

Carter Jonas

GNLP Sustainability Assessment Marsham/Fengate Housing Site Assessment Matrix (updated February 2021)

The following table sets out the sites set out in the latest Sustainability Appraisal (SA) and Strategic Environmental Assessment of the Greater Norwich Local Plan report (December 2020, Lepus Consulting). The sites located around Marsham/Fengate are listed in the table in turn, firstly a row indicating the SA's assessments and ranking against the sustainability criteria. Secondly, where we would suggest amendments to the site suitability ranking, a second row has been added below each site a second row labelled 'Suggested Ranking', which indicates how we would suggest that the sites should be ranked. This document includes the latest updates to the SA undertaken by Lepus Consulting for the regulation 19 consultation which are based on 'post mitigation findings'. Finally, a second table has been provided which sets out the SA of draft Local Plan policy GNLP2143 with our comments and suggested rankings.

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February 2021 updates (SA to Regulation 19 consultation with post mitigation findings – page 355)

Our Comments	
15. Water	
14. Natural Resources, Waste	
13. Historic Environment	
12. Transport & Access to Services	
11. Economy	
10. Education	
9. Crime	
8. Health	
7. Deprivation	
6. Population & Communities	
5. Housing	
4. Landscape	
3. Biodiversity, Geodiversity & GI	
2. Climate Change Mitigation	
1. Air Quality and Noise	
Address	
Site No.	

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GNLP3035	Fengate Farm	-	+	-	0	+	+	+	-	+	+	+	-	0	+	-	<p>‘Landscape’ should be assessed as ‘minor positive’. The site does not fall within a designated landscape. The site is well contained within the settlement and comprises a redundant farmyard with fire damaged buildings which presently detracts from the character of the settlement. It does not reflect the defining characteristics of the LCA within which the wider area falls. This is acknowledged in paragraph B.32.4.1 of the SA report (although the site is mistakenly referred to as GNLP2143) but is not reflected in the ranking. Furthermore, a carefully designed development could have the potential to enhance the character of the site and improve public views. The site therefore has the potential to contribute a ‘minor positive’ impact. Evidence of potential for landscape benefits is provided within a Landscape Appraisal document which supports our representations (FPCR, January 2021).</p> <p>‘Health’ should be ranked as ‘minor negative’. The site is close to local public footpaths and opens spaces and it is not close to an AQMA. The SA methodology states that the site must exceed the distance thresholds for all of the stated health facilities in order to score ‘major negative’; however, this site is located close (approx. 200m) from the Velocity gym and Mayhem soft play centre.</p>
GNLP3035 Suggested Ranking		-	+	-	+	+	+	+	-	+	+	+	-	0	+	-	

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GNLP2143	South of Le Neve Road	-	+	-	-	+	+	+	--	+	+	-	0	-	0	<p>'Landscape' should be re-ranked as 'major negative'. Our representations are supported by a landscape appraisal (FPCR, January 2021) which provides an objective and robust assessment, demonstrating there would be a significant harm resulting from development owing to the exposed and open rural nature of the site. Landscape buffers or planting cannot be relied upon as effective mitigation given the time these can take to establish and development would also impede key views and enclose the landscape.</p> <p>'Historic Environment' should certainly score 'major negative'. Our representations are supported by a Heritage Assessment (Orion, January 2021). The SA methodology states that <i>'where a site lies adjacent to a Grade I Listed Building it is assumed that the proposal would also permanently alter the setting to the asset and a major negative impact on the Historic Environment would be expected'</i>. GNLP2143 is located immediately adjacent to and directly in the setting of the grade I listed Church of All Saints, therefore a 'major negative' rather than 'negligible' score should certainly be given. The submitted Heritage Assessment supports this conclusion.</p>
GNLP2143 Suggested Ranking				--					--				--			

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GNLPO229	Land north, east, west and south of Marsham (four sites)	-	--	-	-	++	0	+	--	+	+	+	-	0	-	-	Assessment seems appropriate, no comments
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February 2021 updates (SA to Regulation 19 consultation policy GNLP2143 assessment – pages 373 and 943)

Our Comments	
30. Water	
29. Natural Resources, Waste	
28. Historic Environment	
27. Transport & Access to Services	
26. Economy	
25. Education	
24. Crime	
23. Health	
22. Deprivation	
21. Population & Communities	
20. Housing	
19. Landscape	
18. Biodiversity, Geodiversity & GI	
17. Climate Change Mitigation	
16. Air Quality and Noise	
Address	
Site No.	

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GNLP2143	South of Le Neve Road	-	+	0	-	+	+	+	-	+	+	+	-	0	0	0	<p>'Historic Environment' should be ranked as 'major negative'. The Heritage Assessment supporting our representations concludes there would be significant harm. The site is immediately adjacent to a grade I listed church in addition to being within the setting of several grade II listed buildings. A 'negligible' score is not appropriate given the potential for significant adverse impacts. An important feature of the setting of the Church of All Saints is the wide open countryside within which it is experienced. Any development within this setting would therefore be harmful, regardless of any proposed mitigation measures such as open space and landscape buffers, as it would alter the nature of the setting by introducing built development and urbanisation. Therefore, criterion 3 of policy GNLP2143 will not avoid significant harm from arising as a result of development.</p> <p>'Landscape' should also be ranked as 'major adverse' for the reasons discussed in relation to GNLP2143 in the preceding table.</p>
GNLP3035 Suggested Ranking		-	0	-	--	+	-	0	-	0	-	+	-	--	+	-	