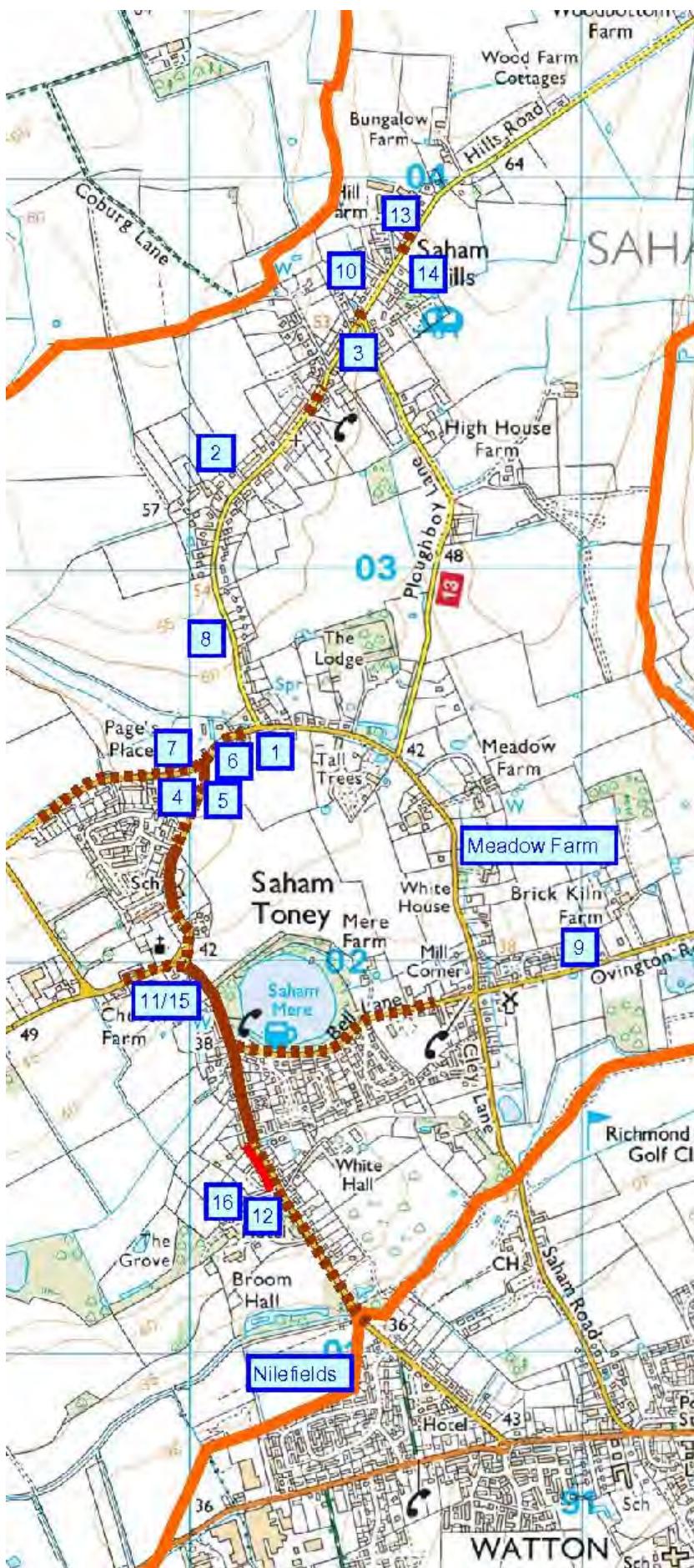
<sup>8</sup> The degree of saturation of an intersection (typically under traffic signal control) or road is a measure of how much demand it is experiencing compared to its total capacity

<sup>9</sup> 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

7.4.1.5 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’.

#### 7.4.2 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.



**Fig. 3 Paved footpaths on highway routes**

#### Legend

- Parish boundary — orange line
- Footpath on both sides of highway — brown line
- Footpath on one side of highway — dashed brown line
- Planned footpath committed under planning permission — red line
- Scale: 1 grid square = 1km x 1km
- Proposed site — blue box

#### 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.

Site ID	Constraints			Site suitable?	Local Highway Authority Remarks
	A	N	F		
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 6.3.1 and Appendix B1. **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 or reserve site policy for site.**

7.4.4.2 Site STNP2. This constraint has been conditioned in section 6.3.1 and Appendix B2. **Conclusion: Constraint mitigated for the purposes of site selection, subject to the proposed highway access upgrade proposal being a criterion in any site allocation or reserve site policy for the site.**

7.4.4.3 Site STNP11. This site was reviewed in section 6.3.1. 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 or as a reserve site.**

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 or reserve site policy for site.**

7.4.4.5 Site STNP15. This site was reviewed in section 6.3.1. 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 or as a reserve site.**

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 or reserve site 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 those sites when such was identified 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 6.3.1 and Appendix D2). 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. See Local Highway Authority correspondence in Appendix B5. **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 or reserve 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 or as a reserve site.**

7.4.5.4 Site STNP9: Pre-application correspondence from the Local Highway Authority to the site proposer (see Appendix B3) 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 or as a reserve site.**

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 or as a reserve site.**

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 or reserve site.**

#### 7.4.6 Conditioning of footpath constraints

##### 7.4.6.1 Sites STNP2, STNP3, STNP10, STNP13 and STNP14

The approximate distances of these sites from the village primary school are:

STNP2: 1330m

STNP3: 1670m

STNP10: 1850m

STNP13: 2015m

STNP14: 1950m

Given the above, and considering the number of dwellings proposed for each site 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. 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.

**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 or as a reserve site.**

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, STP6 and STNP7

7.4.7.1 As noted in Table 16, the Local Highway Authority 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 or as a reserve site 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:



STNP6: 5 dwellings.

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



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 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.	Assets Affected	ADM/C		WM		SGPE			Overall RAG rating
			Assets Affected	Comments	Water Resource	Supply Network	Used Water	Water Recycling Centre (WRC)	WRC 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 or reserve 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 not significantly exceed 48 (see section 4.0), and that 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 prosed 54 new dwellings. **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.**

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 factor 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.**

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.

<b>Site number</b>	<b>Would Local Flood Risk / Surface Water Drainage constraints be severe enough to prevent development of this site?</b>	<b>Level of Constraint</b>	<b>Recommendations</b>	<b>Major issues / Comments</b>
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 down stream 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 down stream 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 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 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 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 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 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	Significant information	A flow path, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps,

		for heavy constraints.	required at a planning stage.	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 within this flow path. There is also reports flooding down stream 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 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 or reserve 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 or reserve 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.

**Table 19. Summary of Site Assessment Results Following Conditioning**

Table 19 Legend:

<b>Conditioning improves rating</b>		
<b>Conditioning reduces rating</b>		
<b>Site proposer may be able to demonstrate acceptable constraint mitigation</b>	*	
<b>Constraint cannot be mitigated</b>		
<b>Proposed site size reduced to mitigate constraint</b>	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 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.

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

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;

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;

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;

Site STNP7: Due to the site as proposed leading to coalescence of settlement clusters; its inappropriate scale and location with respect to its character area and sensitivity, and Local Highway Authority constraint on the combined capacity of sites STNP4-7, both size and capacity reduced;

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 4 to 7.

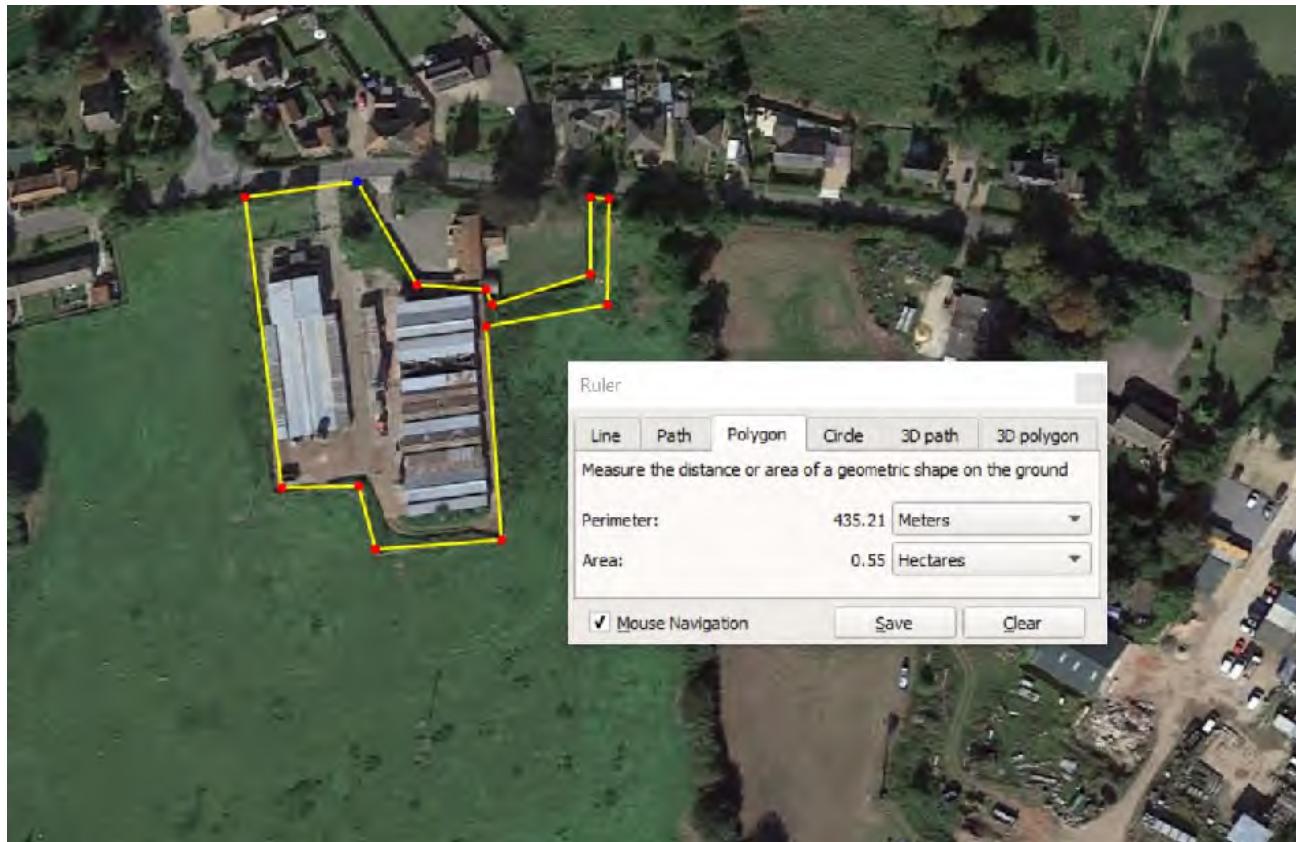


Figure 4: Revised Site Boundary for Site STNP1

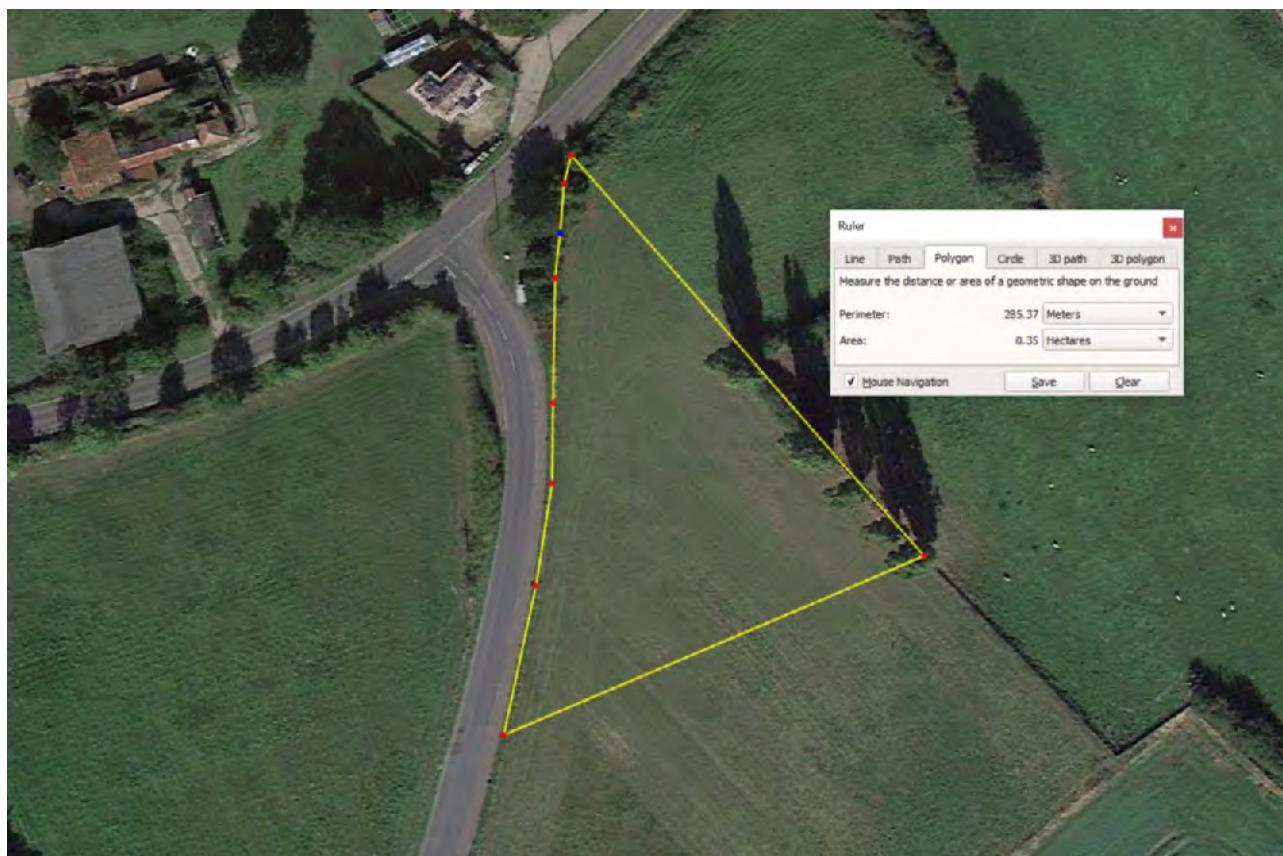


Figure 5: Revised Site Boundary for Site STNP5

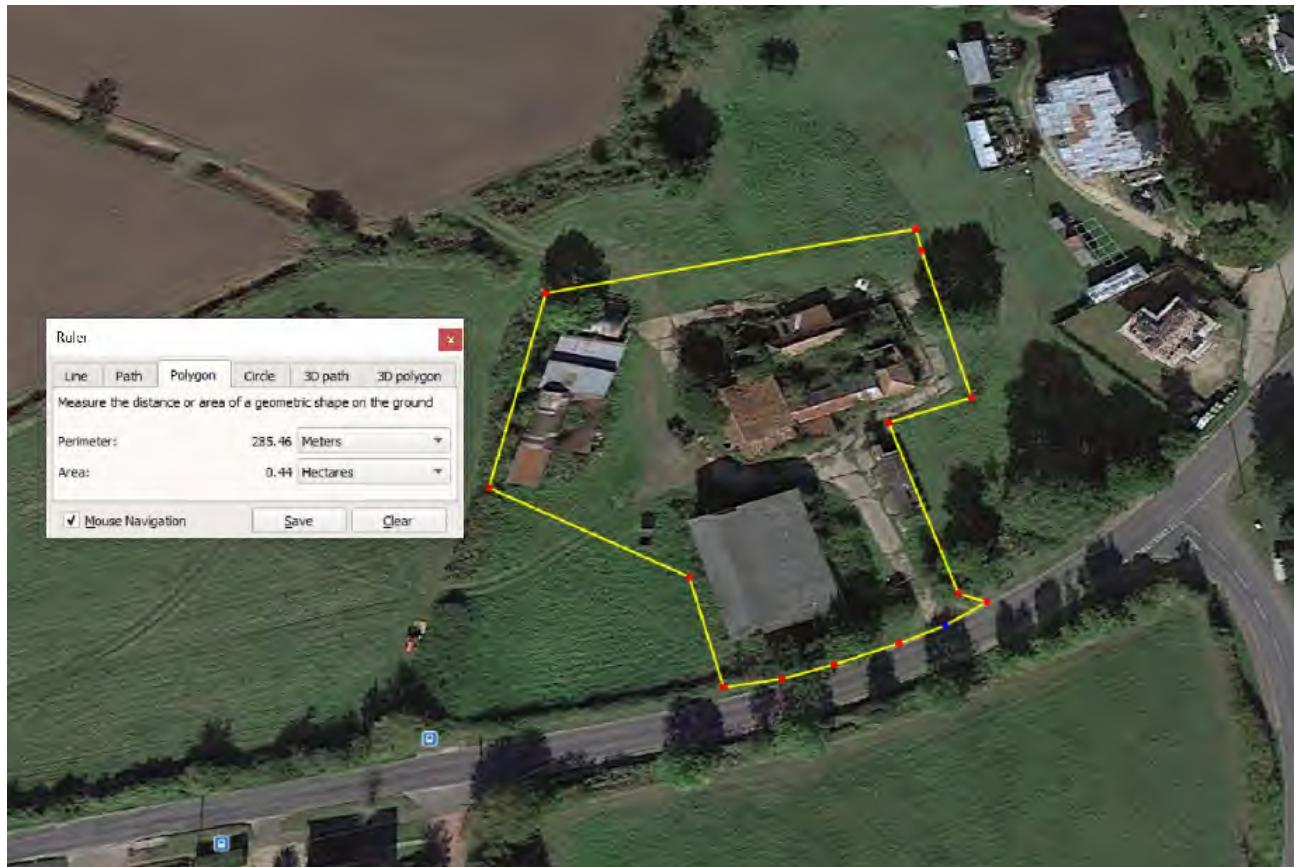


Figure 6: Revised Site Boundary for Site STNP7

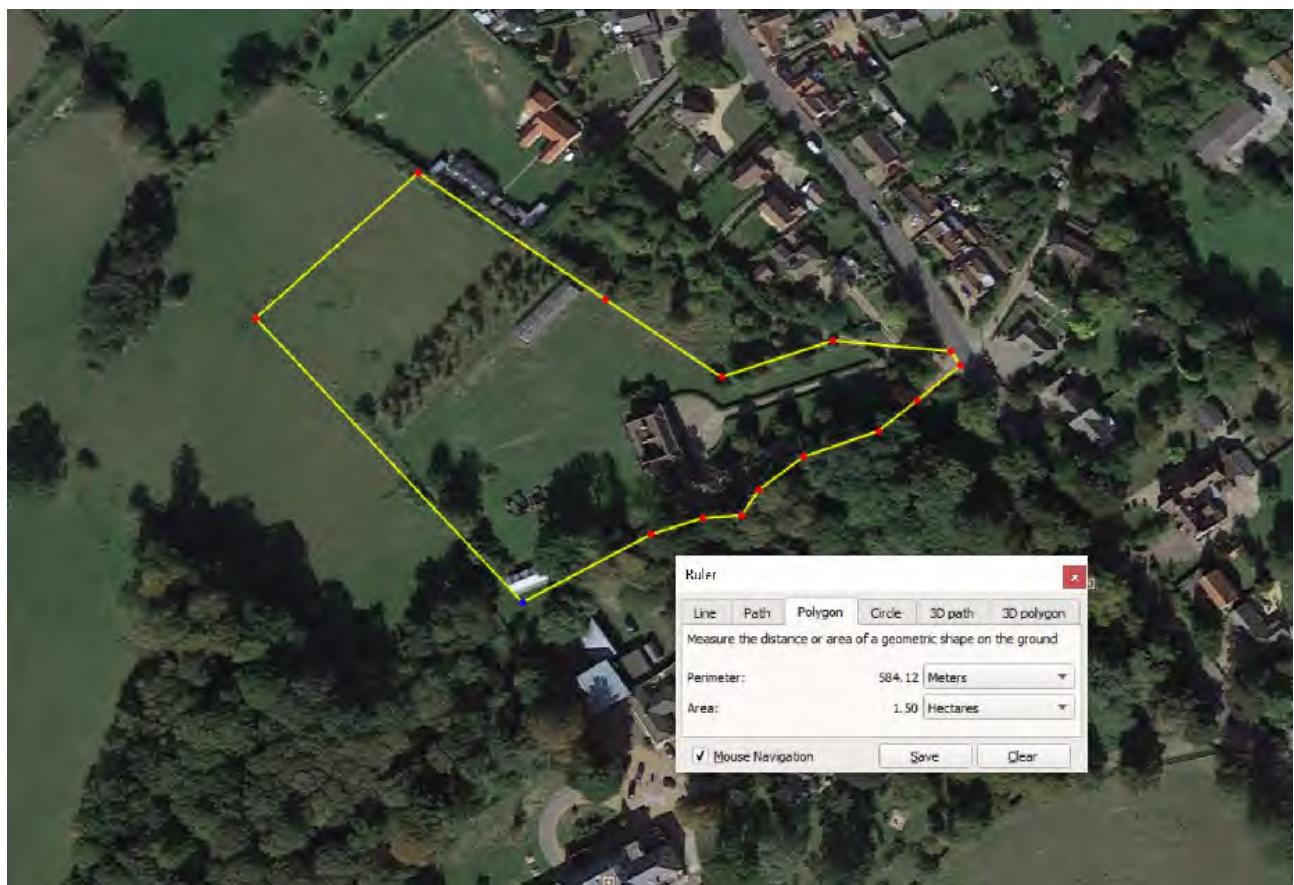


Figure 7: Revised Site Boundary for Site STNP16

## **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 out<sup>10</sup> 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 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 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.*
- 2) *Development proposals should identify assets of archaeological significance.*

---

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

The first of these criteria is covered 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 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.

<b>Table 22: Local Plan Sustainability Objectives</b>				
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 storage systems and maintain and	6. To adapt to climate change and avoid, reduce and manage flood risk.	10. Conserve and where appropriate enhance the historic environment	14. Improve the quality, range and accessibility of essential services and facilities	18 Help people gain access to satisfying work appropriate to their skills, potential and place of residence

enhance water quality				
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 hectares<sup>11</sup>;
- 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;

---

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

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.

<b>Policy</b>	<b>Policy class</b>	<b>Relevant to site selection?</b>	<b>Notes on relevance to site selection</b>
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 - 2U: Individual Site Allocations	A	No	Will be decided as a result of the site selection process
2V: Reserved Sites	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 and Their Relevance to Site Selection**

Notes:

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

Class A: Very important policy in terms of site selection criteria;

Class B: Important policy in terms of site selection criteria;

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 are set out<sup>12</sup> 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 order to reflect a wish to redress the current balance of house sizes, in terms of site selection they are scored negatively.

---

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

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).*

<b>Area Number</b>	<b>Density Guideline (dwellings per hectare)</b>	<b>Area Number</b>	<b>Density Guideline (dwellings per hectare)</b>
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	<b>ALL</b>	<b>11.0</b>
<b>Policy 3B, TABLE 3B.1: APPROXIMATE HOUSING DENSITIES BY AREA</b>			

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 visibility<sup>13</sup> 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 highway<sup>14</sup> 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;

---

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

<sup>14</sup> Width not less than 5.5m as

- 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<sup>15</sup> 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.

#### 9.3.2.7 Policy 7B: Key Views

---

<sup>15</sup> Width less than 5.5m

- 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.

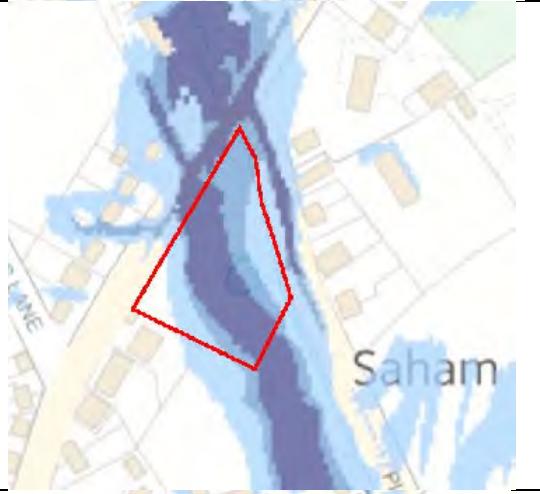


**Figure 8: Environment Agency Surface Water Flood Risk Map for the Area**

SITE ID	SITE AREA (ha)	SUGGESTED NUMBER OF DWELLINGS <sup>16</sup> (CONDITIONED)	SUMMARY OF SURFACE WATER FLOOD RISK	EXTRACT FROM SURFACE WATER FLOOD RISK MAP <sup>17</sup>
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	

<sup>16</sup> As put forward by the site proposer

<sup>17</sup> 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	<p>A narrow band at medium/low risk runs north-south across the centre of the site.</p> <p>Page's Lane, immediately to the north of the site is at high/medium risk.</p> <p>Pound Hill, immediately to the east of the site is at medium/low risk.</p> <p>The remainder of the site is at very low risk.</p>	

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 constraints<sup>18</sup>;

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:

<b>CRITERIA</b>	<b>POLICY FROM WHICH CRITERIA IS TAKEN</b>	<b>POLICY CLASS</b>	<b>WEIGHT</b>
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

<sup>18</sup> 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.

## 17.0 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 or reserve 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 66.

Constraint Description	Relevant Sites (to be edited as required when final list of allocated is confirmed)
Highway Access	STNP1: LHA conditions to 3PL/2015/1430/F STNP2: LHA conditions to 3PL/2015/0009/F STNP3: Access must be via Hills Road 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)	STNP3, STNP7
Ecological Appraisal and Mitigation Measures	All allocated and reserve 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 and reserve sites
Sympathetic Landscaping	All allocated and reserve sites
Ground Contamination Risk Assessment, Based on A Full Intrusive Ground Investigation	STNP1, STNP2, STNP7, STNP14
Infrastructure Mitigation	All allocated and reserve sites
Amenity	STNP13 (Farm disturbance)
Amenity Land Provision	STNP16

Highways: Site Size	STNP4, STNP5, STNP6, STNP7: combined number of dwellings not greater than 25
Highway Widening / Passing Places	STNP3, STNP13, STNP14
Anglian Water Constraints: Assets Affected	STNP3, 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

**Table 66. Summary of Policy Conditions**

## 18.0 TIMING OF DEVELOPMENT

To follow discussion with site proposers...

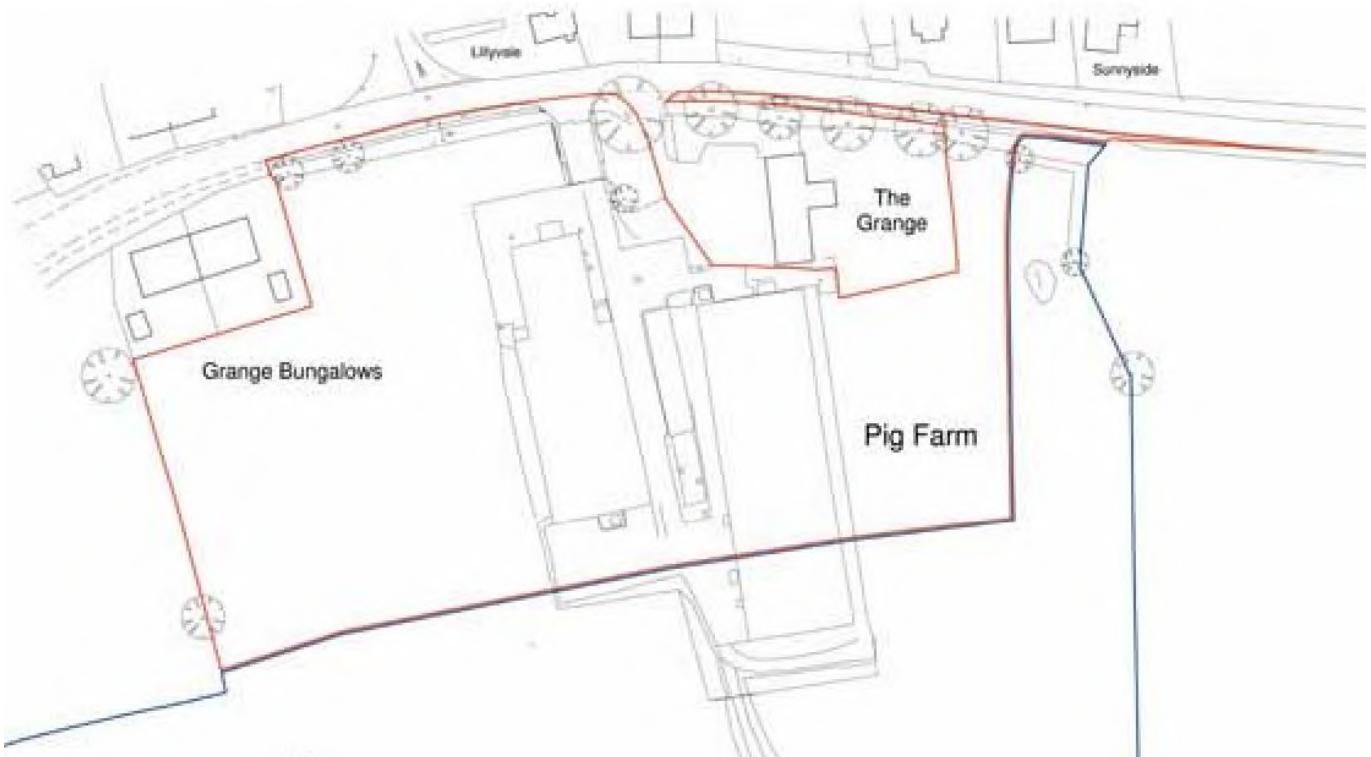
## APPENDIX A: DETAILS OF SITES PUT FORWARD IN RESPONSE TO A CALL FOR SITES

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 18. Relevant drawings submitted are also given for each site. Site photos may be found in the AECOM Site Assessment Report, April 2019.

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

Table 67: 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

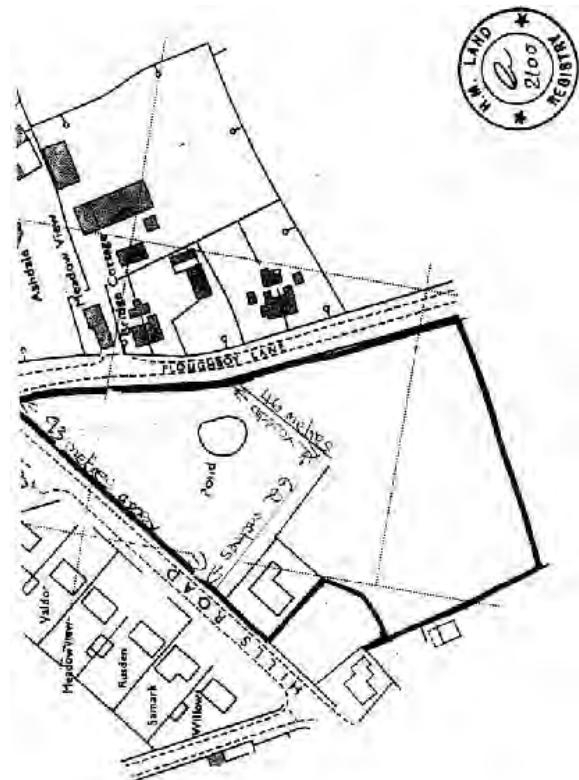
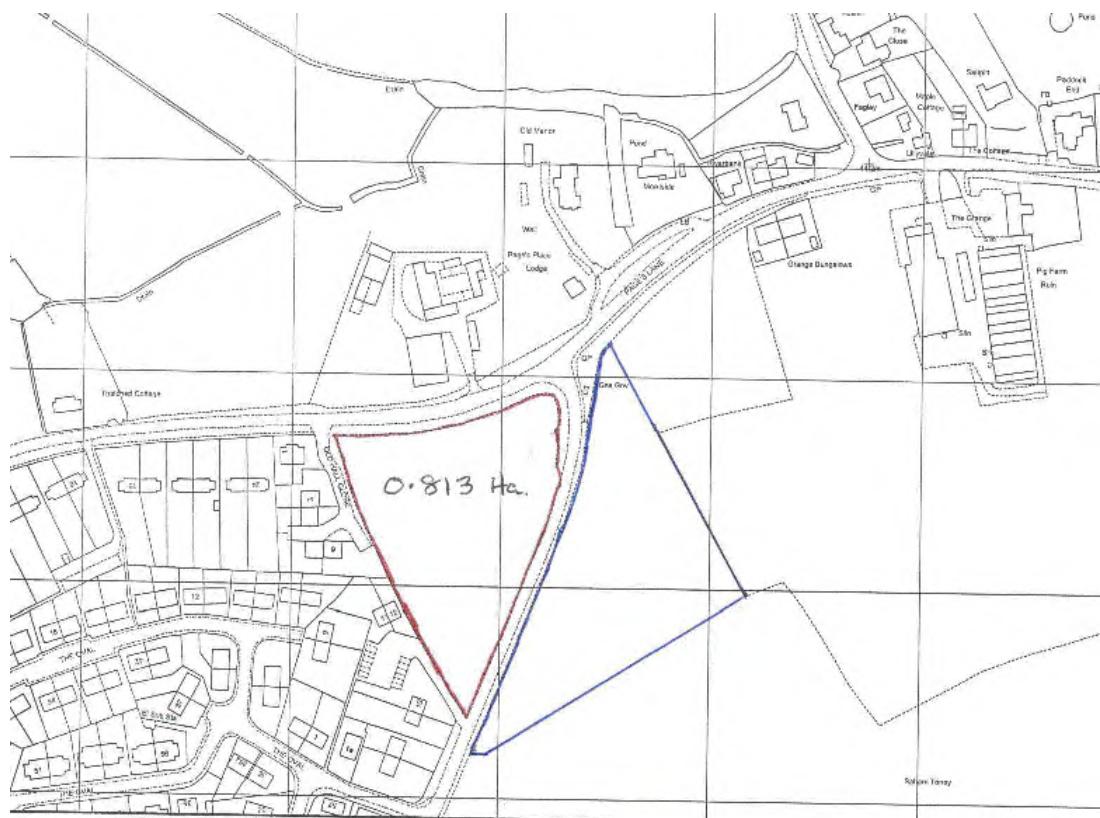


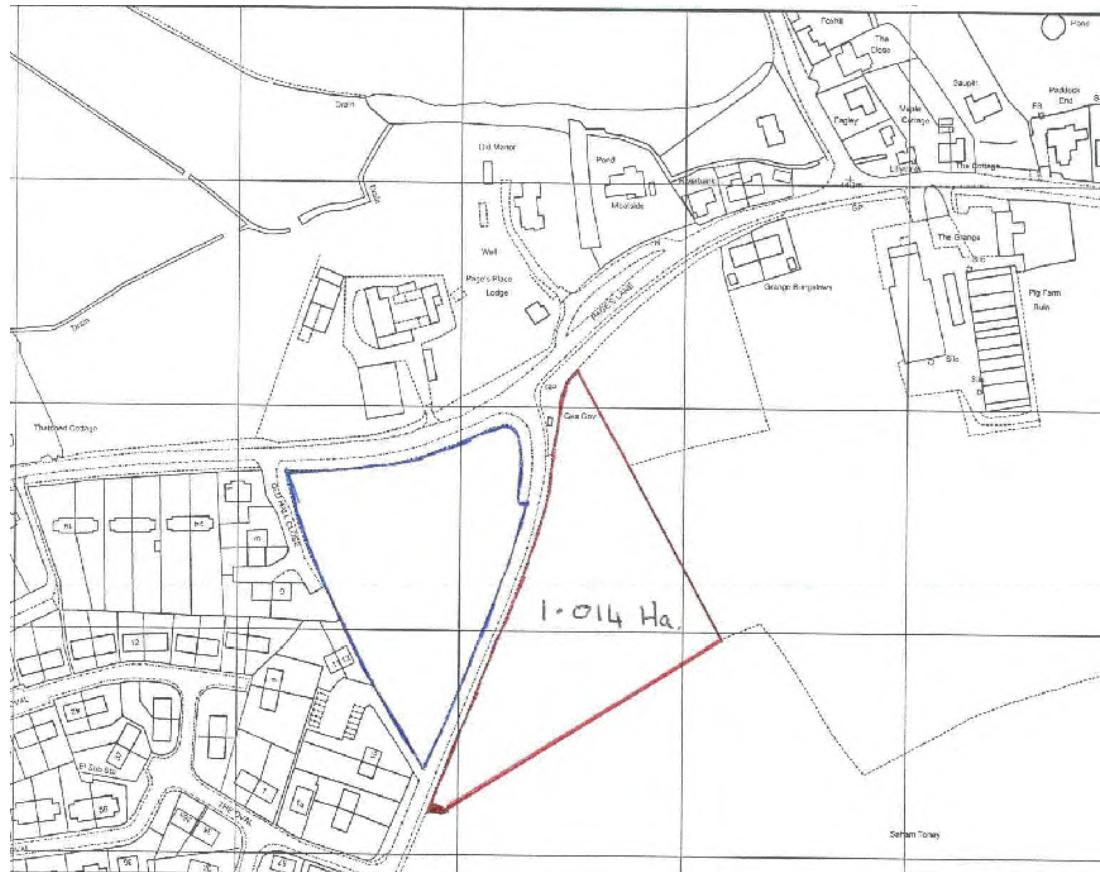
Fig. A4: STNP3 Site Plan

## **STNP4: LAND AT THE JUNCTION OF POUND HILL AND PAGE'S LANE**



**Fig. A5: STNP4 Site Plan**

## STNP5: POUND HILL EAST



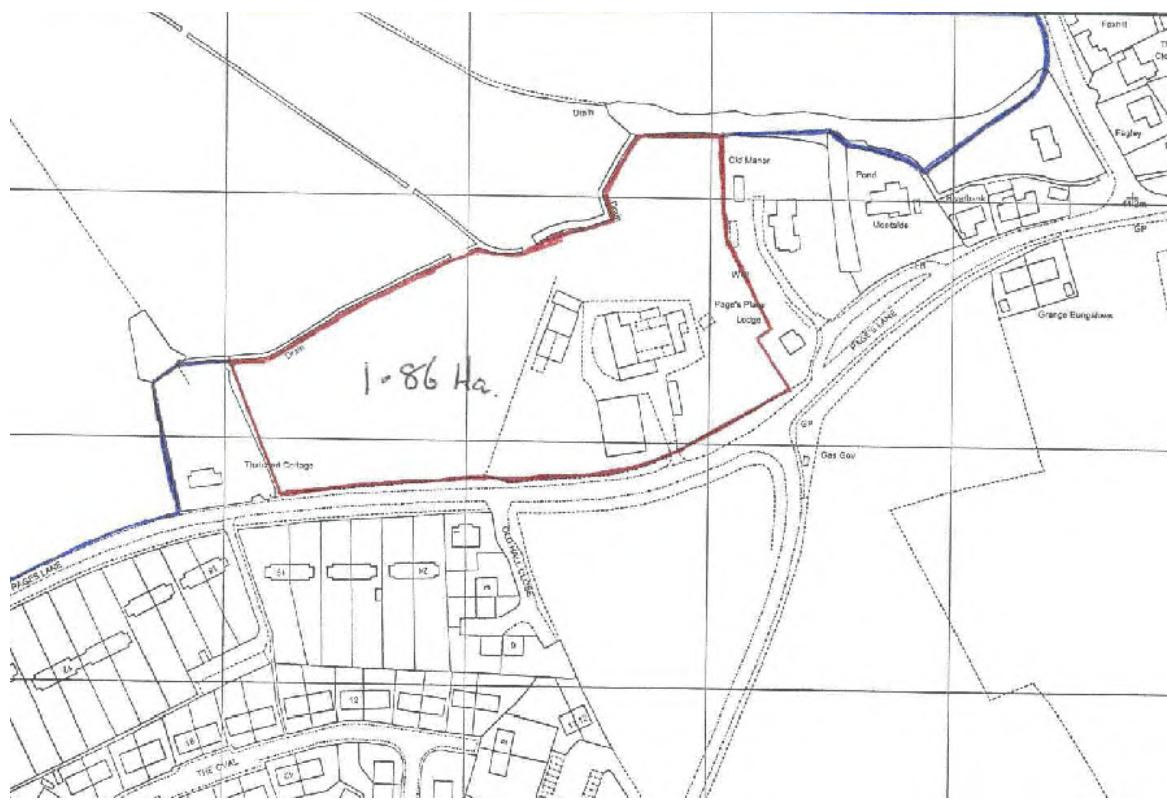
**Fig. A6: STNP5 Site Plan**

**STNP6: PAGE'S LANE EAST, NEAR POUND HILL JUNCTION**



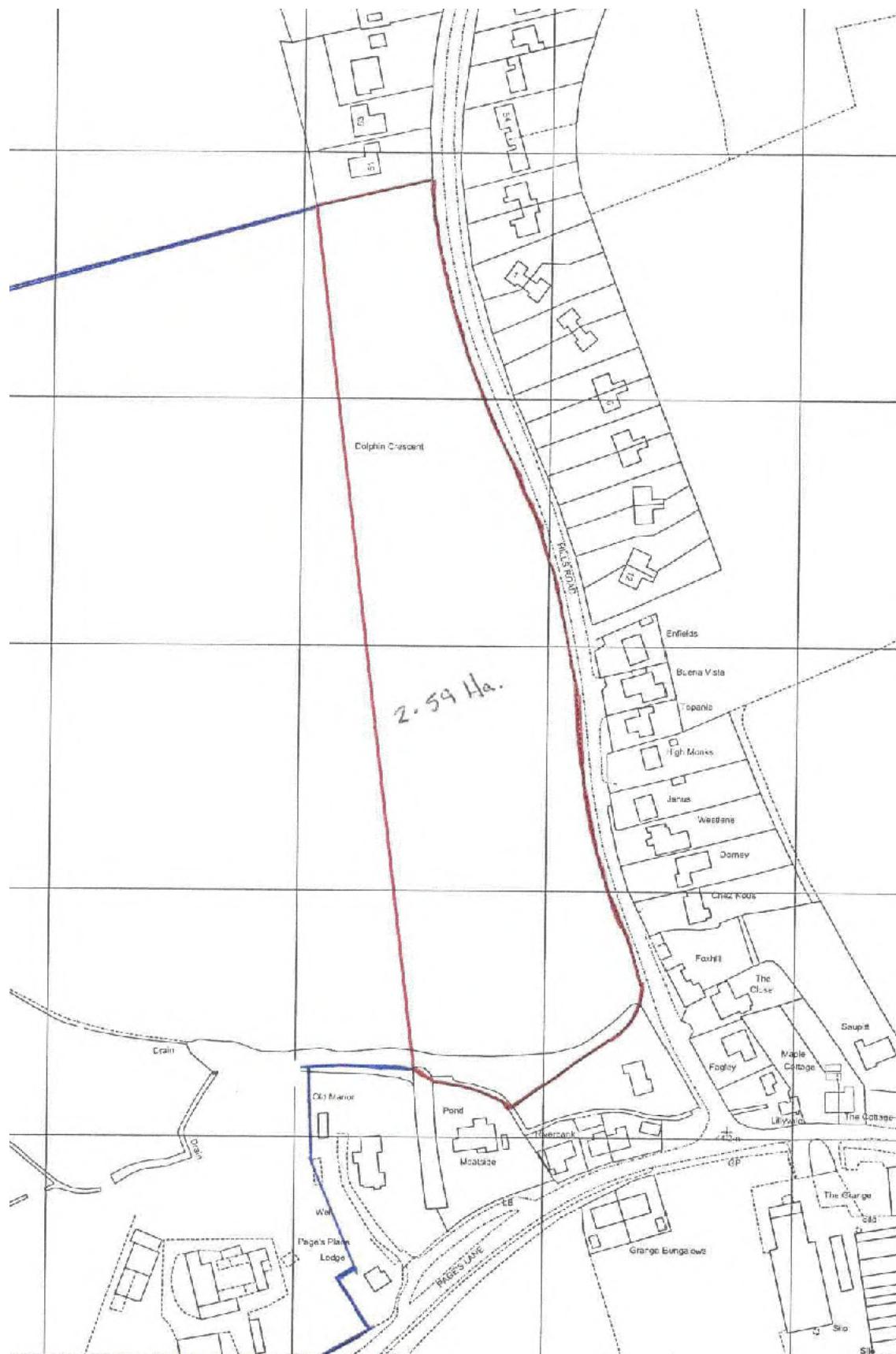
**Fig A7: STNP6 Site Plan**

**STNP7: PAGE'S FARM**



**Fig A8: STNP7 Site Plan**

## STNP8: HILLS ROAD, SOUTH-WEST



**Fig A9: STNP8 Site Plan**



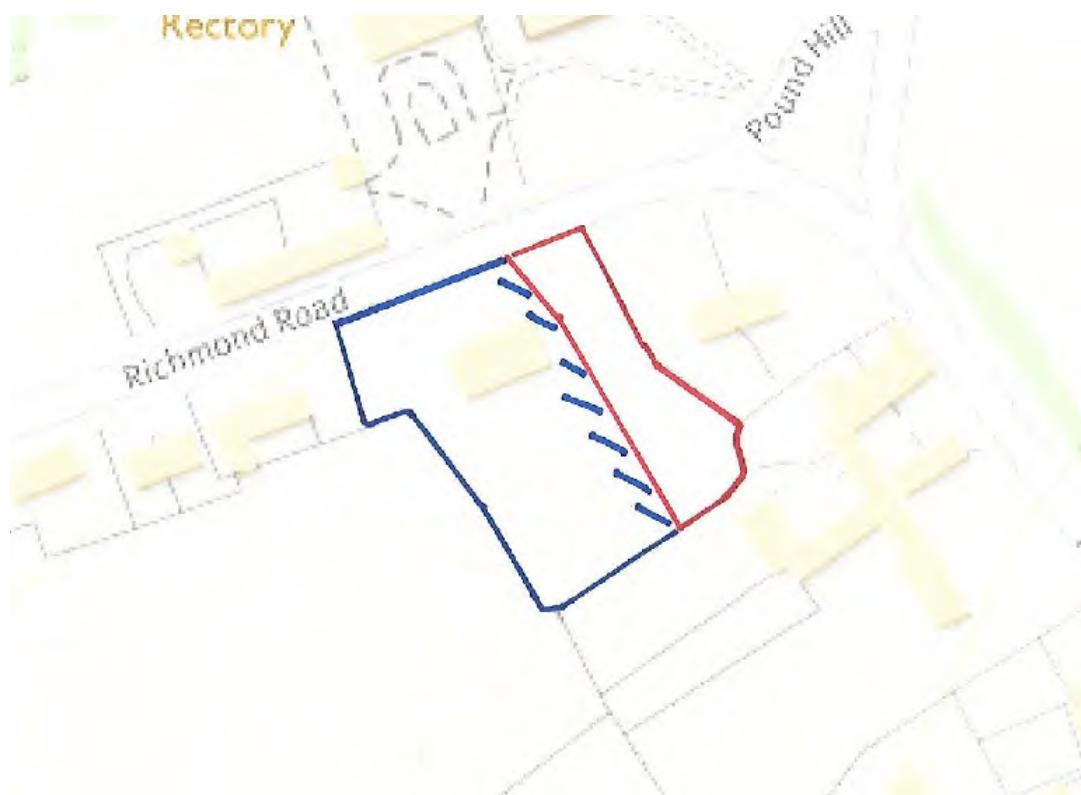
**Fig A10: STNP9 Site Plan And Indicative Layout**

**STNP10: LAND BEHIND 129/131 HILLS ROAD**



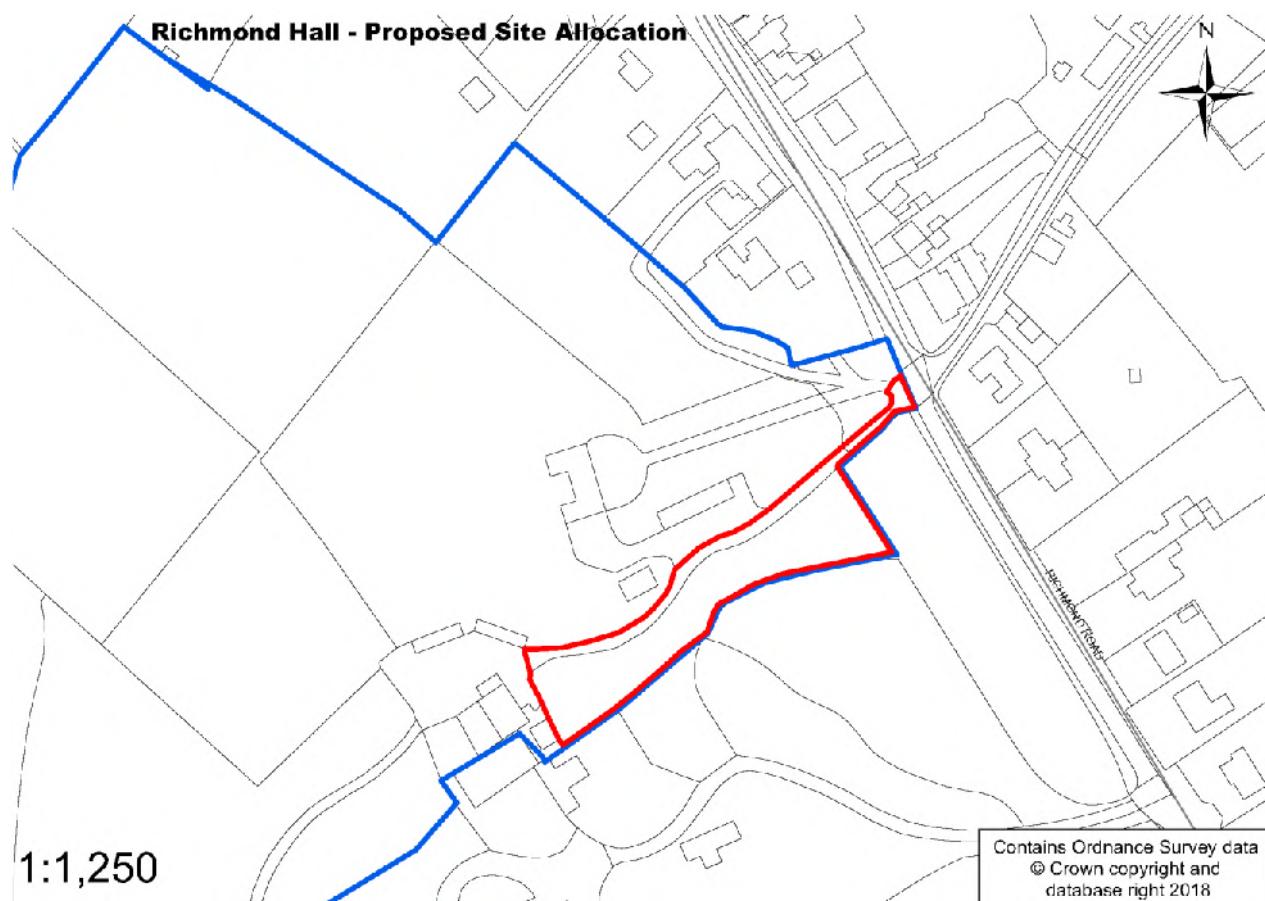
**Fig A11: STNP10 Site Plan**

**STNP11: 8, RICHMOND ROAD (OPTION 1)**



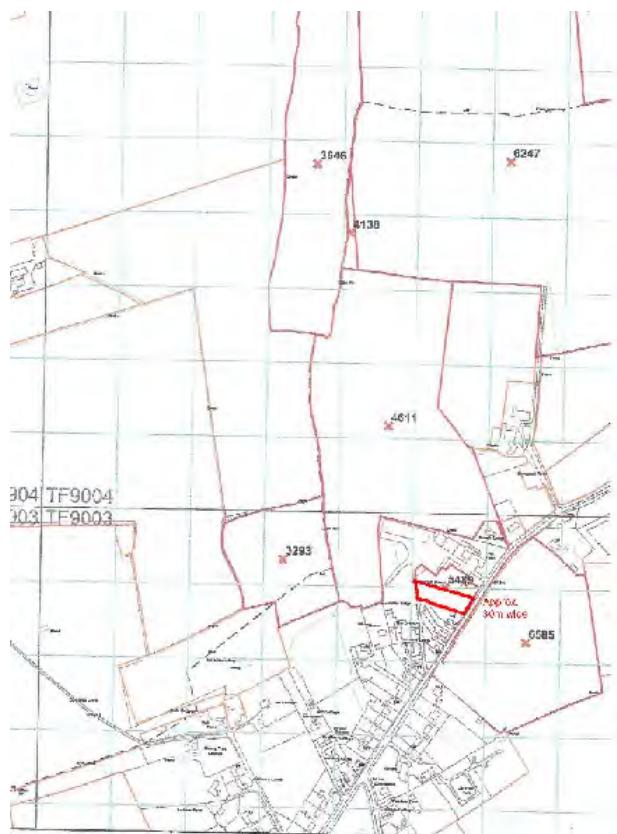
**Fig A12: STNP11 Site Plan**

**STNP12: RICHMOND HALL (OPTION 1)**



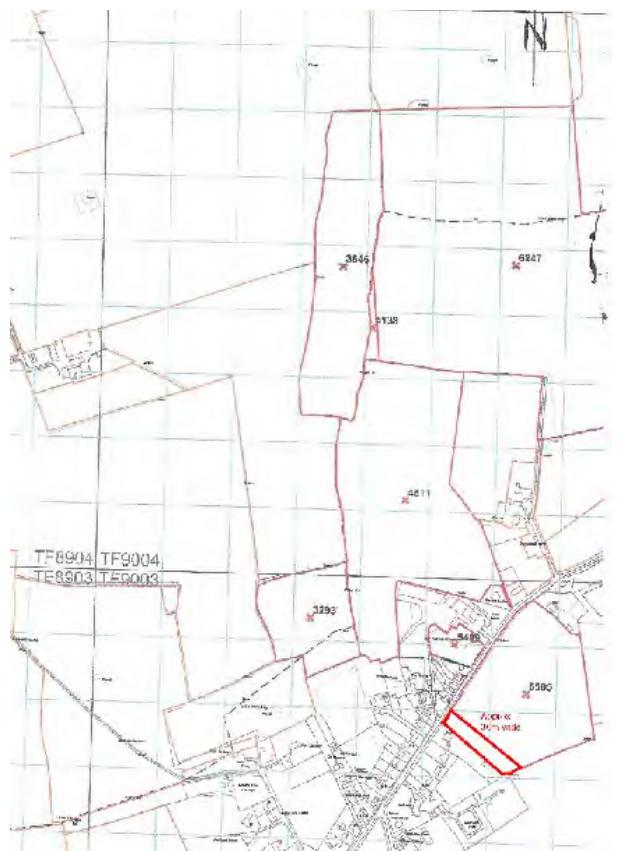
**Fig A13: STNP12 Site Plan**

**STNP13: HILL FARM, HILLS ROAD**



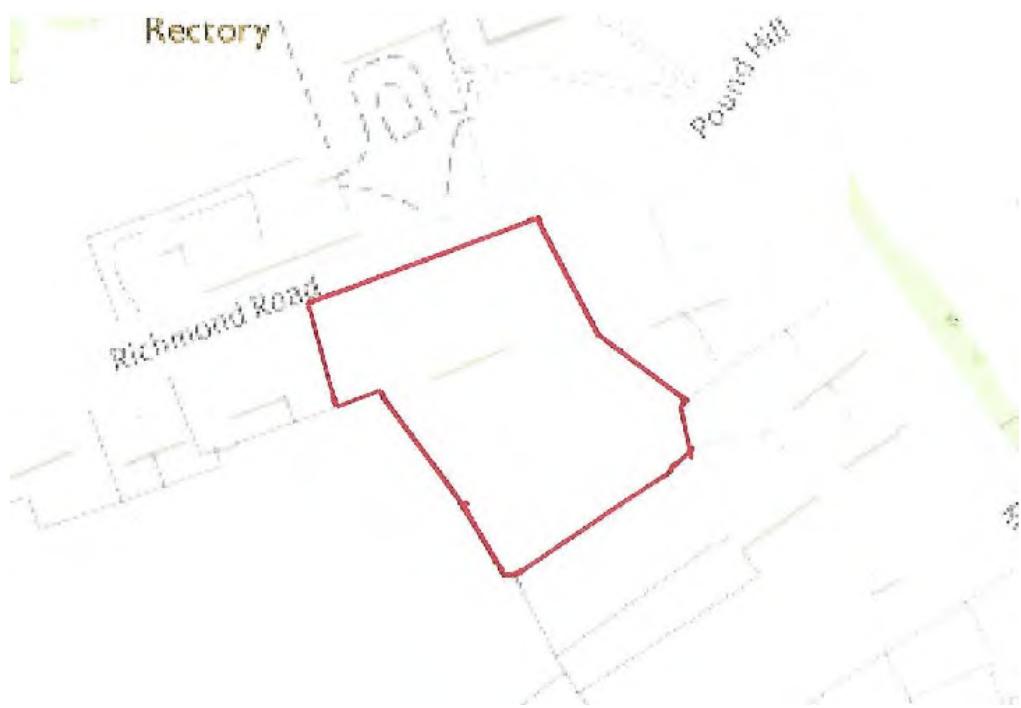
**Fig A14: STNP13 Site Plan**

**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: 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



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

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.

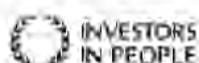
**SHC 24 (Variation)**

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)**

[www.norfolk.gov.uk](http://www.norfolk.gov.uk)



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

*Kay Gordon*

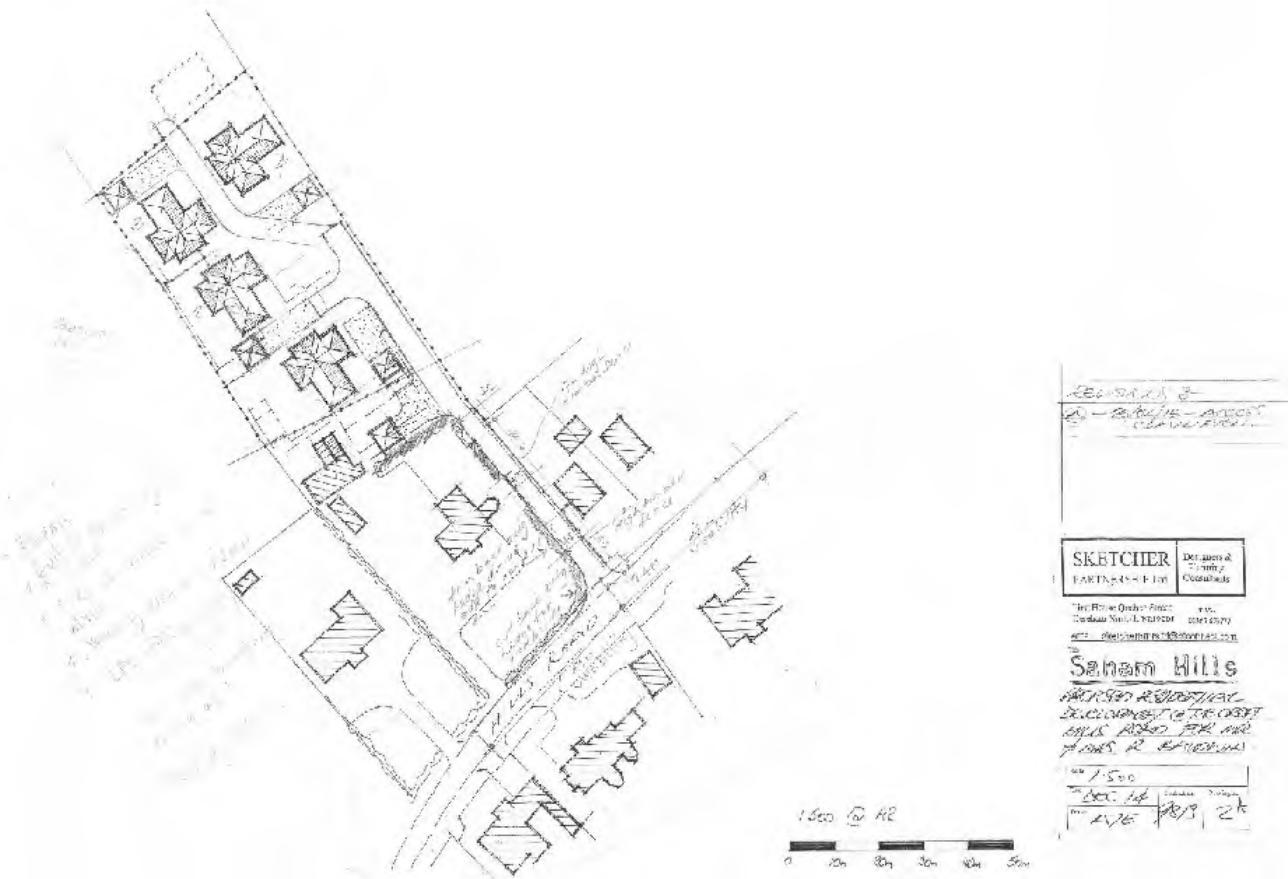
Highways Development Management Officer  
for Executive Director for Community and Environmental Services

[www.norfolk.gov.uk](http://www.norfolk.gov.uk)



**Fig. B2: Local Highway Authority Response to STNP1 Highway Access Proposal**

**B2: STNP2, AECOM highway access constraint**



**Fig B3: STNP2 Highway Access Upgrade Proposal**



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

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



**MRA**  
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](mailto: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.

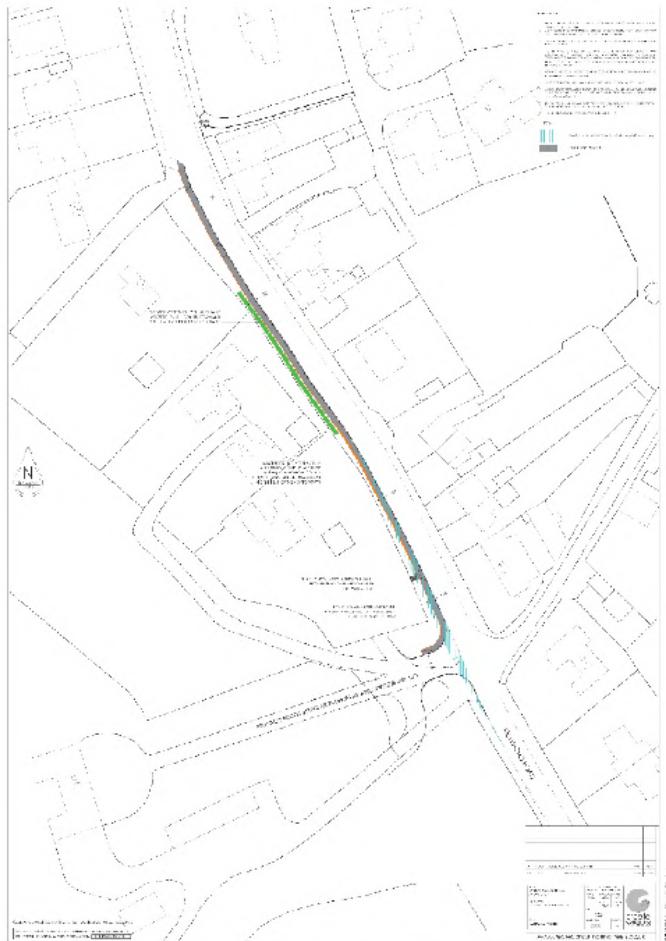
Hope this helps.

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

*Kay Gordon*

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

[www.norfolk.gov.uk](http://www.norfolk.gov.uk)

**Fig. B8: STNP12 Local Highway Authority Correspondence re New Footpath Provision**

# Norfolk County Council at your service

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

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

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

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.

[www.norfolk.gov.uk](http://www.norfolk.gov.uk)



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

*Kay Gordon*

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

[www.norfolk.gov.uk](http://www.norfolk.gov.uk)



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