

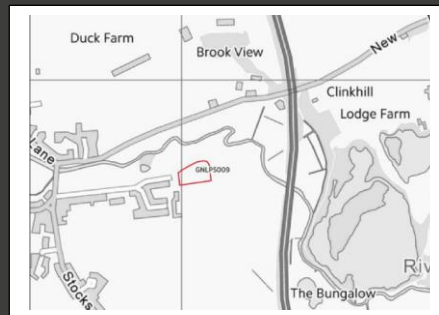
# **GNLP Gypsy & Traveller Sites Focussed Consultation – Supporting Statement**

## **Unsuitability of site GNLP5009 (Hockering Lane, Bawburgh).**

**Prepared for Client:**  
Mark Allison.



[www.parkerplanningservices.co.uk](http://www.parkerplanningservices.co.uk)



**PREPARED BY:** Magnus Magnusson, MRTPI.

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### **Our Offices:**

<b>NORFOLK</b>	T: 01603 516319
<b>SUFFOLK</b>	T: 01284 336348
<b>CAMBRIDGESHIRE:</b>	T: 01223 637283
<b>LINCOLNSHIRE</b>	T: 01780 437333
<b>ESSEX</b>	T: 01245 934184

Norwich	NR20 3LR
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Stamford	PE9 2AE
Chelmsford	CM2 7PX

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<b>Consultation</b>	GNLP Gypsy & Traveller Sites Focussed Consultation.
<b>Local Planning Authority</b>	South Norfolk District Council (SNDC)/Greater Norwich Development Partnership (GNDP).
<b>Client</b>	Mark Allison.
<b>Our Reference</b>	N/A
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## **Contents**

### **1. Introduction**

### **2. Site and Context**

### **3. Unsuitability of site GNLP5009 for allocation in the GNLP**

### **4. GNLP 'Soundness' Issues**

### **5. Concluding Remarks**

## **Appendices**

**Appendix A** – *Extract - Site Assessment Information Statement document (GNLP, January 2023).*

**Appendix B** - *Performance of Site in Respect of SA Objectives.*

## 1.0 Introduction

- 1.1 During the GNLP hearing sessions in February/March 2022 the Planning Inspectors indicated that they would require Gypsy and Traveller (G&T) accommodation needs to be addressed through site allocations in the GNLP and in accordance with the expectations set out in paragraph 68 of the NPPF2021. Paragraph 68 of the NPPF2021 sets out that local plans should include specific deliverable sites for years 1 to 5 of the plan period and developable sites for years 6-10 and where possible years 11-15.
- 1.2 In accordance with these 'expectations', the *GNLP Gypsy & Traveller Sites Focussed Consultation* document responds by considering 10 favoured sites to provide permanent residential pitches for Gypsies and Travellers and 1 reasonable alternative site (see tables 1.1 & 1.2 below).
- 1.3 The July 2021 submission of the GNLP to the Secretary of State stated that a further 64 pitches for Gypsies and Travellers will be required across Greater Norwich by the end of the plan period in 2038. Since then, the Partnership has kept its requirement under review.

Reference	Address	Pitches	Pitches delivered years 1 to 5
GNLP5004	Land off Buxton Road, Eastgate, Cawston	4	4
GNLP5005	Strayground Lane, Wymondham Recycling Centre	2	0
GNLP5009	Hockering Lane, Bawburgh	6	6
GNLP5014	A47 North Burlingham Junction	15	15
GNLP5019	Woodland Stable, Shorthorn Road, Stratton Strawless	4	4
GNLP5020	Romany Meadow, The Turnpike, Carleton Rode	6	6
GNLP5021	The Old Produce Shop, Holt Road, Horsford	6	6
GNLP5022	The Oaks, Foulsham	5	5
GNLP5023	Strayground Lane, Wymondham	10	10
GNLP5024	Upgate Street, Carleton Rode	4	4
<b>Total</b>		<b>62</b>	<b>60</b>

**Table 1.1 - The GNLP's 10 'favoured' sites.**

Reference	Address	Pitches	Pitches delivered years 1 to 5
GNLP5013	Ketteringham Depot	10	0
<b>Total</b>		<b>10</b>	<b>0</b>

**Table 1.2 - The GNLP's single 'Reasonable Alternative' site.**

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- 1.4 According to the consultation document itself, the GNLP is confident that allocations to meet identified needs can be found from its list of favoured and reasonable alternative sites.
- 1.5 The public consultation is an important part of the plan-making process as responses could provide feedback which alters the favoured sites currently identified.
- 1.6 As will be considered within the context of this *Supporting Statement*, my client is objecting to the identification of the site at Hockering Lane, Bawburgh, (ref. GNLP5009) as a 'favoured' site allocation. This *Statement* will consider why this site is particularly unsuitable as an allocation to meet identified Gypsy & Traveller needs in the GNLP period. It is currently being proposed that this site will accommodate 6 pitches to be delivered in years 1-5 (on adoption of the GNLP, see table 1.1 above).

## 2.0 Site and Context

2.1 Site GNLP5009 is a privately owned greenfield site lying to the east of Hockering Lane, Bawburgh. The site, which measures 0.59 ha, is part of an agricultural field that is bounded to the north, east and west by trees and hedges, whilst the remainder of the field is to the south. The site lies adjacent to (immediately to the east of) the settlement boundary of Bawburgh, beyond which there is existing residential development (see fig. 1.1 below).



***Fig. 1.1 – Site GNLP5009 lies outside of the settlement boundary as drawn for Bawburgh.***

### 3.0 Unsuitability of site GNLP5009 for inclusion (allocation) in the GNLP

3.1 The proposed allocation policy for site GNLP5009 appears below (fig. 1.2). This next section of the *Statement* will consider why the site is unsuitable to deliver the policy objectives as identified and will draw on the information that appears in (among other) the *Site Assessment Information Statement* document (GNDP, January 2023, extract as it relates to site GNLP5009 is reproduced at appendix A), and the Sustainability Appraisal (SA, Lepus Consulting, January 2023, extract as it relates to site GNLP5009 is reproduced at appendix B).

**Policy GNLP5009**

**Land off Hockering Lane Bawburgh (0.59 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 6 residential Gypsy and Traveller pitches.**

The development will address the following site-specific matters:

1. Access will be from Hockering Lane via a private road, therefore third-party rights of access will be required.
2. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
3. An archaeological assessment will be required prior to development.
4. Development will be designed to avoid impacts to and from the underground gas pipeline.
5. Pollution mitigation measures are required as the site is within the catchment of groundwater source protection zone (III).
6. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

**Fig. 1.2 – Proposed policy for site GNLP5009.**

#### **i) Site Assessment Information Statement**

3.2 The consultation document itself together with the supporting Site Assessment document (GNDP, Jan. 2023) identify a number of constraints pertaining to site GNLP5009 and that will impact on its ability to deliver

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pitches within the GNLP period.

- 3.3 Access to site GNLP5009 would be via a private road, therefore third-party rights of access would be required. Until site access issues have been resolved, there is no certainty that the site is deliverable within the plan period. As such, the sites allocation would potentially fail the test of local plan 'soundness' (see section 4 below) as it relates to **effectiveness**.
- 3.4 Furthermore, the site assessment document identifies that whilst site GNLP5009 is 200 metres from Bawburgh Primary School, otherwise, facilities are limited and residents would likely need to travel by private vehicle. The nearest shops to the site, for example, are at *Longwater Retail Park* which is 3 kilometres away.
- 3.5 A gas pipeline runs north to south through the western part of site GNLP5009. This is part of the *Cadent Norfolk* network and initial investigations suggest that an easement of 12.2 metres would be required. Until further investigative work is undertaken by the GNLP in tandem with the Health & Safety Executive (HSE) there is no surety that the site will be able to accommodate the desired number of pitches, if any. It would not be a **justified** approach to plan-making to allocate a site that has such issues in respect of deliverability.
- 3.6 Site GNLP5009 is on the southern bank of the River Yare, meaning that there could be some adverse impact on the locally designated *Yare/Tiffey River Valley landscape*. Development would therefore be likely to require mitigation, such as additional tree planting on the site boundaries, to ensure visual impacts on the landscape are minimised.
- 3.7 The site assessment document reveals that an ecological assessment will be required due to there being potential habitats for Great Crested Newts on-site. Again, until the assessment has been provided, there is no surety that the site could be delivered within the plan period and again, this could potentially mean its allocation would fail the test of Plan soundness as it related to a **justified** approach to site selection.
- 3.8 The site is 180 metres east of Bawburgh Conservation Area where the majority of the village's listed buildings are located, and it is possible that



a Historic Impact Assessment (HIA) will be required due to the proximity of the scheduled grade II\* garden buildings at the former Bawburgh Hall to the north-west of the site.

3.9 Further archaeological investigation may also be required as some prehistoric features have been identified on land adjacent to site GNLP5009. Again, until such assessment and investigative work has been undertaken, there is no certainty that the site will be deliverable and again this raises questions as to whether its allocation would be **justified**.

## ii) Performance of Site in Respect of SA/SEA Objectives

Site Reference	SA Objective														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	Air Quality & Noise	Climate Change Mitigation & Adaptation	Biodiversity	Landscape	Housing	Population & Communities	Deprivation	Health	Crime	Education	Economy	Transport	Historic Environment	Natural Resources	Water
GNLP5004	0	+	-	0	+	-	0	--	0	--	+	-	0	-	-
GNLP5005	-	+	--	0	+	-	0	-	0	--	-	-	0	-	-
GNLP5009	0	+	-	-	+	-	0	-	0	-	+	-	-	-	-
GNLP5013	0	+	-	0	+	-	0	-	0	--	-	-	0	+	-
GNLP5014	-	+	+/-	-	+	-	0	--	0	--	+	-	0	-	0
GNLP5019	0	-	-	0	+	-	0	--	0	--	+	--	0	-	0
GNLP5020	0	-	-	0	+	-	0	--	0	--	-	-	0	-	-
GNLP5021	-	+	-	0	+	-	0	--	0	--	+	-	0	-	-
GNLP5022	0	-	-	0	+	-	0	--	0	--	+	-	0	-	-
GNLP5023	-	+	-	-	+	-	0	-	0	--	+	-	0	-	-
GNLP5024	0	-	-	0	+	-	0	--	0	--	-	-	0	-	-

**Table 1.3 – Pre-mitigation impacts of each 'preferred' site on the SA objectives (includes 'reasonable alternative' site GNLP5013).**

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### **SA3: Biodiversity, Geodiversity and Green Infrastructure**

- 3.10 In respect of 'Habitats Sites' the SA reveals that site GNLP5009 is located approximately 3km from the 'River Wensum' SAC and 12.5km from the 'Broadland' SPA/Ramsar and 'The Broads' SAC.
- 3.11 Furthermore, the SA reveals that it is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will need to be identified within the context of the emerging HRA for the proposed Gypsy and Traveller sites.
- 3.12 Until these potential 'impacts' have been further and comprehensively considered and the responsible authorities consulted, it remains unclear as to whether the site will be deliverable within the plan period and its allocation **justified**. Furthermore, site GNLP5009 is located within a Nutrient Impact Area.

### **SA4: Landscape**

- 3.13 As identified above, the proposed development at this site could potentially result in some small-scale loss or degradation of vegetation associated with the river 'corridor' (Yare/Tiffey Rural River Valley), and therefore, have a minor negative impact on the local landscape character (see table 1.3 above).
- 3.14 Site GNLP5009 is located within the outskirts of Bawburgh and the proposed development at this site has the potential to alter views experienced by local residents of surrounding dwellings to some extent, such as those on Hockering Lane. Therefore, a minor negative impact on the local landscape would be expected.
- 3.15 Finally and in respect of 'landscape' site GNLP5009 comprises previously undeveloped land and is located outside of Bawburgh. Therefore, the proposed development at this site could potentially contribute towards the urbanisation of the countryside. As a consequence, a minor negative impact on the local landscape would be expected.

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## **SA6: Population and Communities**

3.16 As identifies above and in respect of 'local services', the nearest local shop to Site GNLP5009 is the Co-op, located approximately 1.7km from the site, outside of the 'sustainable target distance'. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.

## **SA8: Health**

3.17 The SA finds site GNLP5009 lying approximately 1.6km from the closest GP surgery, 'Bowthorpe Health Centre', outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.

3.18 In respect of access to leisure facilities, the closest leisure centre to site GNLP5009 is 'Riverside Leisure Centre', located approximately 7.9km from the site. Site GNLP5009 is located outside of the target distance to this leisure facility, and therefore a minor negative impact on the health and wellbeing of site end users would be expected.

## **SA10: Education**

3.19 In respect of access to a secondary school, site GNLP5009 is located approximately 2.1km from the closest which is Ormiston Victory Academy. Therefore, as the site is located outside of the sustainable target distance to this facility, a minor negative impact on the access of site end users to secondary education would be expected and as determined by the SA.

## **SA12: Transport and Access to Services**

3.20 Site GNLP5009 is located outside the target distances to a bus stop that provides a regular service or a Railway Station. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.

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### **SA13: Historic Environment**

- 3.21 As identified above, site GNLP5009 is located approximately 260m from the Grade II\* Listed Building 'The Slipper Chapel in Garden of Brecon House' and 280m from 'The Hermit's House'. The site is separated from these Listed Buildings by the undeveloped River Yare corridor. The proposed development at this site could potentially alter the setting of these Listed Buildings, and therefore, a minor negative impact on the local historic environment would be expected.
- 3.22 As previously alluded to, site GNLP5009 is located approximately 170m from 'Bawburgh' Conservation Area (CA). The proposed development at this site could potentially alter the setting of this CA to some extent, and as such have a minor negative impact on the local historic environment.
- 3.23 Furthermore, site GNLP5009 is located approximately 280m from 'Two Garden Houses near the Hall' Scheduled Monument (SM), which, again, is across the undeveloped River Yare corridor. The proposed development at this site could potentially have a minor negative impact on the setting of this SM.

### **SA14: Natural Resources, Waste and Contaminated Land**

- 3.24 Site GNLP5009 comprises 0.59ha of previously undeveloped land. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.

### **SA15: Water**

- 3.25 Site GNLP5009 coincides with the outer zone (Zone II) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.

3.26 Further, site GNLP5009 is located within 200m of the River Yare watercourse. The proposed development at this site could potentially increase the risk of contamination of this watercourse, and therefore, a minor negative impact would be expected.

## **4.0 GNLP 'Soundness' Issues**

4.1 Not only are the constraints and potential impacts arising from the allocation of site GNLP5009 and as identified within section 3 of this *Statement* concerning, they have the ability to undermine the fundamental tests of 'soundness' (NPPF 2021, para. 35) of the local plan-making/GNLP process and on the following grounds:

**a) Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs...

*Given the constraints and impacts identified, there remain 'question marks' in respect of site deliverability within the plan-period. Consequently, allocating the site could result in a shortfall in pitch provision compared to identified need(s).*

**b) Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence...

*Allocating site GNLP5009 is not an appropriate 'strategy' given the constraints and impacts identified. It would be more appropriate to consider less constrained sites for allocation within the context of the emerging GNLP.*

**c) Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground...

*Site GNLP5009 is potentially undeliverable within the plan-period as a consequence of the 'constraints' and 'impacts' pertaining to it and as identified within the context of the Statement. The allocation of site GNLP5009 would potentially, therefore, be 'ineffective'.*

**d) Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

*Allocation of site GNLP5009 is potentially an unsustainable option for the GNLP. The allocation would relate poorly to the 3 dimensions of sustainable development as espoused by the Framework (economic, social and environmental) and not least on the grounds of potential impact on the historic environment, landscape, watercourses, conservation area, lack of appropriate site access, lack of access to key services & facilities and biodiversity.*

## **5.0 Concluding Remarks**

- 5.1 For the reasons outlined within this Statement, it is considered that site GNLP5009 (Hockering Lane, Bawburgh) is wholly unsuitable for inclusion (allocation) within the context of the emerging GNLP. An alternative site or sites ought to be sought, the reserve site potentially utilised and or an uplift in pitch numbers on one or more of the other sites proposed to accommodate the needs of the gypsy & traveller community ought to be considered.
- 5.2 It has been considered within section 3 that there are a host of potential constraints and impacts pertaining to site GNLP5009, a number of which are potential 'showstoppers' in terms of assessing the deliverability of a site to come forward within the plan-period. These constraints and impacts raise fundamental questions in terms of plan 'soundness' as it relates to the allocation of site GNLP5009 specifically and as considered within section 4 of this *Statement*.
- 5.3 Parker Planning Services would like to be kept up to date with the progress of the GNLP and reserve the right to participate in any forthcoming Examination Hearings. For further information, or to discuss, please contact Magnus Magnusson on 01284 336119 or e-mail [magnus@parkerplanningservices.co.uk](mailto:magnus@parkerplanningservices.co.uk).

## Appendix A – Extract - Site Assessment Information Statement document (GNDP, January 2023)

### Parish: Bawburgh Suitability Assessment

<b>Site reference:</b> GNLP5009	<b>Site area:</b> 0.59 ha
<b>LOCATION:</b> Land off Hockering Lane, Bawburgh	<b>PROPOSED DEVELOPMENT:</b> A permanent residential Gypsy and Travellers site for 6 pitches
<b>District:</b> South Norfolk	

#### CONSTRAINTS ANALYSIS

Site Access	Amber
Accessibility to Services	Amber
Utilities Capacity	Green
Utilities Infrastructure	Amber
Contamination and Ground Stability	Amber
Flood Risk	Green
Market Attractiveness	Green

#### IMPACTS ANALYSIS

Significant Landscapes	Amber
Sensitive Townscapes	Green
Biodiversity and Geodiversity	Green
Historic Environment	Amber
Open Space and GI	Green
Transport and Roads	Green
Compatibility with neighbouring Uses	Green

#### SITE SUITABILITY CONCLUSIONS

42. GNLP5009 is a proposal for 6 pitches on a greenfield site to the east of Hockering Lane in Bawburgh. The site, which measures 0.59 ha, is part of an agricultural field that is bounded to the north, east and west by trees and hedges, with the remainder of the field to the south.
43. Access to GNLP5009 would be via a private road, therefore third-party rights of access would be required. GNLP5009 is 200 metres from Bawburgh Primary School, but otherwise facilities are limited and residents would likely need to travel by private vehicle, for example the nearest shops are at Longwater Retail Park 3 kilometres away.
44. A gas pipeline runs north to south through the western part of the site. This is part of the Cadent Norfolk network and initial investigations suggest that an easement of 12.2 metres would be required. This is likely to dictate that



the majority of pitches would be positioned towards the central and eastern part of the site.

45. GNLP5009 is on the southern bank of the River Yare, meaning that there could be some adverse impact on the locally designated Yare/Tiffey River Valley landscape. Development would therefore be likely to require mitigation, such as additional tree planting on the site boundaries, to ensure visual impacts on the landscape are minimised.

46. There are no statutory designated environmental sites immediately affecting GNLP5009. The nearest is Bawburgh/Colney Gravel Pits County Wildlife Site and candidate County Geodiversity site which is 290 metres to the east of the site on the opposite side of the A47. The River Wensum SSSI and SAC is 3 kilometres to the north at its closest point to GNLP5009 and the Sweetbriar Road Meadows SSSI is 4.6 kilometres away to the east. However, an ecological assessment will be required due to there being potential habitats for Great Crested Newts on-site.

47. The site is 180 metres east of Bawburgh Conservation Area where the majority of the village's listed buildings are located, and it is possible that a Historic Impact Assessment (HIA) will be required due to the proximity of the scheduled grade II\* garden buildings at the former Bawburgh Hall to the north-west of the site. Archaeological investigation may be required as some prehistoric features have been identified on land adjacent to GNLP5009.

48. The site is in flood zone 1, so is at low risk of river flooding and is not at risk of surface water flooding. However, the site is within the catchment of a groundwater Source Protection Zone (Zone III). As such, pollution mitigation measures for water quality protection will be required, but this does not rule out development potential.

49. There are no issues over the loss of designated open space and the site is on relatively low-quality agricultural land (Grade 4). Whilst the site is less than 300 metres from the A47, noise impacts could be mitigated.

50. As with many locations in Greater Norwich, mitigation of the impacts on nutrient levels in river catchments will be required.

51. The site is in private ownership and the landowner is willing to make it available as a Gypsy and Traveller site. Although there are some constraints, most particularly the gas pipeline passing under the site and the possible adverse impact on the adjacent River Yare landscape, there is no reason why development with mitigation could not come forward quickly. 4 to 5 years is considered ample time to market the land, gain planning permission, and to develop the site.

### Overall Conclusions for the Site

14

52. Subject to the caveats identified above, GNLP5009 is considered suitable as a favoured option for allocation. If allocated in the local plan, GNLP5009 would be deliverable within 5 years and could be completed by March 2027.



## Appendix B - Performance of Site in Respect of SA Objectives

**Source:** Sustainability Appraisal of the Greater Norwich Local Plan Gypsy and Traveller Sites and Policies. Addendum to the Regulation 19 SA Report, Lepus Consulting, January 2023.

**See also table 1.3 (above)**

<b>SA1: Air Quality and Noise</b>	
3.4.1	<b>Air and Noise Pollution:</b> Site GNLP5009 is proposed for small-scale development (six Gypsy and Traveller pitches), and is situated away from major sources of air and noise pollution. A negligible impact on local air quality and noise would be expected.
<b>SA2: Climate Change Mitigation and Adaptation</b>	
3.4.2	<b>Fluvial Flooding:</b> Site GNLP5009 is located wholly within Flood Zone 1. Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.
<b>SA3: Biodiversity, Geodiversity and Green Infrastructure</b>	
3.4.3	<b>Habitats Sites:</b> Site GNLP5009 is located approximately 3km from 'River Wensum' SAC and 12.5km from 'Broadland' SPA/Ramsar and 'The Broads' SAC. It is uncertain at this stage whether development of the site would be likely to impact these Habitats sites, and any potential impacts will be identified within the emerging HRA for the proposed Gypsy and Traveller sites.
3.4.4	<b>SSSI IRZ:</b> Site GNLP5009 is located within a Nutrient Impact Area, within an IRZ which states that "for new development with overnight accommodation Reg 63 of the Conservation of Habitats and Species Regulations 2017 must be applied and additional measures required. LPA to refer to Natural England's Nutrient Neutrality advice". A minor negative impact on the features for which nearby SSSIs have been designated could potentially occur as a result of the proposed development at this site.
<b>SA4: Landscape</b>	
3.4.5	<b>Landscape Character:</b> Site GNLP5009 is located within the LCA 'Yare/Tiffey Rural River Valley'. Some key characteristics of this LCA include vegetated valley floor, meandering rivers, pastoral land use, small woodland blocks, and small attractive villages. Site GNLP5009 comprises an area of arable farmland and hedgerow/trees outside of the existing settlement of Bawburgh, in close proximity to the River Yare. The proposed development at this site could potentially result in some small-scale loss or degradation of vegetation associated with the river corridor, and therefore, have a minor negative impact on the local landscape character.
3.4.6	<b>Views for Local Residents:</b> Site GNLP5009 is located within the outskirts of Bawburgh and the proposed development at this site has the potential to alter views experienced by local residents of surrounding dwellings to some extent, such as those on Hockering Lane. Therefore, a minor negative impact on the local landscape would be expected.
3.4.7	<b>Urbanisation of the Countryside:</b> Site GNLP5009 comprises previously undeveloped land and is located outside of Bawburgh. Therefore, the proposed development at this site could potentially contribute towards the urbanisation of the countryside. A minor negative impact on the local landscape would be expected.

### SA5: Housing

- 3.4.8 **Provision of Pitches:** Site GNLP5009 is proposed for the development of six Gypsy and Traveller pitches. Therefore, the proposed development at this site would be expected to have a minor positive impact by helping to satisfy the identified accommodation needs in the Plan area.

### SA6: Population and Communities

- 3.4.9 **Local Services:** The nearest local shop to Site GNLP5009 is Co-op, located approximately 1.7km from the site, outside of the sustainable target distance. Therefore, the proposed development at this site could potentially have a minor negative impact on the access of site end users to local services.
- 3.4.10 **Local Landscape Designations:** Site GNLP5009 is located within 600m from Bawburgh Allotments, Village Green and amenity open space at Harts Land and New Road. The proposed development at this site would therefore be likely to provide site end users with good access to these assets, and as such, result in a minor positive impact on opportunities for integration with the local community.

### SA7: Deprivation

- 3.4.11 See Table 2.4, 'SA7: Deprivation'.

### SA8: Health

- 3.4.12 **NHS Hospital:** The closest hospital with an A&E department to Site GNLP5009 is Norfolk and Norwich University Hospital, located approximately 2.6km from the site, within the sustainable target distance. The proposed development at Site GNLP5009 would be expected to provide site end users with good access to this healthcare facility and therefore a minor positive impact would be expected.
- 3.4.13 **GP Surgery:** Site GNLP5009 is located approximately 1.6km from the closest GP surgery, 'Bowthorpe Health Centre', outside of the sustainable target distance. The proposed development at this site could potentially restrict the access of site end users to healthcare facilities and therefore a minor negative impact could be expected.
- 3.4.14 **Leisure Facilities:** The closest leisure centre to Site GNLP5009 is 'Riverside Leisure Centre', located approximately 7.9km from the site. Site GNLP5009 is located outside of the target distance to this leisure facility, and therefore a minor negative impact on the health and wellbeing of site end users would be expected.
- 3.4.15 **Main Road:** Site GNLP5009 is located over 200m from a main road. The proposed development at this site would be expected to have a minor positive impact on health, as site end users would be located away from main roads and associated air pollution.
- 3.4.16 **Green Network:** Site GNLP5009 is located within 600m from an open greenspace (play space). Therefore, a minor positive impact would be expected at this site, as the proposed development would be likely to provide site end users good access to outdoor space and a diverse range of natural and semi-natural habitats, which is known to have physical and mental health benefits.

### SA9: Crime

- 3.4.17 See Table 2.4, 'SA9: Crime'.

### SA10: Education

- 3.4.18 **Primary School:** Site GNLP5009 is located approximately 200m from The Bawburgh School, within the sustainable target distance. Therefore, a minor positive impact on the access of site end users to primary education would be expected.
- 3.4.19 **Secondary School:** Site GNLP5009 is located approximately 2.1km from the closest secondary school, Ormiston Victory Academy. Therefore, as the site is located outside of the sustainable target distance to this facility, a minor negative impact on the access of site end users to secondary education would be expected.

### SA11: Economy

- 3.4.20 **Primary Employment Location:** Site GNLP5009 is located approximately 1.8km from Bowthorpe Employment Area in the outskirts of Norwich City, which would be expected to provide a range of employment opportunities for site end users and is within the sustainable target distance. Therefore, a minor positive impact on the local economy would be expected.

### SA12: Transport and Access to Services

- 3.4.21 **Bus Stop:** Site GNLP5009 is located outside the target distance to a bus stop that provides a regular service. Therefore, the proposed development at this site would be expected to result in a minor negative impact on site end users' access to these services.
- 3.4.22 **Railway Station:** Site GNLP5009 is located outside the target distance to a railway station, with the nearest being Norwich Railway Station situated over 7km to the east. The proposed development at this site would be likely to have a minor negative impact on the access of site end users to rail services.
- 3.4.23 **Pedestrian Access:** Site GNLP5009 is well connected to the existing footpath network, via pavement. The proposed development at this site would be expected to have a minor positive impact on the access of site end users to the site and surrounding areas.
- 3.4.24 **Road Network:** Site GNLP5009 is well connected to the existing road network. The proposed development would therefore be expected to provide site end users with good access to existing roads, resulting in a minor positive impact on local accessibility.

### SA13: Historic Environment

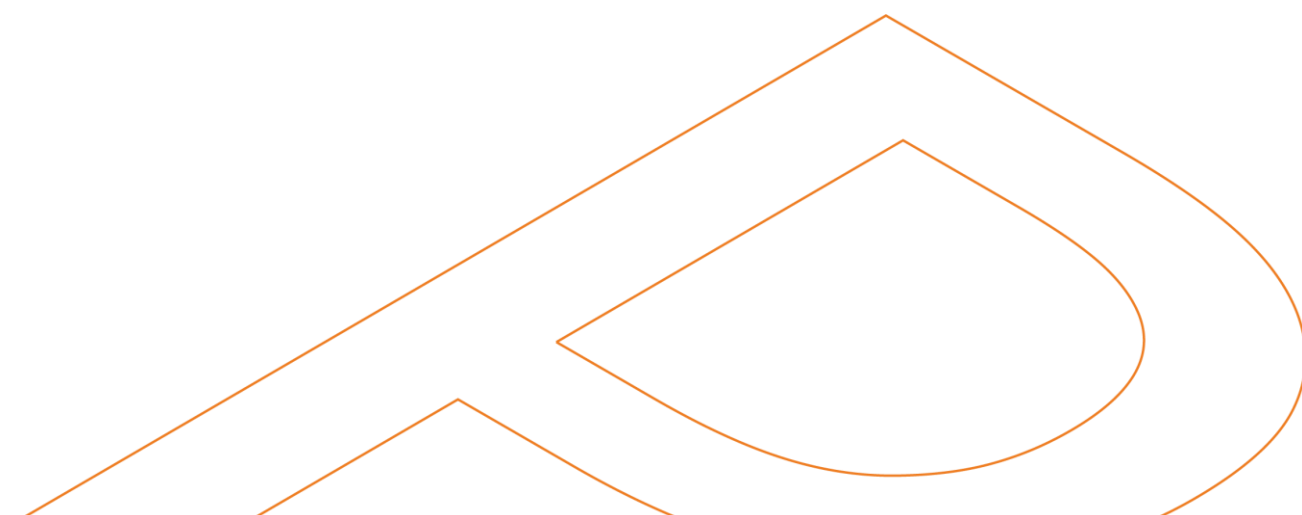
- 3.4.25 **Grade II\* Listed Building:** Site GNLP5009 is located approximately 260m from the Grade II\* Listed Building 'The Slipper Chapel in Garden of Brecon House' and 280m from 'The Hermit's House'. The site is separated from these Listed Buildings by the undeveloped River Yare corridor. The proposed development at this site could potentially alter the setting of these Listed Buildings, and therefore, a minor negative impact on the local historic environment would be expected.
- 3.4.26 **Conservation Area:** Site GNLP5009 is located approximately 170m from 'Bawburgh' CA. The proposed development at this site could potentially alter the setting of this CA to some extent, and as such have a minor negative impact on the local historic environment.
- 3.4.27 **Scheduled Monument:** Site GNLP5009 is located approximately 280m from 'Two Garden Houses near the Hall' SM, across the undeveloped River Yare corridor. The proposed development at this site could potentially have a minor negative impact on the setting of this SM.

### SA14: Natural Resources, Waste and Contaminated Land

- 3.4.28 **Previously Developed Land:** Site GNLP5009 is located upon 0.59ha of previously undeveloped land. Therefore, the development of this site could have a minor negative impact on natural resources due to the loss of less than 20ha of previously undeveloped land. This negative impact would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- 3.4.29 **ALC:** Site GNLP5009 is situated upon ALC Grade 4, which is considered to be poor quality agricultural land. Therefore, a minor positive impact on natural resources could be expected as development would help to prevent the loss of BMV land across the Plan area.

### SA15: Water

- 3.4.30 **SPZ:** Site GNLP5009 coincides with the outer zone (Zone II) of a groundwater SPZ. The proposed development at this site could potentially increase water contamination within this SPZ, resulting in a potential minor negative impact on local groundwater resources.
- 3.4.31 **Watercourse:** Site GNLP5009 is located within 200m of the River Yare. The proposed development at this site could potentially increase the risk of contamination of this watercourse, and therefore, a minor negative impact would be expected.



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