

Norwich Over the Wensum Neighbourhood Plan SEA & HRA Final Screening Report Prepared by Norwich City Council February 2025

1. Introduction

- 1.1 The Norwich Over the Wensum (NOW) neighbourhood forum are working to prepare a neighbourhood plan (henceforth referred to NOWNP). The planning period for the NOWNP will be the date it is made up to the end of 2035.
- 1.2 This report has been prepared to determine whether the NOWNP is likely to have significant environmental effects, and therefore whether it requires a full Strategic Environmental Assessment and an Appropriate Assessment under the Habitat Regulations.
- 1.3 This report is structured as follows: An introduction to the neighbourhood area and plan, SEA screening opinion and conclusions, HRA screening opinion and conclusions, overall conclusions and next steps.
- 1.4 A consultation will take place with statutory bodies and their conclusions will be reflected in the final report.

2. Introduction to the Norwich Over the Wensum Neighbourhood Area

- 2.1 The neighbourhood area is located in the northern part of Norwich City Centre. The area was formally designated in 2018 along with designation of the neighbourhood forum in 2020. The area is bounded by the River Wensum on the western and southern boundaries and follows local roads to the north and east boundaries. St Crispin's Road, including the flyover Magdalen Street, and two major roundabouts of the inner ring road cross the centre of the area east to west (Figure 1).

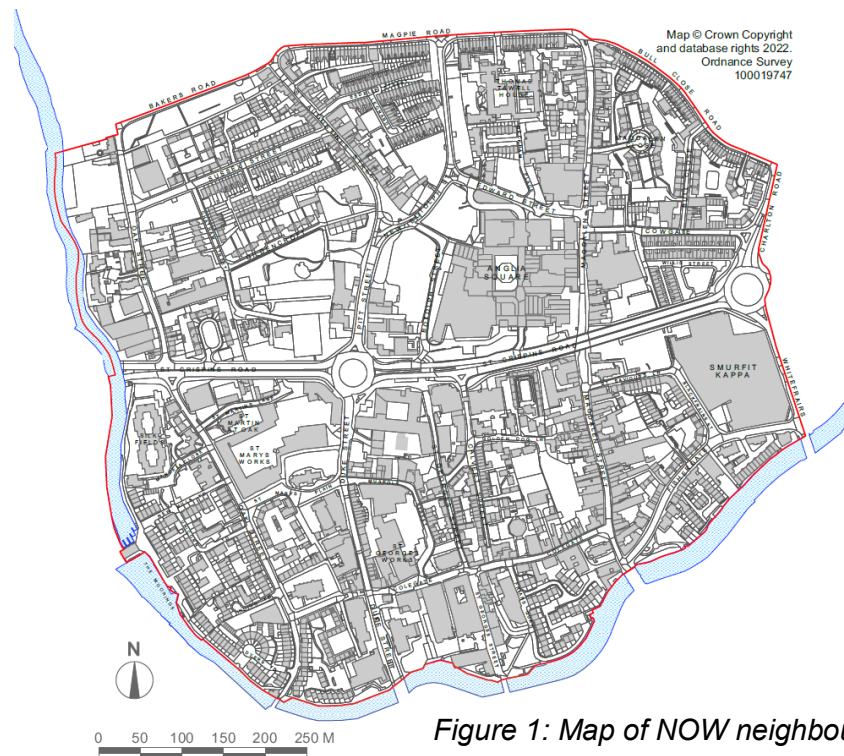


Figure 1: Map of NOW neighbourhood area

2.2 This section summarises some of the key baseline information relevant to the NOWNP area and its surrounding context:

Biodiversity, flora and fauna

The neighbourhood area is bisected so that the Western half is located within the impact risk zone for a SSSI (Site of Special Scientific Interest) (Sweet Briar Meadows)¹. Other parts of the area fall within impact risk zones of both the Catton Chalk Pit and St James' Pit SSSIs. To the West of the area is the River Wensum (Special Area of Conservation) [SAC](#), and to the East further downstream, is the Broadland (Special Protection Area) [SPA](#), SAC, [Ramsar site](#) and Priority Wetland areas. The Broads Authority National Park area includes the river Wensum up to New Mills and borders the South and part of the Western boundary of the neighbourhood area. There are also numerous [Local Nature Reserves](#) (Mousehold Heath and Mile Cross Marsh) and well as [County Wildlife Sites](#) (Train Wood) within varying degrees of proximity. The area falls within multiple Zones of Influence for recreational impacts at the protected sites².

The area itself has low to moderate species richness with regard to [red list](#) and European Protected Species ([Schedule 2 and 5](#)). The area is located within the River Corridor and Historic Habitat Biodiversity Character Areas, and whilst the biodiversity hotspot scores are relatively low within the area, further reaches of the Wensum in the City (both up and downstream) score highly³.

Population

The neighbourhood area does not follow an existing administrative boundary and crosses a number of geographical areas used for measuring population statistics. [Indices of Multiple Deprivation](#) (IMD) deciles are measured at [Lower Super Output Area](#) (LSOA) scale across the country, and the neighbourhood area crosses two of these LSOAs. The IMD score for the northern part of the neighbourhood area is 1 (i.e. top 10% most deprived areas), and for the southern part the score is 4 (i.e. top 40% most deprived areas)⁴.

Human health

The majority of human health indicators are also measured using LSOAs. The majority of the population in the relevant LSOAs are considered to be of fair to very good health (93.1% in southern LSOA and 90.4% in the northern LSOA) compared with those considered to be of bad to very bad health. There are two medical practices (Castle Partnership Surgery and Oak Street Medical Practice) within the neighbourhood area⁵.

Soil

The neighbourhood area is largely situated on chalk bedrock with alluvium superficial deposits as a result of its proximity to the Wensum river corridor. There are various backfilled chalk mines across the city, although none are located within the neighbourhood area⁶. There are multiple sites within the neighbourhood area identified as being potentially contaminated sites and adjacent areas identified as [contaminated sites](#) under Part 2A of the Environmental Protection Act 1990.

Water

The River Wensum is a chalk stream that runs along the Western and Southern boundaries of the area, and the section that flows within Norwich City is classed as 'heavily modified'. There are significant proportions of the neighbourhood area that fall within flood zones 2 and 3 with a high probability of flooding from rivers and seas⁷. The risk of groundwater flooding in the area is unlikely. There are multiple areas, particularly along the road network, that are at risk from surface water flooding (to varying degrees) and the whole area falls within the Catton Grove and Sewell Critical Drainage Area^{8&9}.

The neighbourhood area is also subject to a number of water quality considerations. The area is located within a nitrate vulnerable zone, is sensitive to ammonia pollution, is in a drinking water protected area, drinking water safeguard zone and a groundwater source protection zone¹⁰. The whole area is subject to nutrient neutrality restrictions¹¹.

The Whitlingham Water Recycling centre is one of the locations which has been identified as not having sufficient capacity to treat additional waste waters from unplanned development¹². The wider area is classified as a 'water stressed area' but that there is sufficient water supply available for the planned level of growth up to 2045¹³.

Air and climatic factors

The neighbourhood area is in relatively close proximity to the central Norwich [Air Quality Management Area](#) (AQMA) which was declared in 2012 for annual mean nitrogen dioxide levels from road transport sources¹⁴. There is also a nearby smoke control area within the city centre¹⁵.

East Anglia as a region, is expected to suffer from reduced rainfall, increased temperatures and more extreme weather events from climate change¹⁶.

Material assets/constraints

At the centre of the neighbourhood area is the Anglia Square strategic site allocation. In the adopted Greater Norwich Local Plan (GNLP) this site is allocated for in the region of 800 homes with additional commercial floorspace. There is an extant planning permission for 1,200 homes, commercial floorspace and parking for the site¹⁷. There are a number of smaller brownfield site allocations also located within the neighbourhood area¹⁸.

The Anglia Square site, along with sections of the surrounding areas at Magdalen Street and St Augustine's Street, are designated as a Large District Centre. There is also a local retail centre at St Augustine's Gate (northern boundary of the area) and the city centre retail area to the south¹⁹. Various sites across the neighbourhood area (and the rest of the city) are subject to an Article 4 Direction which removes permitted development rights allowing conversion from offices to residential spaces, as these are considered to be prime office floorspace locations²⁰.

Route #1 of the National Cycle Network passes through the neighbourhood area from East to West¹⁰. There are both existing and proposed sections of Riverside Walk along the Wensum. The whole of Norwich is covered by the Norwich Airport Aerodrome Safeguarding Zone¹⁹.

Cultural heritage

The neighbourhood area is located in a historically rich part of the city; there are a significant number of scheduled ancient monuments (e.g. city walls), statutory and locally listed buildings, historic city gateways, and registered and unregistered historic parks and gardens (e.g. Gildencroft Park). The whole area is covered by an area of main archaeological interest as well as the city centre conservation area. There are several buildings within the neighbourhood area, or visible within, that are considered either national or local heritage at risk as they are in poor condition (e.g. St Martin at Oak Church)¹⁹.

Landscape

The majority of the neighbourhood area falls within the boundary of National Character Area 78 (central north Norfolk)²¹. Outside of the city, the NCA is

characterised by wide, lush pastoral landscape partly enclosed by woodland giving way to the more open land of the mid-Norfolk NCA to the West. The Wensum has strong hydrological links to the surrounding landscapes, draining areas of the catchment in the North to supply major wetland systems in the Broads. The NCA description acknowledges that the city has an interesting mix of medieval, Georgian and modern architecture and has surprising topographical variance resulting from the Wensum valley. Within the neighbourhood area are a number of designated open spaces (such as Gildencroft Park) however there is a wider network of green spaces across the city including the remnant heathland at Mousehold Heath, and a number of candidate County Geodiversity Sites, such as at Lollard's Pit and Wensum Meadows¹⁹.

3. Introduction to the Norwich Over the Wensum Neighbourhood Plan (NOWNP)

3.1 The NOWNP outlines the following aims of the plan:

- To support high quality and sustainable regeneration, including development of brownfield sites and realising the potential of the area's heritage.
- Maintaining a mixed neighbourhood to meet the housing, employment, recreational, educational, shopping and other diverse needs of the local community.
- To promote sustainable and active travel, enabling walking and cycling.
- To promote high quality, sustainable design, reinforcing local distinctiveness and historic character.
- To ensure that development addresses climate change.
- To protect or enhance green space.
- To enhance the environment and accessibility of the River Wensum.

3.2 The NOWNP consists of 6 policies:

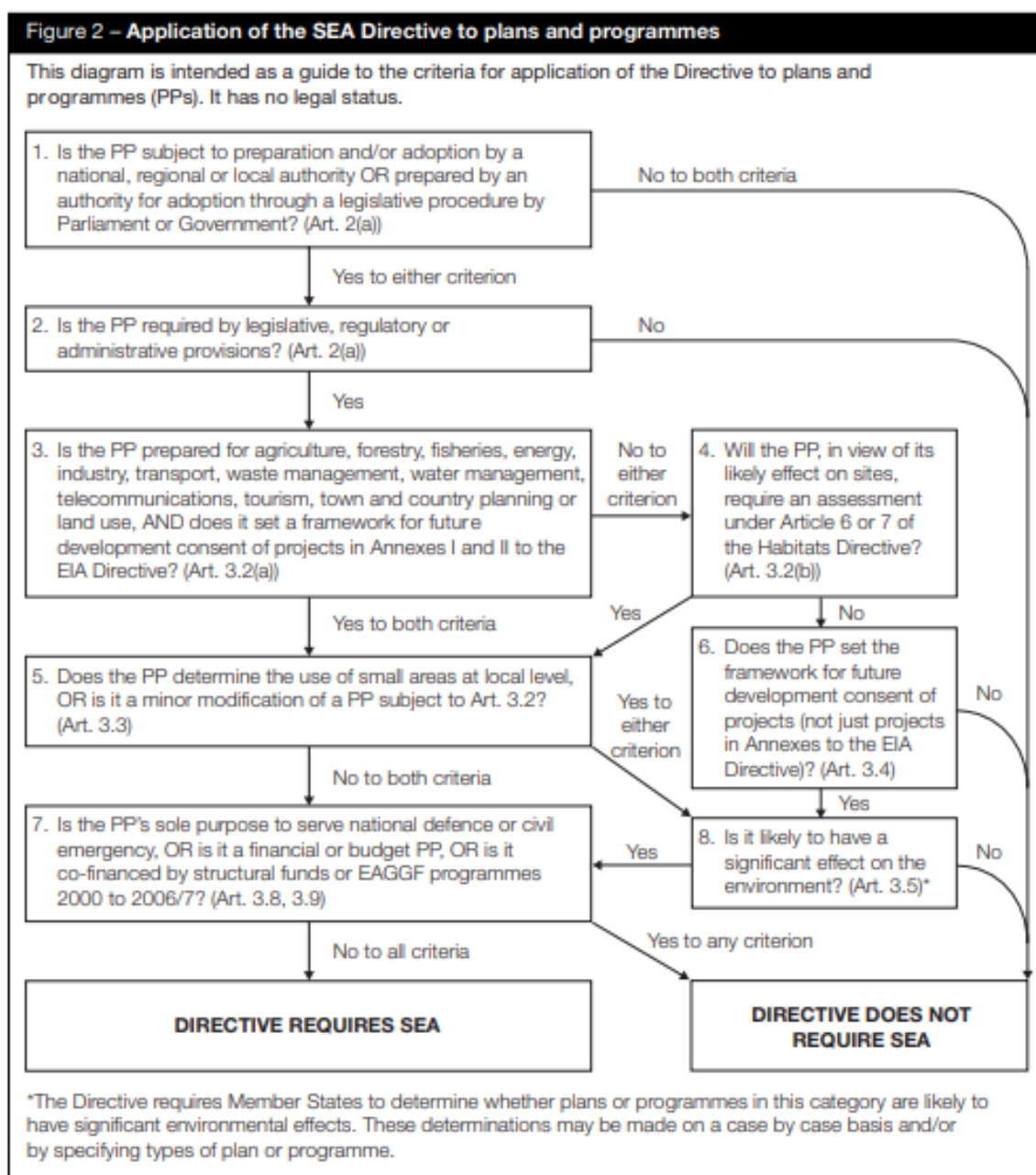
- NOW1 Regeneration: This policy is intended to supplement existing policy to enable high quality development and regeneration of the neighbourhood area. The policy outlines that the development of specific brownfield opportunity sites will be supported, and these are identified on Map 2 of the NOWNP.
- NOW2 Residential Development: This policy seeks to provide housing relevant to the specific needs of the local community.
- NOW3 Heritage, Character and Identity: This policy seeks to ensure development is well designed and reinforces local distinctiveness and historic character.
- NOW4 Sustainable Urban Design: This policy seeks to set the general requirements for sustainable buildings and the creation of safe and permeable environment for pedestrians.
- NOW5 Green and Blue Infrastructure: This policy seeks to protect open spaces and conserve the green and natural character of the river, as well as creating access to the full river frontage.

- NOW6 Sustainable and Active Travel: This policy seeks to reinforce the areas character as a walkable neighbourhood and places emphasis on cycle and pedestrian permeability and connectivity.

4. SEA Screening

- 4.1 SEA may be required for a neighbourhood plan if it is likely to have significant environmental effects. Although Sustainability Appraisal (SA) is similar to SEA, SA also requires assessment of economic and social effect of the plan. Planning Practice Guidance clarifies that there is no legal requirement for a neighbourhood plan to be subject to SA²².
- 4.2 NOW neighbourhood forum have requested that Norwich City Council conduct SEA screening of the draft NOWNP in order to determine whether SEA is required under European Directive 2001/42/C (the SEA Directive), transposed into UK law through the SEA Regulations²³.
- 4.3 The Levelling Up and Regeneration Act 2023²⁴ set out detailed reforms to the planning system. As part of this, the Act allows for the replacement of the current SEA regime with new Environmental Outcomes Reports. These reforms will be enacted through new regulations. Until such time that these reforms have been enacted, this report has been prepared in line with the existing SEA legislation.
- 4.4 Figure 2 is taken from the Practical Guide to the Strategic Environment Assessment Directive 2005²⁵. This is a useful resource for determining whether a plan should be subject to SEA. It is important to note that the Practical Guide has been superseded by Planning Practice Guidance, however it still provides useful guidance on the process of making SEA screening decisions. Figure 2 sets out the considerations to be applied in determining whether SEA is required and is fully compliant with the SEA screening regulations.

Figure 2: Diagram of the application of the SEA Directive to plans and programmes



4.5 Tables 1 and 2 assess whether the NOWNP requires SEA. The second column includes questions taken from the diagram in Figure 1, setting out how the SEA Directive should be applied. Table 1 specifies answers to questions 1-7; table 2 specifies answers to question 8.

Table 1: Application of the SEA Directive to plans and programmes.

Stage	Y/N	Justification
1	Yes	The neighbourhood plan will be made (adopted) subject to passing examination and referendum by

Stage		Y/N	Justification
	authority for adoption through a legislative procedure by Parliament of Government (Art.2(a)) ²³ ?		Norwich City Council as the Local Planning Authority.
2	Is the plan or programme required by legislative, regulatory or administrative provisions? (Art. 2(a)) ²³	No	The preparation of neighbourhood plans is optional to the local community. Whilst the Neighbourhood Plan is not a requirement and is optional under the provisions of The Town and Country Planning Act 1990 as amended by the Localism Act 2011, it will, if 'made', form part of the Development Plan for the District.
3	Is the plan or programme prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive ²⁶ ? (Art. 3.2(a))	No	The neighbourhood plan is prepared for town and country planning purposes, but it does not set a framework for future development consent of projects in Annexes I and II to the EIA Directive (Art. 3.2(a)).
4	Will the plan or programme, in view of its likely effect on sites require an assessment under Article 6 or 7 of the Habitats Directive ²⁷ ? (Art. 3.3)	Yes	While there are no Special Areas of Conservation (SACs) or Special Protection Areas (SPAs) located within the boundary of the neighbourhood plan, the River Wensum SAC & SSSI and Sweet Briar Meadows SSSI are located approximately 2km to the West of the area. In addition, the western half of the neighbourhood area falls within the Zone of Influence for the Sweet Briar Meadows SSSI. Furthermore, The Broads SAC and Broadland SPA and Ramsar sites are located downstream and to the East of the neighbourhood area. St James' Pit SSSI is also located 0.5km to the East of the area, and Catton Grove Chalk Pit SSSI 1.2km to the North.
5	Does the plan or programme determine the use of small areas at local level OR is it a minor	Yes	The neighbourhood plan proposes a number of small sites across the area where redevelopment to

Stage		Y/N	Justification
	modification of a PP subject to Art. 3.2 ²³ ? (art. 3.3)		alternative uses would be supported in principle.
6	Does the plan or programme set the framework for future development consent of projects (not just projects in Annexes to the EIA directive) ²⁶ ? (Art.3.4)	Yes	The scope of the neighbourhood plan includes setting the framework for future development consent of projects. Once made, the neighbourhood plan will form part of the local development plan and its policies will need to be taken into account alongside the existing local planning policies as part of planning decision making in Norwich.
7	Is the plan or programme's sole purpose to serve national defence of civil emergency, OR is it a financial or budget plan or programme, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art. 3.8, 3.9)	No	The purpose of the neighbourhood plan is not for any of the projects listed in Art 3.8, 3.9.
8	Is it likely to have a significant effect on the environment? (Art. 3.5)	Yes	See Table 2.

3.6 Schedule 1 of the SEA Regulations sets out the criteria for determining the likely significance of effects of a plan or programme to question 8 in Figure 2. These are listed in Table 2 below along with an assessment of whether there are any likely significant effects of the NOWNP.

Table 2: Assessment of likely significant effects of the NOW neighbourhood plan against SEA Directive criteria

SEA Directive Criteria		Y/N	Reason
1	The Characteristics of Plans and Programmes, having regard, in particular, to:		
	a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	Yes	<p>Once made, the NOWNP would become part of the statutory development plan and would guide delivery of development within the area.</p> <p>The NOWNP proposes brownfield opportunity sites where development would be supported in principle. This is analogous to a site allocation policy, which seeks to set out which sites are acceptable in principle for</p>

	SEA Directive Criteria	Y/N	Reason
			development and to identify the appropriate uses and quantum of development. Some of the sites in the NOWNP provide this level of detail, while others do not. The brownfield opportunity sites comprise a mixture of both sites already allocated in the GNLP and new sites which are not currently allocated. The inclusion of these additional sites would be setting a framework for additional growth in those locations which does not currently exist.
	b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	No	Neighbourhood plans must be in accordance with the strategic and higher-level policy for the area, in this case the Norwich Development Management Policies Local Plan, The Greater Norwich Local Plan and the National Planning Policy Framework. The NOWNP can only provide policies for the area that it covers and is unlikely to have a significant effect on higher level policy. In addition, there are no other neighbourhood plans within Norwich, and the closest neighbourhood plan is in Trowse within South Norfolk Council's area.
	c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	Yes	<p>Neighbourhood plans are required to contribute to the achievement of sustainable development.</p> <p>The NOWNP proposes brownfield opportunity sites where development would be supported in principle. This represents additional growth over and above what is adopted in the GNLP which is likely to have an effect on environmental considerations relevant to delivering sustainable development.</p>
	d) Environmental problems relevant to the plan or programme	Yes	Section 2.2 of this report outlines the environmental constraints and issues relevant to the neighbourhood

SEA Directive Criteria		Y/N	Reason
			<p>area. In particular, the neighbourhood area is located within the IRZ of several SSSIs, is within the vicinity of several other SSSIs/SACs, is located within a nitrate vulnerable zone and subject to nutrient neutrality restrictions, subject to high fluvial flood risk due to its location adjacent to the River Wensum chalk stream and is an area of wastewater treatment and water supply stress.</p> <p>The NOWNP proposes brownfield opportunity sites where development would be supported in principle. Sites for new development are likely to impact upon issues such as flood risk, wastewater treatment capacity, water supply, pollution levels and impacts upon protected habitats and species.</p> <p>As these sites are proposing additional growth to those in the adopted GNLP, their impacts have not already been considered within those adopted policies or the completed Sustainability Appraisal of those policies.</p>
	e) The relevance of the plan or programme for the implementation of EU community legislation on the environment (eg plans and programmes linked to waste management or water protection)	No	The NOWNP will need to be prepared in general conformity with the policies in the Development Management Policies Local Plan, the Greater Norwich Local Plan and the National Planning Policy Framework. The plan has no relevance to the implementation of EU community legislation.
2	Characteristics of the effects and of the area likely to be affected, having regard, in particular to:		
	a) The probability, duration, frequency and reversibility of the effects	Yes	The NOWNP proposes brownfield opportunity sites where development would be supported in principle. The redevelopment of these sites would

SEA Directive Criteria		Y/N	Reason
			likely result in the permanent change of the use and built form of the sites.
	b) The cumulative nature of the effects	Yes	The NOWNP area is already anticipated to accommodate additional growth, in particular through the provision of 800 homes on the strategic site allocation of the Anglia Square site. The proposed brownfield opportunity sites would result in additional growth which would likely have cumulative impacts when considered with the already planned for growth.
	c) Transboundary nature of effects	Yes	The NOWNP area is located within a dense urban area and is therefore strongly related to the surrounding neighbourhoods. The plan contains policies which are likely to impact upon surrounding areas, such as those dedicated to design. In addition, the plan proposes brownfield opportunity sites where development would be supported in principle – a number of these sites are located directly adjacent to the boundary of the area. It is therefore likely that the NOWNP will affect areas outside of its own boundary.
	d) The risks to human health or the environment (for example, due to accidents)	Yes	The NOWNP area is already expected to accommodate additional growth through sites allocated in the GNLP. The proposed brownfield opportunity sites would result in additional growth which could result in increased traffic or other emissions. In addition, a number of these brownfield opportunity sites are identified as being potentially contaminated due to their previous uses.
	e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	Yes	The NOWNP area covers an area of approximately 54ha. The neighbourhood plan proposes brownfield opportunity sites where

	SEA Directive Criteria	Y/N	Reason
			development would be supported in principle. Due to its city centre location, and the dense urban environment, the NOWNP is also likely to have an effect on adjacent neighbourhoods, both geographically and the size of the population likely to be affected.
	<p>f) The value and vulnerability of the area likely to be affected due to –</p> <ul style="list-style-type: none"> i. Special natural characteristics or cultural heritage; ii. Exceeded environmental quality standards or limit values; or iii. Intensive land-use 	Yes	<p>Section 2.2 sets out the constraints and issues relevant to the neighbourhood area. The area has a significant number of nationally and locally designated heritage assets, is within a conservation area, and has important views of significant parts of the city skyline, such as Norwich Cathedral.</p> <p>The River Wensum, an important and rare chalk stream, borders the area, and the western half of the area falls within the IRZs of several nearby SSSIs. There are numerous water quality restrictions in place for the neighbourhood and surrounding areas such as source protection and nitrate vulnerable zones.</p> <p>The NOWNP includes brownfield opportunity sites where development would be supported in principle. The development of these sites is likely to have an impact upon the above characteristics.</p> <p>In addition, the NOWNP contains policies relating to impacts on heritage assets, design and materials, sustainable transport, green infrastructure and green building standards, which may also impact on these characteristics.</p>
	g) The effects on areas of landscapes which have a recognised national, Community or international protection status	Yes	The closest nationally/internationally recognised landscape is the Broads, which is a National Park and comprises SSSIs, SACs, SPAs and Ramsar sites.

SEA Directive Criteria	Y/N	Reason
		The boundary of the Broads National Park includes the River Wensum into the city up to New Mills. This includes the section of the Wensum that borders the NOWNP area. The neighbourhood area is set within the dense urban environment of the city centre and therefore the policies in the NOWNP and the in-principle support for developing the brownfield opportunity sites is unlikely to have a direct impact on this designated landscape. However, there may be indirect impacts, particularly considering the NOWNP is upstream of the Broads designated sites.

5. SEA Conclusion

- 5.1 A SEA screening assessment has been undertaken by applying the criteria from SEA Directive and Schedule 1 of the SEA Regulations to determine whether or not the NOWNP is likely to have significant environmental effects when assessed against the criteria in the SEA Regulations.
- 5.2 The NOWNP sets out aims and planning policies to shape the local area up to the end of 2035 and, should the plan be successfully made, will be a material consideration in the determination of planning applications for that area. The NOWNP includes brownfield opportunity sites where development will be supported, and a number of these sites are in addition to those already allocated in the GNLP. The plan also contains policies relating to design, green infrastructure and protection/enhancement existing natural and cultural assets which could impact upon vulnerable characteristics of the area.
- 5.3 On this basis, it is considered that the NOWNP will require the submission of a full SEA.

6. HRA Screening

- 6.1 Habitat Regulations Assessment (HRA) is the process to assess if the potential effects of a plan or project proposal could significantly harm the designated features of a European site. These sites are protected by the Habitats Directive (Council Directive 92/43/EEC) transposed into UK law by the Conservation of Habitats and Species Regulations 2017 (as amended)²⁸.
- 6.2 These sites provide valuable ecological infrastructure for the protection of rare, endangered or vulnerable natural habitats and species of exceptional importance within the EU. These sites are comprised of Special Areas of

Conservations (SACs), Special Protection Areas (SPAs) and Sites of Special Scientific Interest (SSSIs).

6.3 The HRA process is made up of three stages: Screening – to check if the proposal is likely to have a significant effect on a site's conservation objectives. If not, you do not need to proceed with the next two steps; Appropriate assessment – to assess the likely significant effects in more detail and identify ways to avoid or minimise any effects; Derogation – to consider if proposals that would have an adverse effect would qualify for an exemption. More detailed information on the HRA process can be found online²⁹.

6.4 The HRA screening process should include the following parts:

Step 1 - Set out a description of the plan or proposal and identify any of the relevant protected sites that could be impacted.

Step 2 – Check if the whole proposal is for conservation management of the designated sites. You must continue the screening process if the plan or proposal contains conservation management that could negatively affect a different feature or site; or if the plan or proposal contains non-conservation management activities such as development.

Step 3 – Check if the plan or proposal could have a significant effect on a European site that could affect its conservation objectives. You should only consider real, not hypothetical risk. A plan or proposal could cause a significant effect if it: reduces the amount of quality of designated habitats, limits the potential to restore these habitats in future, causes significant disturbance to designated species, or disrupts natural processes that support the site's designated features.

Step 4 – Check for combined effects. You must check if the effect on a European site could combine with any other proposal planned or underway, and effects that same site, could in combination have a significant effect.

6.5 Under Regulation 106 of the Habitat Regulations, the HRA must determine if the project or plan is likely to have a significant effect on a European site. This process must apply the precautionary principle at every stage which means that if you cannot rule out:

- the risk of a proposal having a significant effect on the conservation objectives of a European site at stage 1: screening, you must carry out an appropriate assessment
- all reasonable scientific doubt of an adverse effect on a site's integrity at stage 2: appropriate assessment, you must refuse the proposal unless an exemption (stage 3: derogation) is justified

6.6 The screening stage should not consider any mitigation measures for the purpose of avoiding or minimising risk to a European site. These mitigation measures need to be considered at the appropriate assessment stage.

6.7 The NOW neighbourhood forum have requested that Norwich City Council undertake Stage 1 HRA Screening of the NOWNP to determine if an Appropriate Assessment is required under European Directive 92/43/EEC (the Habitats Directive) and transposed into UK law by the Conservation of Habitats and Species Regulations 2017.

Part 1 – Description of the plan or proposal

6.8 Section 3 of this report provides a summary of the neighbourhood plan content and policies. Of particular relevance is the inclusion of brownfield opportunity sites where development will be supported in principle. This is analogous to a site allocation policy, which seeks to set out which sites are acceptable in principle for development and, in some cases, identifies the appropriate uses for new development. The brownfield opportunity sites comprise a mixture of both sites already allocated in the GNLP and new sites which are not currently allocated. The inclusion of these additional sites would be setting a framework for additional growth in those locations which does not currently exist. The NOWNP also proposes policies which would impact upon design, provision of green infrastructure and the protection/enhancement of existing natural and cultural assets

Part 1 - Identification of any protected sites that could be affected.

6.9 Section 2.2 provides a summary of the neighbourhood area, its assets and constraints. The NOWNP does not have any SPAs, SACs or Ramsar sites that fall within the boundary of the area. However, the following are located in proximity to the area:

- River Wensum SAC and SSSI – 2.9km west of NOWNP
- The Broads Ramsar, SPA and SAC – 7.2km East of NOWNP
- Sweet Briar Meadow SSSI – 1.6km West. NOWNP within IRZ
- St James' Pit SSSI – 0.7km East. NOWNP within IRZ
- Catton Chalk Pit SSSI – 1.1km North of NOWNP

Further details of each of these designations, their features and pressures are set out in Appendix A.

Part 2 – Is the plan or proposal for conservation management purposes of designated sites?

6.10 The NOWNP sets out planning policies to be used in the determination of planning applications and proposes brownfield opportunity sites where development would be supported in principle. Therefore, the NOWNP is not a plan for conservation management purposes of designated sites.

Part 3 & 4 – Assessment of the likely significant effects of the plan or proposal on its own and in combination with other plans or proposals.

6.11 The screening of each of the policies in the NOWNP includes consideration of the following:

- Land taken directly by development
- Increased disturbance e.g. from recreational use
- Changes in water availability or quality, increased wastewater treatment demand and changes in surface and ground water regimes
- Impacts on protected species within or movement through
- Changes in atmospheric pollution e.g. changes to traffic movements
- Direct, indirect, temporary, permanent and in combination effects.

6.12 Table 3 sets out the assessment of the likely significant effects of the NOWNP.

Table 3: HRA Screening Assessment of the likely significant effects of the NOWNP on protected sites.

Policy	Feature	Likely Effect
NOW1	This policy is intended to supplement existing policy to enable high quality development and regeneration of the neighbourhood area. The policy outlines that the development of specific brownfield opportunity sites will be supported, and these are identified on Map 2 of the NOWNP.	<p>The NOWNP does not propose to directly develop land within designated sites.</p> <p>However, NOW1 proposes brownfield opportunity sites where development would be supported in principle. This is analogous to a site allocation policy, which seeks to set out which sites are acceptable in principle for development and to identify the appropriate uses and quantum of development. The brownfield opportunity sites comprise a mixture of both sites already allocated in the GNLP and new sites which are not currently allocated. The inclusion of these additional sites would be setting a framework for additional growth in those locations which does not currently exist.</p> <p>The development of these sites could have the following impacts on designated sites:</p> <ul style="list-style-type: none"> • Increased water pollution from construction, changes to surface water runoff as a result of additional impermeable surfaces/changes to flows. This is particularly relevant considering the neighbourhood plan area is upstream of the Broads designated sites. • Additional demand for wastewater treatment from the provision of additional growth. • Increased demand for water availability from the provision of additional growth. • Increased disturbance for recreational use if there is an increase in population. This is particularly important considering the neighbourhood plan area falls within multiple ZOIs for recreational impacts.

Policy	Feature	Likely Effect
		<ul style="list-style-type: none"> Increased pollution from additional/altered traffic movements. <p>The above effects could be exacerbated when considered in combination with the potential effects of development sites that have already been allocated within and nearby to the NOWNP area and could therefore result in likely significant effects on designated sites.</p>
NOW2	This policy seeks to provide housing relevant to the specific needs of the local community.	The purpose of NOW2 is not to consider the principle of providing additional housing, but specifies that, where new housing is proposed, its tenure/specification mix should respond to the needs of the local community. The differences between tenure/specification mix are not considered to have any likely significant effects on designated sites.
NOW3	This policy seeks to ensure development is well designed and reinforces local distinctiveness and historic character.	The purpose of NOW3 is to protect existing heritage and preserve the existing character and pattern of development within the local area. The policy looks at small, localised actions which are not likely to have any significant effects on designated sites.
NOW4	This policy seeks to set the general requirements for sustainable buildings and the creation of safe and permeable environment for pedestrians.	<p>NOW4 could have the following effects on designated sites:</p> <ul style="list-style-type: none"> Changes to surface and groundwater regimes including the potential for additional pollution through the use of SUDS and permeable surfacing. This is particularly important given the neighbourhood area is upstream of the Broads designated sites. Reduced atmospheric pollution in the locality by requiring more efficient building specifications that could result in less emissions e.g. such as through gas boilers. However, this is likely to be small/localised effects.
NOW5	This policy seeks to protect open spaces and conserve the green and natural character of the river,	<p>NOW5 could have the following effects on designated sites:</p> <ul style="list-style-type: none"> Impacts on species within or moving through the area through the creation/enhancement of blue and green infrastructure.

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Policy	Feature	Likely Effect
	as well as creating access to the full river frontage.	<p>This could create corridors or stepping stones between designated sites. This could positively impact if these are desirable species or negatively impact if non-native invasive species. This is particularly important given the River Wensum borders the NOWNP boundary and is an important link between the Wensum and Broads designated sites.</p> <ul style="list-style-type: none"> • Could reduce atmospheric pollution through increased vegetation planting, although this is likely to be small/localised effects.
NOW6	This policy seeks to reinforce the areas character as a walkable neighbourhood and places emphasis on cycle and pedestrian permeability and connectivity	NOW6 does not propose any new infrastructure but encourages walking and wheeling modes of transport. The policy looks at small, localised actions which are not likely to have any significant effects on designated sites.

7. HRA Conclusion

- 7.1 An HRA screening assessment has been undertaken to determine if the NOWNP is likely to lead to potential adverse effects on a European site.
- 7.2 This assessment has determined that the NOWNP may be likely to have a significant effect on one or more European site. The neighbourhood plan is not necessary for, or connected to, conservation management purposes. Therefore, an Appropriate Assessment is required.

8. Overall Conclusion

- 8.1 NOWNP sets out aims and planning policies to shape the local area up to the end of 2035 and, should the plan be successfully made, will be a material consideration in the determination of planning applications for that area. The NOWNP includes brownfield opportunity sites where development will be supported, and a number of these sites are in addition to those already allocated in the GNLP. The plan also contains policies which would impact upon design, new infrastructure and existing natural and cultural assets. The NOWNP area does not contain or overlap with any European designated sites, however there are a number within several kilometres and the area falls within Impact Risk Zones of multiple SSSIs and Zones of Influence for recreational impact. It's location directly adjacent to the River Wensum is particularly important given the area is situated between the designated sites of the Wensum both upstream and the Broads downstream. The proposals for brownfield opportunity sites, and elements of the policies relating to drainage, and creating/enhancing green and blue infrastructure could potentially have likely significant effects on European sites.
- 8.2 This screening assessment has been performed in relation to the draft neighbourhood plan (V2.2). NOW intend to make changes to the plan prior to undertaking the Reg14 pre-submission consultation. Upon receipt of the final draft of the plan the council will review the policies therein to understand if there have been any significant changes. If so, then the local planning authority may update this assessment at that time. NOW have been informed that any changes to the draft neighbourhood plan could change the council's SEA/HRA screening assessment.
- 8.3 This assessment report has been sent to the statutory consultation bodies. Detailed responses are set out in Appendix B. In summary: Historic England concur with the council's opinion, and the Environment Agency state they do not disagree with the opinion. Natural England's response sets out that they do not consider the plan would have likely significant effects on protected sites. However, their response is caveated that they do not hold locally specific information on environmental assets, and that this and local expertise should be considered in determining whether appropriate assessments are required. The council's screening report opinion includes assessment of locally specific information on environmental assets in coming to the conclusion that full appropriate assessments are required.

8.4 On this basis of this assessment, it is concluded that **the NOWNP will require the submission of a full SEA and an HRA Appropriate Assessment.**

Appendix A – Designated Sites

River Wensum SAC and SSSI – 2.9km west of NOWNP
Reason for designation
This site is considered to be one of the best areas in the United Kingdom for several species such as the White-clawed crayfish and supports a significant presence of other such as Desmoulin's whorl snail. ³⁰
Features
3260 Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation; Rivers with floating vegetation often dominated by water-crowfoot S1016 Vertigo moulinsiana; Desmoulin's whorl snail S1092 Austropotamobius pallipes; White-clawed (or Atlantic stream) crayfish S1096 Lampetra planeri; Brook lamprey S1163 Cottus gobio; Bullhead
Pressures
Water pollution Water abstraction Cutting/mowing regimes Siltation Structures (not flood defence related) Terrestrial plants Water company discharges ³¹

The Broads Ramsar, SPA and SAC – 7.2km East of NOWNP
Reason for designation
These sites are considered to be some of the best in the United Kingdom for several species and habitats such as natural eutrophic lakes and alkaline fens. In addition these sites are one of only three known outstanding localities in the United Kingdom for the Fen Orchid. ³²
Features
H3140 Hard oligo-mesotrophic waters with benthic veg of Chara spp. H3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition H6410 Molinia meadows on calcareous, peat or clay-silt soil H7140 Transition mires and quaking bogs H7210 Calcareous fens with C. mariscus and species of C. davallianae H7230 Alkaline fens H91E0 Alluvial woods with A. glutinosa, F. excelsior S1016 Desmoulin's whorl snail, Vertigo moulinsiana S1355 Otter, Lutra lutra S1903 Fen orchid, Liparis loeselii S4056 Little ram's-horn whirlpool snail, Anisus vorticulus ³³
Pressures
Invasive non-native species Sediment management regime Unknown sources of water pollution Private discharges causing water pollution Hard structures Drainage

Cutting/mowing regimes Weeds/inappropriate species Water abstraction Water level changes ³⁴

These are of particular relevance, as they are designated water environments that are upstream and downstream of the section of the River Wensum that borders the neighbourhood and forms part of the catchment that drains into The Broads.

In addition, there are a number of other relevant designations to the neighbourhood area:

Sweet Briar Meadow SSSI – 1.6km West. NOWNP within IRZ
Reason for designation
This site consists of a series of unimproved wet meadows with permanent water-logging lying in the Wensum Valley close to Norwich. It forms the best remaining example of a type of wetland habitat which at one time was more widely occurring in the river valleys of east Norfolk but which has been lost or progressively altered in post war years due to drainage and agricultural improvements. It is particularly unusual for a site of this quality and size to remain within an urban area and still be subject to regular winter flooding. ³⁵
Features
MG8 - <i>Cynosurus cristatus</i> - <i>Caltha palustris</i> grassland S5 - <i>Glyceria maxima</i> swamp NEUTRAL GRASSLAND - Lowland
Pressures
Water abstraction Water pollution from agricultural activities ³⁶

St James' Pit SSSI – 0.7km East. NOWNP within IRZ.
Reason for designation
Well known for its Upper Cretaceous mosasaur fossil remains. Mosasaurs, is a large marine reptile, are relatively uncommon within British Cretaceous strata. St. James' Pit however, has yielded teeth and individual bones, including jaw and vertebrae, belonging to two mosasasaur genera, Mosasaurs and Leiodon. The remaining unexcavated chalk sequence within St. James' Pit is regarded as having the best potential for future mosasasaur finds with the British Cretaceous. ³⁷
Features
ED - Jurassic - Cretaceous Reptilia ³⁸
Pressures
N/A

Catton Chalk Pit SSSI – 1.1km North
Reason for designation
Locality for the Upper Chalk (Cretaceous) Catton Sponge Bed. This famous late Campanian rock unit represents an early diagenetic hardened level (hardground) which has well preserved fauna including important ammonites and many undescribed sponges. This seldom exposed horizon representing a hardened sea bed (a rarity in the Chalk) is an important marker band across East Anglia and is best seen at Catton. ³⁹

Features
ED - Cenomanian-Maastrichtian ⁴⁰
Pressures
Scrub encroachment ⁴¹

Appendix B – Screening Consultation Responses

HISTORIC ENGLAND

From: McGivern, Ross <Ross.McGivern@HistoricEngland.org.uk>
Sent: Tuesday, November 12, 2024 6:13 PM
To: Rivett, Charlotte <CharlotteRivett@norwich.gov.uk>
Subject: Norwich Over the Wensum neighbourhood plan SEA Screening Opinion

External Email: Be cautious about the sender email address, attachments and links.
If uncertain please delete the email.

Dear Charlotte,

Thank you for your email regarding the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome this opportunity to review this request for a Screening Opinion. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the neighbourhood plan) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.

The supporting information (screening report and draft neighbourhood plan) supplied with the consultation indicates that within the plan area there is a range of designated historic environment assets. There is also likely to be other features of local historic, architectural or archaeological value, and consideration should also be given to the wider historic landscape. The documentation indicates that the Norwich over the Wensum Neighbourhood Plan proposes 'brownfield opportunity sites where development would be supported in principle. This represents additional growth over and above what is adopted in the GNLP which is likely to have an effect on environmental considerations relevant to delivering sustainable development'.

Given the likely significant effects (both positive and negative) upon the historic environment, Historic England hence concurs with the Council's view that a Strategic Environmental Assessment will be required.

I should be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Historic England strongly advises that the conservation and archaeological staff of the relevant local authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), how the allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

We should like to stress that this opinion is based on the information provided by you with your correspondence below. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan) where we consider that, despite the SEA, these would have an adverse effect upon the environment.

Please do contact me, either via email or the numbers below, if you have any queries.

Kind regards,
Ross

Ross McGivern (he/him)
Historic Places Adviser
Mobile no – 07766 206210
Tel: 01223 582709
East of England Region
Partnerships Team



Historic England

Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.

Follow us: [Facebook](#) | [Twitter](#) | [Instagram](#) Sign up to our [newsletter](#)

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ENVIRONMENT AGENCY

Charlotte Rivett
Norwich City Council
Planning Department
City Hall St. Peters Street
Norwich
Norfolk
NR2 1N

Our ref: AE/2024/129966/01-L01
Date: 22 November 2024

Dear Charlotte

NORWICH OVER THE WENSUM NEIGHBOURHOOD PLAN SEA/HRA SCREENING OPINION CONSULTATION

Thank you for your consultation on the SEA and HRA screening for the draft Norwich Over The Wensum Neighbourhood Plan (NOWNP), dated 18 October 2024.

We have reviewed the documents, as submitted, and do not disagree with the conclusion that the submission of a full SEA and an HRA Appropriate Assessment will be required. We have provided the below advisory comments regarding environmental constraints within our remit that will affect the NOWNP.

Flood Risk

As set out in the SEA & HRA Screening Report, Policy NOW1 of the Plan: “proposes brownfield opportunity sites where development would be supported in principle. This is analogous to a site allocation policy, which seeks to set out which sites are acceptable in principle for development and to identify the appropriate uses and quantum of development. The brownfield opportunity sites comprise a mixture of both sites already allocated in the GNLP and new sites which are not currently allocated.”

Some of the brownfield and car park sites proposed for development in Map 2 are located in areas of Flood Zones 2/3 within the Neighbourhood Plan Area. The Local Authority’s Strategic Flood Risk Assessment and Surface Water Management Plans form the evidence base to determine the level of flood risk in this area. Cont/d.. 2

A Sequential Test will need to be carried out to confirm those proposed brownfield sites not already allocated in the GNLP are appropriate for development. Diagram 2 in the Planning Practice Guidance: Flood Risk and Coastal Change (Paragraph 025, Reference. ID: 7-025-20220825) illustrates how the Sequential Test can be applied in the preparation of strategic policies. This work could be undertaken as part of an SEA. Any sites that do come forward for development in areas of flood risk will need to be designed to ensure that the flood risk can be managed safely, without increasing the risk of flooding elsewhere.

Water Quality

As identified in the report, “Whitlingham Water Recycling centre is one of the locations which has been identified as not having sufficient capacity to treat additional waste waters from unplanned development”. There is therefore potential for there to be a barrier to growth across the Plan Period and delivery of development sites. Consideration for phasing of development in line infrastructure improvements may be required. The Plan should have consideration to the GNLP Water Cycle Study (WCS) and any relevant water quality policies, and advice should be sought from Anglian Water Services regarding how growth could be accommodated within the local WRC catchment

Water Resources

Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with Anglian Water, in line with their Draft 2024 Water Resources Management Plan. The Local Planning Authority's Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.

New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the Water Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at Abstraction licensing strategies (CAMS process) - GOV.UK (www.gov.uk).

Groundwater and Contaminated Land

The Plan area is located in an area of high environmental sensitivity. In particular, the area is set on a principal aquifer and underlain by primarily Source Protection Zone 2, where any pollution entering groundwater will be modelled to reach the

groundwater supply within 400 days. The site's location next to the River Wensum, an important and rare chalk stream, is also identified in the submitted report.

As also identified in the report, a number of the brownfield opportunity sites proposed for development are potentially contaminated due to their previous uses. Any development proposals need to be carefully considered with reference to our Groundwater Protection guidance:

<https://www.gov.uk/government/collections/groundwater-protection>

Informative

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: [How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning](#)

We trust this advice is useful.

Yours sincerely

Mr Alasdair Hain-Cole

Planning Officer

Direct dial 02030 255475

Direct e-mail planning.eastanglia@environment-agency.gov.uk

NATURAL ENGLAND

Date: 18 December 2024

Our ref: 491269

Your ref: n/a

Charlotte Rivett
Development and City Services
Norwich City Council
BY EMAIL ONLY

Dear Charlotte

Norwich Over the Wensum Neighbourhood Plan – Strategic Environmental Assessment and Habitats Regulations Assessment Screening Consultation

Thank you for your consultation on the above dated 18 October 2024 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Request: Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA)

It is Natural England's advice, on the basis of the material supplied with the consultation, that:

- **significant effects on statutorily designated nature conservation sites or landscapes are unlikely; and,**
- **significant effects on Habitats sites¹ either alone or in combination, are unlikely.**

The proposed neighbourhood plan is unlikely to significantly affect any Site of Special Scientific Interest (SSSI), Marine Conservation Zone (MCZ), Special Areas of Conservation (SAC), Special Protection areas (SPA), Ramsar wetland or sites in the process of becoming SACs or SPAs ('candidate SACs', 'possible SACs', 'potential SPAs') or a Ramsar wetland. The plan area is unlikely to have a significant effect on a National Park, Area of Outstanding Natural Beauty or Heritage Coast, and is unlikely to impact upon the purposes for which these areas are designated or defined.

Guidance on the assessment of Neighbourhood Plans, in line with the Environmental Assessment of Plans and Programmes Regulations 2004 is contained within the

¹ Habitats sites are those referred to in the National Planning Policy Framework (Annex 2 - glossary) as "any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites". ,

Planning Practice Guidance. This identifies three triggers that may require the production of an SEA:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require an SEA. Further information is included in Natural England's standing advice on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant an SEA. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a SEA is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a SEA is required, Natural England must be consulted at the scoping and environmental report stages.

Please send any new consultations, or further information on this consultation to consultations@naturalengland.org.uk.

Yours sincerely
Louise Oliver
Higher Officer – Sustainable Development
Norfolk and Suffolk Team

Appendix C – Sources

¹ All environmental constraints can be viewed by switching on the relevant layers of this map [Magic Map Application \(defra.gov.uk\)](https://magic.defra.gov.uk/)

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- ² As defined in the Norfolk Green Infrastructure Recreation Avoidance and Mitigation Strategy
[Planning documents | Norwich City Council](#)
- ³ [Document downloads - Norwich Biodiversity Baseline Study 2024 | Norwich City Council](#)
- ⁴ [Data Explorer - Norfolk Insight](#)
- ⁵ [Health and social care - Map explorer - Norfolk Insight](#)
- ⁶ [BGS Geology Viewer \(BETA\)](#)
- ⁷ [Flood risk information for this location - Flood map for planning - GOV.UK \(flood-map-for-planning.service.gov.uk\)](#)
- ⁸ [Where do you want to check? - Check your long term flood risk - GOV.UK \(check-long-term-flood-risk.service.gov.uk\)](#)
- ⁹ [Norwich Urban Area SWMP - Norfolk County Council](#)
- ¹⁰ [Magic Map Application \(defra.gov.uk\)](#)
- ¹¹ [About nutrient neutrality | Nutrient Neutrality | Norwich City Council](#)
- ¹² [Greater Norwich Water Cycle Study Final Version March 2021.pdf \(gnlp.org.uk\)](#)
- ¹³ [Water stressed areas - final classification \(publishing.service.gov.uk\)](#)
- ¹⁴ [AQMA Details - Defra, UK](#)
- ¹⁵ [My Norwich](#)
- ¹⁶ [workingpaper1_sophiegirling.pdf \(norwichclimate.org\)](#)
- ¹⁷ [2. Strategic Sites - draft final 0.pdf \(gnlp.org.uk\)](#)
- ¹⁸ [3. Norwich - draft final 0.pdf \(gnlp.org.uk\)](#)
- ¹⁹ [Norwich Local Plan](#)
- ²⁰ [Article 4 direction relating to the conversion of offices to residential | Article 4 direction relating to the conversion of offices to residential | Norwich City Council](#)
- ²¹ [Natural England - National Character Area Profiles - National Character Area Profiles \(nationalcharacterareas.co.uk\)](#)
- ²² Paragraph 072 Reference ID: 41-072-20190509 [Neighbourhood planning - GOV.UK \(www.gov.uk\)](#)
- ²³ The Environment Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) as amended by The Environmental Assessment and Miscellaneous Planning (amendment) (EU Exit) Regulations 2018 (SI 2018/1232).
- ²⁴ [Levelling-up and Regeneration Act 2023 \(legislation.gov.uk\)](#)
- ²⁵ [A Practical Guide to the Strategic Environmental Assessment Directive \(publishing.service.gov.uk\)](#)
- ²⁶ [The Town and Country Planning \(Environmental Impact Assessment\) Regulations 2017 \(legislation.gov.uk\)](#)
- ²⁷ [The Conservation of Habitats and Species Regulations 2017 \(legislation.gov.uk\)](#)
- ²⁸ [The Conservation of Habitats and Species Regulations 2017 \(legislation.gov.uk\)](#)
- ²⁹ [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](#)
- ³⁰ [UK0012647.pdf \(jncc.gov.uk\)](#)
- ³¹ [Site Pressures \(naturalengland.org.uk\)](#)
- ³² [UK0013577.pdf \(jncc.gov.uk\)](#)
- ³³ [The Broads - Special Areas of Conservation \(jncc.gov.uk\)](#)
- ³⁴ [Site Pressures \(naturalengland.org.uk\)](#)
- ³⁵ [1000389 \(naturalengland.org.uk\)](#)
- ³⁶ [Site Pressures \(naturalengland.org.uk\)](#)
- ³⁷ [2000158 \(naturalengland.org.uk\)](#)
- ³⁸ [SSSI detail \(naturalengland.org.uk\)](#)
- ³⁹ [1001515 \(naturalengland.org.uk\)](#)
- ⁴⁰ [SSSI detail \(naturalengland.org.uk\)](#)
- ⁴¹ [Site Pressures \(naturalengland.org.uk\)](#)