

Strategic Environmental Assessment (SEA) for the Norwich Over the Wensum Neighbourhood Plan

**Environmental Report to accompany Regulation 14 consultation on
the Neighbourhood Plan**

Norwich Over the Wensum Neighbourhood Forum

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Quality information

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Table of Contents

Non-Technical Summary	i
1. Introduction	1
2. What is the NOWNP seeking to achieve?	3
3. What is the scope of the SEA?	5
Part 1: Assessment of reasonable alternatives	13
4. Introduction (to Part 1)	14
5. Exploring reasonable alternatives	15
6. Preferred approach for the Neighbourhood Plan	17
Part 2: What are the SEA findings at this stage?	18
7. Introduction (to Part 2)	19
8. Assessment of the plan	21
9. Conclusions and recommendations	29
Part 3: What are the next steps?	31
10. Next steps	32
Appendix A Regulatory requirements	33
Appendix B Scoping information	39

Non-Technical Summary

Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Norwich Over the Wensum Neighbourhood Plan (hereafter referred to as “the NOWNP”).

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the NOWNP is a legal requirement.¹

The NOWNP is being prepared by the Neighbourhood Forum under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012 and in the context of the Greater Norwich Local Plan (GNLP), which was adopted in March 2024. Once ‘made’, the NOWNP will have material weight when deciding on planning applications alongside the GNLP.

This report is the Environmental Report for the NOWNP. It is published alongside the ‘pre-submission’ version of the Plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).

Structure of the Environmental Report / Non-Technical Summary

SEA reporting essentially involves answering the following questions in turn:

1. Assessment of reasonable alternatives
2. What are the SEA findings at this stage? — i.e., in relation to the draft plan.
3. What happens next?

Each of these questions is answered in turn within a discrete ‘part’ of the Environmental Report and summarised within this Non-Technical Summary (NTS). However, firstly there is a need to set the scene further by answering the questions ‘What is the Plan seeking to achieve?’ and ‘What’s the scope of the SEA?’

What is the NOWNP seeking to achieve?

A total of seven planning aims have been identified following analysis of the neighbourhood area and outcomes from community engagement, which are:

1. To support high quality and sustainable regeneration, including development of brownfield sites and realising the potential of the area’s heritage.
2. Maintaining a mixed neighbourhood to meet the housing, employment, recreational, educational, shopping and other diverse needs of the local community.
3. To promote sustainable and active travel, enabling walking and cycling.

¹ Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: a) an environmental report; or b) a statement of reasons why SEA is not required, prepared following a ‘screening’ process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations (‘the SEA Regulations’). The NOWNP was subject to screening by Norwich City Council in 2024 and Scoping consultation in May-June 2025 sought the wider opinions of statutory consultees.

4. To promote high quality, sustainable design, reinforcing local distinctiveness and historic character.
5. To ensure that development helps to address climate change and responds to the effects of climate change.
6. To protect or enhance green spaces.
7. To enhance the environment and accessibility of the River Wensum.

What is the scope of the SEA?

The scope of the SEA is summarised in a list of topics, objectives, and assessment questions, which, taken together indicate the parameters of the SEA and provide a methodological 'framework' for assessment. A summary framework is presented below, and a full framework which includes assessment questions is provided within the main Environmental Report (see **Table 3.2**).

SEA topic	SEA objective
Air quality	Support objectives to improve air quality within and surrounding the neighbourhood area and minimise impacts on nearby Air Quality Management Areas (AQMA's).
Biodiversity and geodiversity	Protect and enhance biodiversity and geodiversity.
Climate change and flood risk	Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change.
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.
Land, soil, and water resources	Ensure the efficient and effective use of land, and protect and enhance water quality, using water resources in a sustainable manner.
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape.
Transportation	Promote sustainable transport use and active travel opportunities and reduce the need to travel.

Plan-making / SEA up to this point

An important element of the SEA process involves assessing 'reasonable alternatives' in time to inform development of the draft proposals and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, **Part 1** of the Environmental Report sets out the outline reasons for selecting 'reasonable' alternative approaches to key aspects of plan making, notably with respect to the allocation of land for housing, including alternative sites.

Specifically, **Part 1** of the report:

1. Sets out why reasonable alternatives have not been established.
2. Explains reasons for establishing the preferred option.

Why focus on sites?

The decision was taken to develop and assess reasonable alternatives in relation to the matter of supporting land for brownfield regeneration, given the following considerations:

- NOWNP aims, particularly to support high quality and sustainable regeneration, including development of brownfield sites.
- Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
- The delivery of new homes is most likely to have a significant effect compared to the other proposals within the NOWNP. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

Strategic context

The GNLP was adopted in March 2024, and is a collaborative effort by Broadland District Council, Norwich City Council, and South Norfolk Council, with support from Norfolk County Council and the Broads Authority. The plan outlines the strategic framework for growth and development in the Greater Norwich area from 2018 to 2038. It consists of three documents: 'The Strategy', 'The Sites Plan', and 'The Monitoring Framework'.

Since the adoption of the GNLP, updates to the NPPF (December 2024) set the context of significantly boosting the supply of homes across England. The updates reinstate the Five Year Housing Land Supply and establish a mandatory standard method for assessing housing need.

Responding to the changes to the NPPF, Norwich County Council have produced a note (2025) setting out the housing land supply assessment for the Greater Norwich Area. This provides an indicative housing requirement figure for the neighbourhood area of 604 homes for the GNLP period from 2018 to 2038.

The adopted GNLP allocates six sites for development, totalling 1,488 homes, and therefore significantly exceeds the 604 homes figure provided through the housing land supply assessment. Site allocation policies within the GNLP include detailed planning guidance for each site with a focus on mixed-use development. This includes the 4.8ha strategic site 'Anglia Square'.

In light of the above, the draft NOWNP does not intend to allocate sites for development. Rather, it seeks to support and enable high quality and sustainable development and regeneration of the neighbourhood area, including development of brownfield sites and the sensitive reuse of heritage assets. This is with a view to maintaining or enhancing a mixed-use neighbourhood to meet the housing, employment, recreational, educational, shopping, and other diverse needs of the local community. The emerging NOWNP also seeks to ensure that development is well designed and sustainable, reinforcing local distinctiveness and historic character; protect or enhance green spaces; enhance the environment and accessibility of the River Wensum; and promote sustainable and active travel.

Assessment of brownfield site options

In light of the above, it is considered appropriate to review the current brownfield register² to identify available brownfield sites for potential regeneration.

When discounting the brownfield sites allocated through the GNLP, as well as those which already have planning permission, this leaves only **three sites** on the brownfield register, which are:

- **Oak Street and Sussex Street commercial sites, 160-162 Oak Street** – this site comprises a pair of commercial buildings in use ('Mr Plastic'), therefore the Neighbourhood Forum have not included this site in the emerging NOWNP as the site is not currently available. If it were to come forward for brownfield regeneration, draft Policy NOW 1.2 of the emerging NOWNP sets out that “the remodelling or demolition and redevelopment of existing unlisted buildings will be supported where the existing building has a negative impact on the special architectural or historic interest or character or appearance of the Norwich City Centre Conservation Area...”.
- **St Crispins Road / Pitt Street** - this includes Pitt Street/Chatham Road, which is supported for brownfield regeneration through the emerging NOWNP. The remainder of the site comprises green space, and therefore the Neighbourhood Forum have not included this part of the site.
- **Site At Rear Of 67-69 Magdalen Street** – this site is supported for brownfield regeneration through the emerging NOWNP.

Alongside the review of the brownfield register, the Neighbourhood Forum also engaged with local landowners / promoters to establish potential availability on known brownfield sites in the neighbourhood area. In doing so, the Neighbourhood Forum identified ‘**125b Oak Street**’, which is supported for brownfield regeneration through the emerging NOWNP as it would help meeting the identified planning aims.

As the emerging NOWNP supports the regeneration of the only two available brownfield sites on the brownfield register (minus the area of green space within St Crispins Road / Pitt Street), **the SEA has not assessed sites or packages of sites as reasonable alternatives**. This also reflects that there is no unmet need to address through the Plan. However, it is noted that the NOWNP does not preclude high-quality development coming forward during the plan period at brownfield sites in the neighbourhood area as they become available.

Development of the preferred approach

The group have provided the following reasoning as to why the preferred approach has been supported through the emerging NOWNP:

“Whilst the emerging NOWNP does not allocate sites for new development, given there is no unmet need to address through the Plan, the Neighbourhood Forum recognises that speculative applications for development may come forward during the plan period. These have the potential to deliver benefits that should be secured through the design, layout and uses of each site. On this basis, the Plan’s policy framework seeks to shape development more broadly in the neighbourhood area without allocating specific sites. In this context, the Neighbourhood Forum has identified brownfield sites (as noted above) which it supports for high quality and

² Norwich City Council (no date): [Brownfield land register](#)

sustainable regeneration. This is discussed in more detail in **Chapter 8** of this Environmental Report.”

Assessment findings at this stage

Major positive effects are anticipated across the biodiversity and geodiversity; climate change and flood risk; community wellbeing; historic environment; landscape; and transportation SEA topics. This is because the policy framework suitably addresses these topics, ensuring that any development which comes forward through the Local Plan or other means does not adversely impact any of these topics, but rather protects and/or enhances them. In addition, by supporting the regeneration of underutilised brownfield sites, the draft NOWNP has the potential to deliver multiple benefits across these SEA topics.

Minor positive effects are considered likely under the air quality and land, soil and water resources SEA topics. This is largely because these topics are not a focus of the draft NOWNP. However, it is noted that air quality is indirectly addressed through the Plan, particularly through its support for active travel. Whilst water resources are briefly addressed, land and soil resources are of less relevance to the Plan given it does not allocate any sites for development.

Next steps

This Environmental Report accompanies the NOWNP for Regulation 14 consultation.

Following consultation, any representations made will be considered by the NOWNP Neighbourhood Forum, and the NOWNP and Environmental Report will be updated as necessary. The updated Environmental Report will then accompany the NOWNP for submission to the Local Planning Authority, Norwich City Council, for subsequent Independent Examination.

Following submission, the plan and supporting evidence will be published for further consultation and then subjected to Independent Examination. At Independent Examination, the NOWNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

Assuming that the examination leads to a favourable outcome, the NOWNP will then be subject to a referendum, organised by Norwich City Council. If more than 50% of those who vote agree with the NOWNP, then it will be ‘made’. Once ‘made’, the NOWNP will become part of the Development Plan for Norwich City Council, covering the defined neighbourhood area.

1. Introduction

Background

- 1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Norwich Over the Wensum Neighbourhood Plan (hereafter referred to as “the NOWNP”).
- 1.2 The NOWNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012 and in the context of the Greater Norwich Local Plan (GNLP), which was adopted in March 2024. Once ‘made’, the NOWNP will have material weight when deciding on planning applications alongside the GNLP.
- 1.3 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the NOWNP is a legal requirement.³

SEA explained

- 1.4 It is a requirement that SEA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on SEA.
- 1.5 In line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that “identifies, describes and evaluates” the likely significant effects of implementing “the plan, and reasonable alternatives”.⁴ The report must then be considered, alongside consultation responses, when finalising the plan.
- 1.6 More specifically, the report must answer the following three questions:
 1. Assessment of reasonable alternatives.
 2. What are the SEA findings at this stage? – i.e., in relation to the draft plan.
 3. What happens next?

³ Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: a) an environmental report; or b) a statement of reasons why SEA is not required, prepared following a ‘screening’ process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations (‘the SEA Regulations’). The NOWNP was subject to screening by Norwich City Council in 2024 and Scoping consultation in May-June 2025 sought the wider opinions of statutory consultees.

⁴ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

This Environmental Report

- 1.7 This report is the Environmental Report for the NOWNP. It is published alongside the 'pre-submission' version of the Plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.8 This report essentially answers questions 1, 2 and 3 above in turn, to provide the required information. Each question is answered within a discrete 'part' of the report.
- 1.9 However, before answering question 1, two initial questions are answered to further set the scene; what is the plan seeking to achieve? And what is the scope of the SEA?

2. What is the NOWNP seeking to achieve?

Introduction

2.1 This section considers the strategic planning policy context provided by the adopted GNLP, before then presenting the vision and objectives of the NOWNP. **Figure 2.1** below presents the neighbourhood area, which covers much of the area to which the Norwich City Council Northern City Centre Area Action Plan⁵ relates.



Figure 2.1 The NOWNP neighbourhood area

⁵ Norwich City Council (2010): [Northern City Centre Area Action Plan](#)

Strategic planning policy context

- 2.2 The GNLP was adopted in March 2024, and is a collaborative effort by Broadland District Council, Norwich City Council, and South Norfolk Council, with support from Norfolk County Council and the Broads Authority. The plan outlines the strategic framework for growth and development in the Greater Norwich area from 2018 to 2038. It consists of three documents: 'The Strategy', 'The Sites Plan', and 'The Monitoring Framework'.
- 2.3 Since the adoption of the GNLP, updates to the NPPF (December 2024) set the context of significantly boosting the supply of homes across England. The updates reinstate the Five Year Housing Land Supply and establish a mandatory standard method for assessing housing need.
- 2.4 Responding to the changes to the NPPF, Norwich County Council have produced a note (2025) setting out the housing land supply assessment for the Greater Norwich Area. This provides an indicative housing requirement figure for the neighbourhood area of 604 homes for the GNLP period from 2018 to 2038.
- 2.5 The adopted GNLP allocates six sites for development, totalling 1,488 homes, and therefore significantly exceeds the 604 homes figure provided through the housing land supply assessment. Site allocation policies within the GNLP include detailed planning guidance for each site with a focus on mixed-use development. This includes the 4.8ha strategic site 'Anglia Square'.
- 2.6 In light of the above, the draft NOWNP does not intend to allocate sites for development. Rather, it seeks to support and enable high quality and sustainable development and regeneration of the neighbourhood area, including development of brownfield sites and the sensitive reuse of heritage assets. This is with a view to maintaining or enhancing a mixed-use neighbourhood to meet the housing, employment, recreational, educational, shopping, and other diverse needs of the local community. The emerging NOWNP also seeks to ensure that development is well designed and sustainable, reinforcing local distinctiveness and historic character; protect or enhance green spaces; enhance the environment and accessibility of the River Wensum; and promote sustainable and active travel.

NOWNP planning aims

- 2.7 A total of seven planning aims have been identified following analysis of the neighbourhood area and outcomes from community engagement, which are:
 1. To support high quality and sustainable regeneration, including development of brownfield sites and realising the potential of the area's heritage.
 2. Maintaining a mixed neighbourhood to meet the housing, employment, recreational, educational, shopping and other diverse needs of the local community.
 3. To promote sustainable and active travel, enabling walking and cycling.
 4. To promote high quality, sustainable design, reinforcing local distinctiveness and historic character.

5. To ensure that development helps to address climate change and responds to the effects of climate change.
6. To protect or enhance green spaces.
7. To enhance the environment and accessibility of the river Wensum.

3. What is the scope of the SEA?

Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SEA, i.e., the sustainability topics and objectives that should be a focus of the assessment of the plan and reasonable alternatives. Further information, including the policy review and baseline information that has supported the development of key sustainability issues and objectives, is presented in **Appendix B**.

Consultation

- 3.2 The SEA Regulations require that “when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.⁶ Hence, these authorities were consulted from 19th May to 24th June 2025. Comments were received from all three consultees, however the Environment Agency and Natural England had no specific comments. Comments from Historic England are detailed in **Table 3.1** below.

Table 3.1 Scoping consultation responses

Consultation body	Consultation response	How the response was considered and addressed
Historic England	The Key Statistics section on p32 focusses on the neighbourhood plan area itself. It would be helpful to include a paragraph relating to the surrounding area.	Impacts to heritage assets (and their settings) which may be impacted by development within the neighbourhood area have been considered in Parts 1 and 2 of this Environmental Report.
	We welcome the assessment questions in paragraph 7.15. We recommend that the first question should be amended to read: ‘Conserve and enhance the significance of heritage assets, both designated and non-designated, and their settings?’ An additional question relating to heritage at risk should be included.	Updated, please see Table 3.2 below.

⁶ These consultation bodies were selected “by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes” (SEA Directive, Article 6(3)).

Consultation body	Consultation response	How the response was considered and addressed
	Finally, with reference to the NPPF's requirement (Paragraph 203) for a positive strategy to include consideration of heritage at risk, we would recommend that the national and local Heritage At Risk Registers are consulted to inform your baseline information. If there is a local heritage at risk register, it would be accessed via Norwich City Council.	The national and local Heritage At Risk Registers have been consulted and referenced in this report where at risk heritage assets are identified within / near the neighbourhood area.

Key sustainability issues

3.3 The key sustainability issues for the neighbourhood area, identified through scoping, are presented below under each SEA topic.

Air quality

- The neighbourhood area largely overlaps with the Central Norwich AQMA, with the exception of the northwestern corner. Whilst the AQMA did not exceed the nitrogen dioxide (NO₂) annual mean national objective in 2023, the NOWNP seeks to support the redevelopment of brownfield sites, and therefore there is potential for development in the neighbourhood area to negatively impact upon the AQMA. However, it is recognised that development in a city centre location is likely to lead to an uptake in public and active transport, rather than the use of the private car. Nevertheless, an increase in trips by private car is still possible.

Biodiversity and geodiversity

- Whilst there are no designated sites for biodiversity or geodiversity within the neighbourhood area, there are a number of sites within proximity. These include internationally, nationally, and locally designated sites. Whilst the neighbourhood area is not seeking to allocate sites for housing, the NOWNP still has the potential to impact upon these sites by supporting the redevelopment of brownfield sites in the neighbourhood area.
- The NOWNP should seek to maintain or enhance the condition of the designated sites in proximity to the neighbourhood area, particularly those located downstream which could be impacted by run off into the river, as well as those in close proximity such as the Sites of Special Scientific Interest (SSSIs). The NOWNP should also seek to positively impact designated sites in an unfavourable condition.

Climate change and flood risk

- The largest contributor to carbon dioxide (CO₂) emissions in Norwich is the domestic sector, which likely reflects the urban nature of the neighbourhood area. The NOWNP could support a reduction in emissions from the domestic sector by reducing emissions linked to households – for example, by including design principles that bolster energy efficiency. The second largest contributor to

CO₂ emissions is the transport sector. The NOWNP could seek to address emissions from transport locally through strengthening the active and sustainable travel network. This would help to reduce reliance on the private car to access key services and facilities and employment opportunities.

- The neighbourhood area is located directly adjacent to the River Wensum along its southern border, meaning that much of the southern part of the neighbourhood area is within Flood Zone 2. There is also risk of surface water flooding across the neighbourhood area. Whilst the NOWNP is not allocating sites for housing, it does support the redevelopment of brownfield sites. Therefore, it should address flood risk management, including by seeking opportunities to improve drainage through the targeted application of sustainable drainage systems (SuDS).

Community wellbeing

- With a significant proportion of the population in the 30-34 and 20-24 age groups, largely due to the presence of universities, there may be a concentration of younger, more transitory residents. This could create a demand for housing and services that are suited to students and young professionals, potentially leading to issues with housing affordability, as well as challenges in meeting the longer-term needs of more permanent residents.
- The high proportion of renters (38% private rent, 36% social rent) and the relatively low levels of homeownership (26%) suggest a housing market heavily reliant on rental properties. This could indicate challenges related to housing affordability and availability, particularly for those wishing to transition from renting to owning. There may be a need for policies or initiatives aimed at increasing affordable homeownership options or addressing the supply of suitable rental housing for both students and long-term residents.
- Currently, the neighbourhood area offers a diverse range of community infrastructure that caters to the daily needs of its residents. However, it is acknowledged that some individuals may still travel outside the neighbourhood area to access additional services or facilities, such as expanded retail options or broader employment opportunities. To address this, it will be important for the NOWNP to focus on enhancing the quality and variety of local services and facilities, ensuring that the neighbourhood area can continue to meet the evolving needs of its residents, whilst minimising the need to travel outside for additional retail, employment, or leisure opportunities.
- Whilst the neighbourhood area has improved in its overall Index of Multiple Deprivation (IMD) ranking since 2015, part of the neighbourhood area still remains in the top 10% of the most deprived areas. Continued efforts are needed to address the broader social and economic factors contributing to this deprivation, with a particular focus on improving employment opportunities, education, and reducing crime.

Historic environment

- One designated feature within the neighbourhood area is included on the 2024 Heritage at Risk Register, published by Historic England. The register indicates that no solution or strategy has been agreed in order to improve their status. The NOWNP presents an opportunity to better understand the local historic

environment in the neighbourhood area, including a better understanding over how to protect and enhance these important features.

- The City Centre Conservation Area has an associated character appraisal that is detailed and intricate in nature, and outlines its importance, identifying structures and features that contribute to its historic setting and significance. Further, the character appraisal presents management and enhancement strategies and solutions to be implemented to improve the nature and setting of these historical assets. The NOWNP presents an opportunity to maintain and enhance these assets and implement these strategies.
- The local list for Norwich (within conservation areas) highlights a large number of assets, mainly in the way of residential buildings with historical value, within the neighbourhood area – as is to be expected with the neighbourhood area entirely within the conservation area. The NOWNP presents an opportunity to recognise and protect these locally important assets.

Land, soil, and water resources

- Due to the urban location of the neighbourhood area, it is unlikely that new development through the NOWNP will lead to any adverse impacts on soil resources. This is because the neighbourhood area is primarily in 'urban' or 'urban / industrial use'; previously / currently developed land with little potential to be of high agricultural quality.
- According to the latest brownfield land register for Norwich City, there are 15 brownfield sites within the neighbourhood area. These sites promote opportunities to focus development on sites within the existing built-up area. In this respect, the NOWNP should consider issues such as land remediation.
- The neighbourhood area sits within a number of water protection zones, which means that the NOWNP should ensure that development is designed to minimise pollution risks, particularly from nitrates and other pollutants, to protect drinking water resources. Water management practices, including SuDS and pollution control measures, will be important to ensure compliance with environmental safeguards and long-term water resource resilience.

Landscape

- The southern boundary of the neighbourhood area is adjacent to the Broads National Park. As such, the redevelopment of brownfield sites – which the NOWNP seeks to support – could impact on the setting and significance of this National Park. Due to this, the NOWNP should consider how future development could impact the National Park, and set out how this could be mitigated, for example through the design and layout of development.
- The neighbourhood area sits within a diverse landscape, including across two National Character Areas (NCAs). As such, development will need to be considerate of the varying landscape features and sensitivities. The NOWNP has the potential to positively contribute to landscape amenity through encouraging development to integrate with the various national and local landscape characters. This will maintain the unique landscape value of the neighbourhood area.

Transportation

- There are good opportunities to engage with sustainable and public transportation in the neighbourhood area given its urban location. There are a number of bus services that travel through Norwich Over the Wensum, and a railway station is within walking distance (and also accessible by public transport). As such, it is likely that new development through the NOWNP will not promote additional private vehicle usage for local journeys.
- 10.9 Whilst much of the working population of the neighbourhood area travel less than 10km to their workplace (primarily by foot), a large proportion work from home. The NOWNP could encourage a further uptake in working from home by encouraging infrastructure enhancements, such as improved internet connections and shared working spaces.

The SEA framework

- 3.4 The SEA scope is summarised in a list of topics, objectives, and assessment questions, known as the SEA framework. These draw on the key sustainability issues identified through scoping. **Table 3.2** below presents the SEA framework.

Table 3.2 SEA framework

SEA topic	SEA objective	Supporting assessment questions
Air quality	Support objectives to improve air quality within and surrounding the neighbourhood area and minimise impacts on nearby AQMAs.	• Support the sustainable redevelopment of brownfield sites to minimise emissions associated with development, including through best practice dust and emissions control? • Limit traffic and congestion, and associated vehicle emissions, through effective land use planning? • Promote and encourage active and sustainable transport options where appropriate? • Encourage development which reduces the need to travel? • Implement measures (such as green infrastructure) which will help to support good air quality in the neighbourhood area?
Biodiversity and geodiversity	Protect and enhance biodiversity and geodiversity.	• Protect and enhance internationally, nationally and locally designated sites for biodiversity and geodiversity in proximity to the neighbourhood area, including by supporting the maintenance and/or improvement of their condition and the habitats and species within these sites? • Protect and enhance semi-natural habitats, as well as priority habitats and

SEA topic	SEA objective	Supporting assessment questions
		species, supporting the integrity of ecological networks? • Achieve biodiversity and environmental net gains and support the delivery of ecosystem services and multifunctional green infrastructure networks? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks? • Support access to, interpretation of, and understanding of biodiversity and geodiversity?
Climate change and flood risk	Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change.	• Avoid vulnerable development in areas of elevated flood risk? • Reduce the number of journeys made and reduce the need to travel? • Promote the use of more sustainable modes of transport, including walking, cycling, public transport, and electric vehicle (EV) infrastructure? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources, or reduce energy consumption from non-renewable resources? • Improve and extend green infrastructure networks in the neighbourhood area? • Sustainably manage water runoff, and reduce runoff where possible? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.	• Provide everyone with the opportunity to live in good quality, affordable housing? • Support the provision of a range of house types and sizes? • Meet the needs of all sectors of the community? • Provide flexible and adaptable homes that meet people's needs, particularly the needs of an ageing population? • Improve upon the deprivation domains in the area?

SEA topic	SEA objective	Supporting assessment questions
		• Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Encourage and promote social cohesion and active involvement of local people in community activities? • Facilitate green infrastructure enhancements, including improved access to open space? • Maintain or enhance the quality of life for all residents?
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.	• Conserve and enhance the significance of heritage assets, both designated and non-designated, and their settings? • Protect the integrity of the historic setting of the City Centre Conservation Area, considering and implementing where possible advice from the Conservation Area Appraisal? • Conserve and enhance the special interest, character and appearance of locally important features and their settings? • Protect the integrity of the historic setting of key monuments of cultural heritage interest as listed in the Norfolk County Council Historic Environment Record (HER)? • Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies? • Support improvements to heritage assets listed on national and local Heritage At Risk Registers? • Support access to, interpretation and understanding of the historic evolution and character of the neighbourhood area?
Land, soil, and water resources	Ensure the efficient and effective use of land, and protect and enhance water quality, using water resources in a sustainable manner.	• Promote the use of previously developed land wherever possible? • Support the minimisation, reuse, and recycling of waste? • Avoid any negative impacts on water quality and support improvements to water quality?

SEA topic	SEA objective	Supporting assessment questions
		• Ensure appropriate drainage and mitigation is delivered alongside proposed development? • Protect waterbodies from pollution? • Maximise water efficiency and opportunities for water harvesting and/or water recycling? • Avoid any negative impacts on waste infrastructure?
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape.	• Protect and / or enhance designated landscape within and in proximity to the neighbourhood area, and align with the associated Broads Plan where possible? • Protect and enhance the local landscape and townscape character and quality of place? • Conserve and enhance local identity, diversity, and settlement character? • Identify and protect locally important viewpoints which contribute to character and sense of place?
Transportation	Promote sustainable transport use and active travel opportunities and reduce the need to travel.	• Support the objectives within the Norfolk County Council Local Transport Plan 4, including to encourage the use of more sustainable transport modes where appropriate? • Encourage a shift to more sustainable forms of travel and enable sustainable transport infrastructure enhancements? • Improve local connectivity and pedestrian and cyclist movement? • Facilitate working from home to reduce the use of private vehicles to access workplaces outside of the neighbourhood area? • Reduce the impact of the transport sector on climate change?

Part 1: Assessment of reasonable alternatives

4. Introduction (to Part 1)

Overview

- 4.1 Whilst work on the NOWNP has been underway for some time, the aim here is not to provide a comprehensive explanation of all the work carried out to date, but rather to explain work undertaken to develop and appraise reasonable alternatives through the SEA process.
- 4.2 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the NOWNP, namely the allocation of land for housing, or alternative sites.

Why focus on sites?

- 4.3 The decision was taken to develop and assess reasonable alternatives in relation to the matter of supporting land for brownfield regeneration, given the following considerations:
- NOWNP aims, particularly to support high quality and sustainable regeneration, including development of brownfield sites.
 - Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
 - The delivery of new homes is most likely to have a significant effect compared to the other proposals within the NOWNP. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

Structure of this part of the report

- 4.4 This part of the report is structured as follows:
- **Chapter 5 and Chapter 6** – discuss the options appraised as reasonable alternatives, and the findings of the appraisal of these options.
 - **Chapter 7** – explains reasons for selecting the preferred option, considering the appraisal.

5. Exploring reasonable alternatives

Introduction

- 5.1 This chapter explores reasonable alternatives through the SEA process. The assessment comprises a consideration of brownfield site options.

Strategic parameters

- 5.2 As discussed in **Chapter 2**, the GNLP (adopted in March 2024) outlines the strategic framework for growth and development in the Greater Norwich area from 2018 to 2038. It consists of three documents: 'The Strategy', 'The Sites Plan', and 'The Monitoring Framework'.
- 5.3 Since the adoption of the GNLP, updates to the NPPF (December 2024) set the context of significantly boosting the supply of homes across England. The updates reinstate the Five Year Housing Land Supply and establish a mandatory standard method for assessing housing need.
- 5.4 Responding to the changes to the NPPF, Norwich County Council have produced a note (2025) setting out the housing land supply assessment for the Greater Norwich Area. This provides an indicative housing requirement figure for the neighbourhood area of 604 homes for the GNLP period from 2018 to 2038.
- 5.5 The adopted GNLP allocates six sites for development, totalling 1,488 homes, and therefore significantly exceeds the 604 homes figure provided through the housing land supply assessment. Site allocation policies within the GNLP include detailed planning guidance for each site with a focus on mixed-use development. This includes the 4.8ha strategic site 'Anglia Square'.
- 5.6 In light of the above, the draft NOWNP does not intend to allocate sites for development. Rather, it seeks to support and enable high quality and sustainable development and regeneration of the neighbourhood area, including development of brownfield sites and the sensitive reuse of heritage assets. This is with a view to maintaining or enhancing a mixed-use neighbourhood to meet the housing, employment, recreational, educational, shopping, and other diverse needs of the local community. The emerging NOWNP also seeks to ensure that development is well designed and sustainable, reinforcing local distinctiveness and historic character; protect or enhance green spaces; enhance the environment and accessibility of the River Wensum; and promote sustainable and active travel.

Consideration of brownfield site options

- 5.7 Considering the above, it is considered appropriate to review the current brownfield register to identify available brownfield sites which could be supported through the emerging NOWNP for regeneration.
- 5.8 When discounting the brownfield sites allocated through the GNLP, as well as those which already have planning permission, this leaves only **three sites**, which are:

- **Oak Street and Sussex Street commercial sites, 160-162 Oak Street** – this site comprises a pair of commercial buildings in use ('Mr Plastic'), therefore the Neighbourhood Forum have not included this site in the emerging NOWNP as the site is not currently available. If it were to come forward for brownfield regeneration, Policy NOW1 (Regeneration) of the emerging NOWNP sets out that “the remodelling or demolition and redevelopment of existing unlisted buildings will be supported where the existing building has a negative impact on the special architectural or historic interest or character or appearance of the Norwich City Centre Conservation Area...”.
- **St Crispins Road / Pitt Street** – this includes Pitt Street/Chatham Road, which is supported for brownfield regeneration through the emerging NOWNP. The remainder of the site comprises green space, and therefore the Neighbourhood Forum have not included this part of the site.
- **Site At Rear Of 67-69 Magdalen Street** – this site is supported for brownfield regeneration through the emerging NOWNP.

5.9 Alongside the review of the brownfield register, the Neighbourhood Forum also engaged with local landowners / promoters to establish potential availability on known brownfield sites in the neighbourhood area. In doing so, the Neighbourhood Forum identified **125b Oak Street**, which is supported for brownfield regeneration through the emerging NOWNP. This is because it would help meet the aims identified through the Plan (see **Chapter 2**).

5.10 As the emerging NOWNP supports the regeneration of the only two available brownfield sites on the brownfield register (minus the area of green space within St Crispins Road / Pitt Street), **the SEA has not assessed sites or packages of sites as reasonable alternatives.**

5.11 This also reflects that there is no unmet housing need to address through the Plan. However, it is noted that the NOWNP does not preclude high-quality development coming forward during the plan period at brownfield sites in the neighbourhood area as they become available. Specifically, Policies NOW1 (Regeneration) and NOW2 (Residential Development) of the draft NOWNP support and enable high quality and sustainable development and regeneration of the neighbourhood area, including development of brownfield sites and the sensitive reuse of heritage assets. These policies are explored in more detail in **Chapter 8** of this report.

6. Preferred approach for the Neighbourhood Plan

- 6.1 The group have provided the following reasoning as to why the preferred approach has been supported through the emerging NOWNP:

“Whilst the emerging NOWNP does not allocate sites for new development, given there is no unmet need to address through the Plan, the Neighbourhood Forum recognises that speculative applications for development may come forward during the plan period. These have the potential to deliver benefits that should be secured through the design, layout and uses of each site. On this basis, the Plan’s policy framework seeks to shape development more broadly in the neighbourhood area without allocating specific sites. In this context, the Neighbourhood Forum has identified brownfield sites (as noted above) which it supports for high quality and sustainable regeneration. This is discussed in more detail in **Chapter 8** of this Environmental Report.”

Part 2: What are the SEA findings at this stage?

7. Introduction (to Part 2)

Overview

7.1 The aim of this part of the Environmental Report is to present appraisal findings and recommendations in relation to the current Regulation 14 ‘pre-submission’ version of the NOWNP. This chapter presents:

- An appraisal of the current version of the NOWNP under the eight SEA topic headings; and
- The overall conclusions at this current stage and recommendations for the next stage of plan-making.

NOWNP policies

7.2 The six policies within the NOWNP are outlined in **Table 7.1** below.

Table 7.1 NOWNP policies

Policy reference	Policy name
NOW1	Regeneration
NOW2	Residential Development
NOW3	Heritage, Character and Identity
NOW4	Sustainable Urban Design
NOW5	Green and Blue Infrastructure
NOW6	Sustainable and Active Travel

Methodology

- 7.3 The assessment identifies and evaluates ‘likely significant effects’ on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.2**) as a methodological framework.
- 7.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 7.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the NOWNP to impact an aspect of the baseline when

implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the assessment as appropriate.

8. Assessment of the plan

Introduction

- 8.1 The assessment is presented below under eight topic headings, reflecting the established assessment framework (see **Section 3**). A final section (**Chapter 9**) then presents overall conclusions.

Plan contents, aims, and objectives

- 8.2 Policies NOW1 (Regeneration) and NOW2 (Residential Development) of the draft NOWNP address regeneration and living and working. Specifically, they support and enable high quality and sustainable development and regeneration of the neighbourhood area, including development of brownfield sites and the sensitive reuse of heritage assets. These policies seek to maintain or enhance a mixed-use neighbourhood to meet the housing, employment, recreational, educational, shopping, and other diverse needs of the local community.
- 8.3 Policies that focus on design and environment include NOW3 (Heritage, Character and Identity), NOW4 (Sustainable Urban Design), and NOW5 (Green and Blue Infrastructure). These policies seek to ensure that development is well designed and sustainable, reinforcing local distinctiveness and historic character. They also seek to protect or enhance green spaces, as well as enhance the environment and accessibility of the River Wensum.
- 8.4 Finally, infrastructure is addressed through policy NOW6 (Sustainable and Active Travel), which seeks to promote sustainable and active travel.

Air quality

- 8.5 Whilst none of the policies within the draft NOWNP focus specifically on air quality, the policy framework more broadly supports improvements to walking and cycling and public transport infrastructure. In doing so, the Plan indirectly supports improvements to air quality by making active travel and public transport more attractive options. This should help reduce emissions associated with vehicular movement in the neighbourhood area.
- 8.6 In addition to the above, the draft NOWNP supports the retention and planting of trees and hedges, as well the creation and enhancement of green corridors and links between green space (e.g. through Policy NOW5 (Green and Blue Infrastructure)). This could contribute to improving air quality locally by increasing the cover of vegetation across the neighbourhood area, thereby increasing the amount of air pollutants absorbed by vegetation.
- 8.7 A notable policy in this respect is Policy NOW6 (Sustainable and Active Travel), which sets out that development likely to generate additional journeys should meet the travel needs of the neighbourhood area's diverse population, including people who use sustainable forms of transport or participate in active travel.
- 8.8 In light of the above, the provisions made in the draft NOWNP are considered likely to lead to **minor positive effects** on air quality locally.

Biodiversity and geodiversity

- 8.9 Biodiversity is primarily addressed through two policies within the draft NOWNP. The first is Policy NOW4 (Sustainable Urban Design), which sets out that development should support biodiversity, taking account of the Green Guidance Note included in the draft NOWNP. Specifically, the Note highlights that landscape design features could include native species in planting. Policy NOW4 also supports lighting schemes that require planning permission, providing lighting units are sensitively designed and discretely located. This is important given lighting, particularly at night, can interfere with the activities and physiology of many species, most notably nocturnal species.
- 8.10 The other policy of note to this SEA topic is Policy NOW5 (Green and Blue Infrastructure), which outlines that development of sites next to the River Wensum should retain any mature trees and hedges and complement and take opportunities to enhance the biodiversity of the river and its environs. Adding to this, the policy states that mature trees, groups of trees, and hedges should be retained where possible and should be incorporated into the design and layout of the scheme. Steps should be taken to protect them and their roots during construction, and where loss is unavoidable, replacement trees and/or hedges should be provided. This should be of a similar species or other species with high environmental value, to provide a similar or enhanced level of biodiversity.
- 8.11 Policy NOW5 also sets out that development should take opportunities to enhance green and blue infrastructure and support wildlife habitats and connectivity. This includes, where appropriate, a) incorporating landscape design with habitat value; b) planting in gaps between existing hedgerows and trees; and c) creating or enhancing green corridors and links between green spaces. These measures will all help reduce habitat fragmentation and contribute to improved ecological connectivity across the neighbourhood area.
- 8.12 Overall, the draft NOWNP is anticipated to lead to **major positive effects** for biodiversity locally. The policy framework considers measures to improve biodiversity in detail. Whilst the Plan does not allocate any sites for development, it supports the regeneration of brownfield sites. Due to the requirement for development proposals to deliver at least 10% biodiversity net gain (BNG), this is anticipated to lead to new development areas which contribute positively to the biodiversity of the neighbourhood area.

Climate change and flood risk

- 8.13 In terms of climate change mitigation, Policy NOW4 (Sustainable Urban Design) supports the use of recycled materials and construction methods that minimise carbon use. This will contribute positively towards reducing the embodied carbon associated with new development. Adding to this, Policy NOW4 states that development should include positive design features to reduce carbon impacts, taking account of the Green Guidance Note included within the draft NOWNP. The Note outlines that when redeveloping buildings, the durability and embodied energy of materials should be carefully considered, as well as the use of local, recycled, and recyclable materials. Spoil should be retained on-site and incorporated into the redevelopment where possible.
- 8.14 The Note also sets out that building specifications could include efficient heating and cooling systems; insulation and airtightness; orientation of windows

to take account of solar gain; natural ventilation and air flow; green walls or roofs; and flexible internal spaces to accommodate changing demands. These measures will all help reduce the operational emissions of new development areas. In addition, the note highlights that micro and local energy generation could be incorporated into development, including local renewable energy schemes (e.g. ground heat pumps, photovoltaics, and biomass) and micro and domestic energy generation, such as rooftop photovoltaics.

- 8.15 Finally, the Note encourages compliance with BREEAM or other environmental standards. In this respect, the policy framework of the draft Plan performs well by ensuring new development areas meet globally recognised standards.
- 8.16 In terms of climate change adaptation, Policy NOW4 outlines that development should include sustainable drainage as an integral part of the design, and hard surfaced areas should use water permeable materials where possible. Adding to this, the Green Guidance Note also highlights that landscape design features could include rainwater capture, storage and reuse; rain gardens; sustainable urban drainage; and permeable materials for hard surfaced areas.
- 8.17 Overall, the draft NOWNP is anticipated to lead to **major positive effects** for climate change and flood risk. The policy framework considers measures to improve both the embodied and operational carbon emissions associated with new development in detail. It also supports the regeneration of brownfield sites, which is generally associated with reduced environmental impact than greenfield development.⁷ It is considered that any development which comes forward in the neighbourhood area through Local Plan allocations will be located in areas that are not at risk of flooding, and where this is not possible, the sequential test, and if necessary, the exception test will be utilised.

Community wellbeing

- 8.18 The draft NOWNP does not allocate any sites for development as the indicative housing requirement figure for the neighbourhood area – 604 homes – is more than adequately covered by the sites allocated through the GNLP, or with extant planning permission within the neighbourhood area. However, Policy NOW1 (Regeneration) supports the redevelopment of brownfield sites to provide commercial and workspace (Use Class E); live/work units; residential accommodation; creative and cultural uses; educational facilities; community facilities; or other uses that are appropriate to the site and context and would complement the existing mix of uses in the area. This is subject to a) there being no conflict with existing adjoining or nearby uses; and b) there being no significant adverse impact on the amenities of nearby residential properties. Adding to this, Policy NOW1 highlights that existing manufacturing and industrial uses (Use Classes E and B2) should be retained where possible.
- 8.19 Policy NOW1 supports development in the Large District Centre (as defined in the Local Plan), including reuse of upper floors, subject to it a) maintaining or enhancing its vitality and viability as a district centre and focus for retail, employment, and community facilities; b) providing retail, commercial or other town centre uses for ground floor street frontages units where possible; and c) there being no significant adverse impact on the amenities of nearby residential properties. The supporting text for Policy NOW1 highlights that Anglia Square is

⁷ CBRE (2024): [Brownfield development and the implications of net-land-take targets](#)

the main redevelopment opportunity within the neighbourhood area and the Large District Centre. A scheme of exceptional quality would be expected, meeting the requirements of the policies set out within the NOWNP.

- 8.20 In terms of housing mix and tenure, Policy NOW2 (Residential Development) outlines that residential development should include a mix of accommodation, based on the latest available evidence of need, to meet the diverse and changing needs of the population, including older people or people with limited mobility / impaired vision / other disabilities. In addition, Policy NOW2 sets out that any affordable housing provision should be designed as an integral part of the scheme, to a similar specification as market housing, so that it is tenure blind. In doing so this policy supports equality and inclusion.
- 8.21 With a focus on design, Policy NOW4 (Sustainable Urban Design) states that development should create a high-quality public realm and provide a safe, convenient, and attractive environment for pedestrians. This includes (but is not limited to) taking opportunities to create attractive new urban or green spaces to support recreation, social interaction, and other community or economic activities. This is in addition to providing active frontages with doors, windows or other features which facilitate natural surveillance of streets and spaces. Development should also cater for the needs of older people and people with limited mobility or visual impairment or other disabilities.
- 8.22 Policy NOW4 also highlights that housing should have screened storage space for bins and recycling, where possible located away from the public realm. In addition, servicing areas for commercial development should be located and screened to minimise adverse visual impacts on the public realm and street scene. These small measures will contribute to maintaining the sense of place of the neighbourhood area, including residents' pride for the area.
- 8.23 Finally, Policy NOW5 (Green and Blue Infrastructure) states that development within Gildencroft Park will be supported where it is directly related to the recreational use, maintenance or management of the park. The policy also highlights that development affecting parks, green spaces, or play areas should not harm, and should take opportunities to enhance, their accessibility, amenity and safety. This is important given public green spaces contribute to the health and wellbeing of communities by promoting good physical and mental health. They do this by providing a space for recreational activities and conversation between residents, as well as by connecting people with nature.
- 8.24 Overall, the draft NOWNP is anticipated to lead to **major positive effects** for community wellbeing. Whilst it does not allocate any sites for residential development or employment uses, it supports the regeneration of brownfield sites to support the vitality, role and function of the town centre environment. In addition, the policy framework seeks to ensure that any future development contributes to a high-quality public realm, including by improving active travel infrastructure, delivering safe and inclusive environments, and protecting or enhancing green spaces. This is in addition to protecting existing employment uses which contribute to the vitality of the neighbourhood area.

Historic environment

- 8.25 The protection and enhancement of heritage assets is a strong focus of the draft NOWNP. Policy NOW1 (Regeneration) supports the remodelling or

demolition and redevelopment of existing unlisted buildings where the existing building has a negative impact on the special architectural / historic interest or character / appearance of the Norwich City Centre Conservation Area. This is subject to a) the proposed scheme being designed to a high standard, to preserve or enhance the character / appearance of the conservation area; and b) there being no significant adverse impact on the amenities of nearby residential properties. Policy NOW1 also supports the reuse and creative adaptation and improvement of historic buildings, including works to improve energy efficiency. This is subject to the scheme being sensitively designed and preserving or enhancing a) the special architectural or historic interest and setting of listed buildings; and/or b) for unlisted buildings, preserving or enhancing the character or appearance of the conservation area.

- 8.26 Policy NOW3 (Heritage, Character and Identity) states that development should be designed for the specific site and context to reinforce the neighbourhood area's locally distinctive sense of place and to complement the surrounding townscape character in terms of height, scale, massing, and the relationship of frontages to surrounding streets and spaces. Development should also complement the character and appearance of the conservation area, including (but not limited to) townscape character; architectural quality and diversity; surviving sections of the historic City wall; historic churches and their churchyard settings; and the varied palette of materials.
- 8.27 In relation to the above, Policy NOW3 states that development should take opportunities to preserve or enhance a) surviving sections of the historic City wall; and b) historic churches as key historic landmarks and their churchyard settings as key historic spaces, including walls, gates, graves and trees.
- 8.28 Policy NOW3 outlines that historic shopfronts or surviving parts of historic shopfronts should be retained, including where ground floor frontage units change to non-commercial uses, and where historic shopfronts have been removed previously their reinstatement will be supported. The protection of important views is also addressed through Policy NOW3; specifically, that development should take opportunities to maintain or enhance views towards historic landmarks, including the church towers and spires. Moreover, the policy sets out that signage should be designed sensitively for the specific building or location, to complement the character or appearance of the conservation area.
- 8.29 Finally, Policy NOW3 supports extensions or alterations to historic buildings where a) the quality of the scheme is appropriate to the sensitivity of the building and its context within the conservation area; b) any extension complements the existing building in its form, massing and quality of materials; and c) the scheme avoids obliterating or destroying any features that contribute to the special architectural or historic interest of listed buildings and/or the character or appearance of the conservation area.
- 8.30 Also of relevance is Policy NOW4 (Sustainable Urban Design), which states that development should preserve or enhance the character or appearance of the conservation area. It also sets out that development should be constructed using high quality and durable materials to preserve or enhance the character or appearance of the conservation area. Support will be given to the use of traditional and local materials (amongst other considerations). In addition, Policy NOW5 (Green and Blue Infrastructure) states that development within

Gildencroft Park will be supported where it is designed to preserve or enhance the green, open, landscape and historic character of the park.

- 8.31 Overall, the draft NOWNP is predicted to lead to **major positive effects** for the historic environment. Whilst the Plan does not allocate any sites for development, the policies provide a robust framework for ensuring that any development which may come forward via other means does not adversely impact the setting or significance of any heritage assets, including the conservation area and those assets within it, but rather enhances the historic environment. In addition, the Plan supports the remodelling or demolition and redevelopment of existing unlisted buildings which detract from the historic environment; sensitively designed development; the protection of important views; and the use of high quality materials (amongst other considerations).

Land, soil, and water resources

- 8.32 By supporting the regeneration of brownfield sites, the draft NOWNP supports the most efficient use of land in the neighbourhood area. However, it is recognised that given the urban nature of the neighbourhood area, in the middle of a city centre, greenfield site opportunities are relatively limited.
- 8.33 With regard to water resources, Policy NOW5 (Green and Blue Infrastructure) outlines that development of sites next to the River Wensum should not cause or lead to any deterioration in water quality. This will be bolstered by both local and national planning policy.
- 8.34 In light of the above, the provisions made in the draft NOWNP are considered likely to lead to **minor positive effects** on land, soil and water resources.

Landscape

- 8.35 Landscape and townscape considerations are addressed through several policies within the draft NOWNP. To begin with, Policy NOW3 (Heritage, Character and Identity) sets out that development should complement the character and appearance of the Norwich City Centre Conservation Area, including (but not limited to) the pattern of public or semi-public green spaces, including parks and trees; groups of trees and greenery; and the river and its green environs. This will ultimately positively contribute towards the townscape character of this part of the city.
- 8.36 In addition, Policy NOW4 (Sustainable Urban Design) states that development should create a high-quality public realm. This includes (but is not limited to) incorporating high-quality landscape design as an integral part of the scheme, including planting of hedges and garden and street trees. The policy also supports lighting schemes that require planning permission, providing lighting units are sensitively design and discretely located. A Green Guidance Note is included under Policy NOW4; this sets out that landscape design features could include traditional hedges for boundary treatment and green screens to screen servicing or parking areas. This will improve the streetscape of these areas.
- 8.37 Policy NOW5 (Green and Blue Infrastructure) outlines that development of sites next to the River Wensum should be designed to enhance the river setting. This can be achieved through their layout and design, as well as the orientation of buildings and landscaping elements. Development sites should also retain any

mature trees and hedges and complement and take opportunities to enhance the green and natural character of the river and its environs.

- 8.38 Adding to the above, Policy NOW5 states that mature trees, groups of trees, and hedges should be retained where possible and should be incorporated into the design and layout of the scheme. Steps should be taken to protect them and their roots during construction, and where loss is unavoidable, replacement trees and/or hedges should be provided. This should be of a similar species or other species with high environmental value, to provide a similar or enhanced level of amenity. Moreover, Policy NOW5 states that development within Gildencroft Park will be supported where it is designed to preserve or enhance the green, open, landscape and historic character of the park.
- 8.39 Overall, the draft NOWNP is anticipated to lead to **major positive effects** for landscape character. Whilst the Plan does not allocate any sites for development, it supports the regeneration of brownfield sites which provides an opportunity to enhance landscape / townscape character in these locations. In addition, the policy framework seeks to ensure that future development complements the character and appearance of the conservation area; creates a high quality public realm; enhances the setting of the River Wensum; and protects and enhances green infrastructure (amongst other considerations). All of the elements play a crucial role in their contribution to landscape / townscape character.

Transportation

- 8.40 Transportation is considered throughout the draft NOWNP. Policy NOW1 (Regeneration) supports the development of surface car parks for other purposes set out in Clause 1 of the policy subject to a) evidence indicating that such parking provision is no longer required; b) if parking provision is still required, the redevelopment includes a similar number of vehicle parking spaces within or adjacent to the scheme; and c) there being no significant adverse impact on the amenities of nearby residential properties. Policy NOW1 also supports development of the space under the St Crispin's Road Flyover to provide market stalls; recreational or cultural spaces; active travel facilities; or other activities to complement the Large District Centre. This is subject to a) safe access and serving being provided; and b) any structures being temporary and removeable to allow access for highway maintenance works, if required.
- 8.41 Policy NOW3 (Heritage, Character and Identity) sets out that development should complement the character and appearance of the Norwich City Centre Conservation Area, including pedestrian access routes through and between buildings linking to rear yards or other streets. Adding to this, Policy NOW4 (Sustainable Urban Design) states that development should provide a safe, convenient and attractive environment for pedestrians. This includes creating connections to existing pedestrian routes and green infrastructure, as well as taking opportunities to enhance the permeability of the surrounding area. Moreover, Policy NOW5 (Green and Blue Infrastructure) outlines that development of sites next to the River Wensum should provide public access and a path to the river frontage, with ungated links to existing sections of the Riverside Walk where possible. The SEA supports these policy provisions.
- 8.42 Policy NOW6 (Sustainable and Active Travel) sets out that development likely to generate additional journeys should meet the travel needs of the

neighbourhood area's diverse population, including people who use sustainable forms of transport or participate in active travel. Policy NOW6 also states that development should promote active travel by a) providing secure and covered storage space for cycles and other person vehicles, with electrical charging outlets; b) creating safe and convenient connections to existing pedestrian and cycle routes and public transport routes, and taking opportunities to enhance pedestrian and cycle permeability; and c) catering for the needs of older people and people with limited mobility / visual impairment / other disabilities.

- 8.43 In addition to the above, Policy NOW6 outlines that vehicular access, circulation, servicing and parking in development schemes should have no adverse impacts on the safety, amenity or convenience of pedestrians and cyclists. In this respect, the draft NOWNP prioritises active travel.
- 8.44 The draft NOWNP sets out priorities in the use of Section 106, Community Infrastructure Levy, or other planning infrastructure monies. This includes the provision of new cycle routes to link existing routes; improvement of pedestrian facilities, including for people with limited mobility; improvements to the river walk; and improvements to the public realm and public spaces.
- 8.45 Overall, the draft NOWNP is anticipated to lead to **major positive effects** for transportation. Whilst the Plan does not allocate any sites for development, the policy framework has a strong focus on supporting active travel improvements and improved accessibility. This will encourage residents to utilise public and active modes of transport, thereby reducing traffic and congestion in the neighbourhood area whilst simultaneously promoting healthier lifestyles. The Plan also supports pedestrian safety, which will further encourage walking.

9. Conclusions and recommendations

Conclusions

- 9.1 **Minor positive effects** are anticipated for the air quality SEA topic. This is because the policy framework supports improvements to walking and cycling and public transport infrastructure, as well as green infrastructure, which will both contribute to reduced levels of pollution in the neighbourhood area.
- 9.2 **Major positive effects** are considered likely for the biodiversity and geodiversity SEA topic. The policy framework considers measures to improve biodiversity in detail. Whilst the Plan does not allocate any sites for development, it supports the regeneration of brownfield sites. Due to the requirement for development proposals to deliver at least 10% BNG, this is anticipated to lead to new development areas which contribute positively to the biodiversity of the neighbourhood area.
- 9.3 **Major positive effects** are also predicted for the climate change and flood risk SEA topic. The policy framework considers measures to improve both the embodied and operational carbon emissions associated with new development in detail. It also supports the regeneration of brownfield sites, which is generally associated with reduced environmental impact than greenfield development.⁸ It is considered that any development which comes forward in the neighbourhood area through Local Plan allocations will be located in areas that are not at risk of flooding, and where this is not possible, the sequential test, and if necessary, the exception test will be utilised.
- 9.4 **Major positive effects** are anticipated for the community wellbeing SEA topic as well. Whilst it does not allocate any sites for residential development or employment uses, it supports the regeneration of brownfield sites to support the vitality, role and function of the town centre environment. In addition, the policy framework seeks to ensure that any future development contributes to a high-quality public realm, including by improving active travel infrastructure, delivering safe and inclusive environments, and protecting or enhancing green spaces. This is in addition to protecting existing employment uses which contribute to the vitality of the neighbourhood area.
- 9.5 **Major positive effects** are also noted under the historic environment SEA topic. Whilst the Plan does not allocate any sites for development, the policies provide a robust framework for ensuring that any development which may come forward via other means does not adversely impact the setting or significance of any heritage assets, including the conservation area and those assets within it, but rather enhances the historic environment. In addition, the Plan supports the remodelling or demolition and redevelopment of existing unlisted buildings which detract from the historic environment; sensitively designed development; the protection of important views; and the use of high quality materials (amongst other considerations).
- 9.6 **Minor positive effects** are considered likely for the land, soil and water resources SEA topic. By supporting the regeneration of brownfield sites, the

⁸ CBRE (2024): [Brownfield development and the implications of net-land-take targets](#)

draft NOWNP supports the most efficient use of land in the neighbourhood area. In addition, the policy framework seeks to protect the River Wensum.

- 9.7 **Major positive effects** are predicted for the landscape SEA topic. Whilst the Plan does not allocate any sites for development, it supports the regeneration of brownfield sites which provides an opportunity to enhance landscape / townscape character in these locations. In addition, the policy framework seeks to ensure that future development complements the character and appearance of the conservation area; creates a high quality public realm; enhances the setting of the River Wensum; and protects and enhances green infrastructure (amongst other considerations). All of the elements play a crucial role in their contribution to landscape / townscape character.
- 9.8 **Major positive effects** are considered likely for the transportation SEA topic. Whilst the Plan does not allocate any sites for development, the policy framework has a strong focus on supporting active travel improvements and improved accessibility. This will encourage residents to utilise public and active modes of transport, thereby reducing traffic and congestion in the neighbourhood area whilst simultaneously promoting healthier lifestyles. The Plan also supports pedestrian safety, which will further encourage walking.

Recommendations

- 9.9 The SEA has no specific recommendations at this stage.

Part 3: What are the next steps?

10. Next steps

Overview

10.1 This part of the report explains the next steps that will be taken as part of plan-making and SEA.

Plan finalisation

10.2 This Environmental Report accompanies the NOWNP for Regulation 14 consultation.

10.3 Following consultation, any representations made will be considered by the NOWNP Neighbourhood Forum, and the NOWNP and Environmental Report will be updated as necessary. The updated Environmental Report will then accompany the NOWNP for submission to the Local Planning Authority, Norwich City Council, for subsequent Independent Examination.

10.4 Following submission, the plan and supporting evidence will be published for further consultation and then subjected to Independent Examination. At Independent Examination, the NOWNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

10.5 Assuming that the examination leads to a favourable outcome, the NOWNP will then be subject to a referendum, organised by Norwich City Council. If more than 50% of those who vote agree with the NOWNP, then it will be 'made'. Once 'made', the NOWNP will become part of the Development Plan for Norwich City Council, covering the defined neighbourhood area.

Monitoring

10.6 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the NOWNP to identify any unforeseen effects early and take remedial action as appropriate.

10.7 It is anticipated that monitoring of effects of the NOWNP will be undertaken by Wiltshire Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the NOWNP that would warrant more stringent monitoring over and above that already undertaken by Norwich City Council.

Appendix A Regulatory requirements

As discussed in **Chapter 1**, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report. However, interpretation of Schedule 2 is not straightforward. **Table AA.1** below links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table AA.2** explains this interpretation. Finally, **Table AA.3** identifies how and where within the Environmental Report the regulatory requirements have / will be met.

Table AA.1 Questions answered by this Environmental Report in-line with an interpretation of regulatory requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ⁹
What is the scope of the SEA?	What is the plan seeking to achieve? • An outline of the contents and main objectives of the plan.
	What is the sustainability 'context'? • Relationship with other relevant plans and programmes. • The relevant environmental protection objectives established at international or national level. • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
	What is the sustainability 'baseline'? • The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. • The environmental characteristics of areas likely to be significantly affected. • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
	What are the key issues and objectives? • Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
What has plan-making / SEA involved up to this point?	• Outline reasons for selecting the alternatives dealt with. • The likely significant effects associated with alternatives. • Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of

⁹ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

Environmental Report question

In line with the SEA Regulations, the report must include...⁹

	how environmental objectives and considerations are reflected in the current version of the plan.
What are the assessment findings at this stage?	• The likely significant effects associated with the Regulation 14 version of the plan. • The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Regulation 14 version of the plan.
What happens next?	• The next steps for the plan making /SEA process.

Table AA.2 Questions answered by this Environmental Report, in-line with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>		
<i>The report must include...</i>	<i>The report must include...</i>		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	i.e. answer - <i>What's the scope of the SA?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected		
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal		
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]	

Table AA.3 ‘Checklist’ of how (throughout the SEA process) and where (within this report) regulatory requirements have been, are and will be met

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 2 (‘What is the plan seeking to achieve’) presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The ‘SEA framework’ – the outcome of scoping – is presented within Chapter 3 (‘What is the scope of the SEA?’). More detailed messages, established through a context and baseline review are also presented in Appendix B of this Environmental Report.
3. The environmental characteristics of areas likely to be significantly affected.	
4. Any existing environmental problems which are relevant to the plan or programme including those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been considered during its preparation.	The SEA framework is presented within Chapter 3 (‘What is the scope of the SEA’). Also, Appendix B presents key messages from the context review. With regards to explaining “how...considerations have been taken into account”, Chapter 7 explains the Neighbourhood Forum’s ‘reasons for supporting the preferred approach’, i.e., explains how/ why the preferred approach is justified in light of alternatives appraisal.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air,	Chapter 6 presents alternatives appraisal findings (in relation to housing growth, which is a ‘stand-out’ plan policy area).

Regulatory requirement	Discussion of how requirement is met
climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).	Chapters 9 presents an appraisal of the plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g., timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	The assessment highlights certain tensions between competing objectives, which might potentially be actioned by the Examiner, when finalising the plan. Also, specific recommendations are made in Chapter 10.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Chapters 4 and 5 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapter 7 explains the Parish Council's 'reasons for selecting the preferred option' (in-light of alternatives assessment).
9. Description of measures envisaged concerning monitoring in accordance with Art. 10.	Chapter 11 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings.	The NTS is provided at the beginning of this Environmental Report.

The SA Report must be published alongside the Draft Plan, in accordance with the following regulations

authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)

At the current time, this Environmental Report is published alongside the 'submission' version of the Bentley Neighbourhood Plan, with a view to informing Regulation 16 consultation.

The SA must be considered, alongside consultation responses, when finalising the plan.

Regulatory requirement

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be considered during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

Discussion of how requirement is met

Assessment findings presented within this Environmental Report, and consultation responses received, have been fed back to the Neighbourhood Forum and have informed plan finalisation.

Appendix B Scoping information

Overview

This appendix provides a summary of the information that was presented in the Scoping Report. The Scoping Report, which can be accessed on the NOWNP website, provides the information in full, alongside several figures.

Air quality

Key statistics

- The neighbourhood area largely overlaps with the Central Norwich AQMA.

Commentary

The **Central Norwich AQMA**, which covers the centre of Norwich, was first declared in 2012 due to exceedances in nitrogen dioxide (NO₂). Completed source apportionment exercises have identified road traffic emissions to be the most significant source of NO₂ in Norwich.

In order to tackle the exceedances within the AQMA, Norwich City Council produced an updated Air Quality Action Plan (AQAP) in 2021. In order to identify pollution hotspots (i.e. those areas where action is needed), Norwich City Council proposes to maintain and continue with the passive diffusion tube monitoring network. Diffusion tube locations are reviewed annually, with locations determined by any anticipated pollution hotspots, such as where changes to the road network may have had an impact on NO₂ levels.

In 2023, there were no exceedances of the NO₂ annual mean national objective. This is thought to be due to a number of measures taken to improve Norwich's air quality, which include optimised traffic flow at signalised junctions, improvements to improve pedestrian and cyclist safety and to improve traffic flow, low NO_x buses, and improved transport hubs.

Biodiversity and geodiversity

Key statistics

- The River Wensum Special Area of Conservation (SAC) is located approximately 2.8km northwest of the neighbourhood area, upstream. Additionally, the Broads SAC is located approximately 7.3km northeast of the neighbourhood area, downstream. There is also the Broadland Ramsar site and Special Protection Area (SPA), which covers the same area as the Broads SAC.
- With regard to nationally designated sites, Sites of Special Scientific Interest (SSSIs) within a 2km buffer of the neighbourhood area include St James' Pit; Catton Grove Chalk Pit; and Sweetbriar Road Meadows, Norwich.
- Local Nature Reserves (LNRs) within a 2km buffer of the neighbourhood area include Wensum Valley (Mile Cross Marsh and Sycamore Crescent), which is located to the northwest of the neighbourhood area; Mousehold Heath, which is located to the east; and Lion Wood, which is located to the southeast.

- There are no Biodiversity Action Plan (BAP) priority habitats within the neighbourhood area. However, deciduous woodland is located adjacent to the northwestern boundary of the neighbourhood area.

Commentary

Whilst the neighbourhood area is located centrally in Norwich, therefore within an urban area, it is also located in proximity to a number of designated sites for biodiversity and geodiversity. These sites, as discussed below, contribute to the wider area's ecological value and natural heritage.

The **River Wensum SAC** is designated primarily for its Annex I habitat: water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation. This habitat is characterised by diverse aquatic plant communities, including various species of water-crowfoot (*Ranunculus*). The SAC also supports several Annex II species, such as the white-clawed crayfish (*Austropotamobius pallipes*), brook lamprey (*Lampetra planeri*), bullhead (*Cottus gobio*), and Desmoulin's whorl snail (*Vertigo moulinsiana*). Positive impacts on the site's designation include ongoing conservation efforts aimed at preserving its unique habitats and species. However, the site faces negative pressures from factors such as water pollution, physical modifications to the river, and the presence of invasive species, which threaten the ecological integrity of the SAC.

The **Broads SAC** is designated for its Annex I habitats, including calcareous fens, alkaline fens, alluvial forests, transition mires, eutrophic lakes, and oligo-mesotrophic waters, which support a variety of aquatic and wetland plant communities. The site also provides important habitat for several Annex II species, including Desmoulin's whorl snail (*Vertigo moulinsiana*), the little whirlpool ram's-horn snail (*Anisus vorticulus*), fen orchid (*Liparis loeselii*), otter (*Lutra lutra*), and great crested newt (*Triturus cristatus*). Conservation efforts help maintain these habitats and species through water quality improvements and habitat restoration. However, the site faces threats from water pollution, including nutrient enrichment, which alters its ecological balance. Physical modifications, such as drainage and water abstraction, can degrade wetland habitats and reduce water availability. Invasive species pose additional risks by outcompeting native flora and fauna. Climate change may exacerbate these issues by influencing water levels and increasing extreme weather events.

Broadland SPA is designated under the EU Birds Directive to protect habitats crucial for various bird species. Notably, it supports wintering populations of Bewick's swan (*Cygnus columbianus bewickii*), whooper swan (*Cygnus cygnus*), wigeon (*Anas penelope*), gadwall (*Anas strepera*), shoveler (*Anas clypeata*), hen harrier (*Circus cyaneus*), and ruff (*Philomachus pugnax*). Breeding species include bittern (*Botaurus stellaris*) and marsh harrier (*Circus aeruginosus*). Positive conservation measures, such as habitat management and pollution control, have been implemented to maintain the site's ecological integrity. However, challenges persist, including invasive species and human-induced habitat changes.

The **Broadland Ramsar site** is a low-lying wetland complex in eastern Norfolk and northern Suffolk, encompassing the river valleys of the Bure, Yare, and Waveney, along with their major tributaries. This area features a mosaic of habitats, including open water, reedbeds, carr woodland, grazing marsh, and fen meadow. Designated as a Ramsar site, it meets several criteria: it supports a significant assemblage of rare plants and invertebrates associated with wetlands; it regularly supports

substantial numbers of waterfowl in winter; and it contains representative, rare, or unique wetland types within the biogeographic

region. Positive impacts on the site's conservation include ongoing habitat management and restoration efforts aimed at preserving its ecological integrity. However, the area faces challenges such as water quality issues, invasive species, and pressures from tourism and agriculture, which require continuous management to mitigate negative impacts.

St James' Pit SSSI is well known for its Upper Cretaceous mosasaur fossil remains. Mosasaurs, which are large marine reptiles, are relatively uncommon within British Cretaceous strata. St. James' Pit, however, has yielded teeth and individual bones, including jaw and vertebrae, belonging to two mosasaur genera, *Mosasaurs* and *Leiodon*. The remaining unexcavated chalk sequence within St. James' Pit is regarded as having the best potential for future mosasaur finds with the British Cretaceous. St. James' pit is therefore a key locality for the future taxonomic and evolutionary study of Upper Cretaceous mosasaurs. St James' Pit SSSI is considered to be in 100% favourable condition.

Catton Grove Chalk Pit SSSI is the type locality for the Upper Chalk (Cretaceous) Catton Sponge Bed. This famous late Campanian rock unit represents an early diagenetic hardened level (hardground) which has a well-preserved fauna including important ammonites and many undescribed sponges. This seldom exposed horizon representing a hardened seabed (a rarity in the Chalk) is an important marker band across East Anglia and is best seen at Catton. Catton Grove Chalk Pit SSSI is considered to be in 100% unfavourable-declining condition, due to accumulated talus and leaf litter as well as curtains of trailing roots and ivy and the base of the quarry is obscured by fallen branches and domestic rubbish.

The **Sweetbriar Road Meadows, Norwich SSSI** consists of unimproved wet meadows with permanent waterlogging, representing a rare example of a wetland habitat once common in east Norfolk. It features three main grassland communities: species-rich damp neutral grassland on higher ground, marshy grassland on the valley floor, and areas of tall fen. Dominant grasses include Yorkshire fog, meadow fescue, and tufted hair grass, with herbs like yellow rattle and southern marsh orchid. The site also has drainage ditches with diverse vegetation and is managed traditionally with light pony grazing, without artificial fertilizers or herbicides. This site is considered to be in 100% unfavourable-recovering condition, due to negative nutrient inputs and waterlogging from the Dolphin Drain through AMP4, however this is being actively mitigated.

The **Wensum Valley (Mile Cross Marsh and Sycamore Crescent) LNR** is made up of two sites. Mile Cross Marsh is located adjacent to Sweet Briar Road Meadows SSSI and consists of an area of fenland and an area of damp grassland. A number of years ago a local resident dug a pond, and this is used in spring by breeding frogs. Species of interest in the site include toads and voles, as well as orchids. Sycamore crescent is a long narrow plantation of mature woodland adjacent to the River Wensum. The canopy is predominantly beech and oak. The under-storey contains elm and sycamore.

The **Mousehold Heath LNR** is a remnant of a once more extensive heathland, with a mixture of oak / birch woodland, scrub, acid grassland and remnant heath, as well as a large seasonal pond. It is significant for its bell heather, ling, broom and common, western and dwarf gorse in the heathland. Further, it is important for a

variety of insect life and common lizards. The wooded areas have a variety of birds including greater-spotted woodpecker, sparrowhawk and song thrush.

Climate change and flood risk

Key statistics

- The largest contributor to carbon dioxide (CO₂) emissions in Norwich is the domestic sector, totalling 151.2 kilotons of CO₂ equivalent (ktCO₂e) in 2022. This sector accounted for just over 30% of the total emissions in Norwich in 2022, though it is noted that it has experienced a decrease from 299.6 ktCO₂e in 2005. The transport sector is the second largest contributor.
- Overall CO₂ emissions have decreased from 1030.6 ktCO₂e in 2005 to 493.7 ktCO₂e in 2022.
- Norwich emits less CO₂ emissions per capita (in tonnes) when compared to the regional and national average.

Commentary

Norwich City Council declared a climate emergency in January 2019, reflecting the need for urgent action to reduce or halt climate change and avoid potentially irreversible environmental damage resulting from it.

With regard to fluvial flood risk, a large part of the neighbourhood area is within Flood Zone 2. This is across the southern boundary, which is adjacent to the River Wensum. More specifically, areas of risk are associated with drainage into the River Wensum, as well as the road network. In terms of surface water flood risk, areas of high-medium flood risk generally relate to the road network, with flood risk dispersed across the neighbourhood area. Roads with a particularly high risk of flooding include Oak Street and Magdalen Street.

Community wellbeing

Key statistics

- According to data from the 2021 census, there are approximately 3,719 people living in the LSOAs that the neighbourhood area falls within¹⁹, and approximately 3,052 of these people live in the neighbourhood area according to the Neighbourhood Forum. The largest age group is 30-34 years (12.5% of the population), and then 20-24 years (11.9%). This is likely related to the presence of the University of East Anglia (UEA) and Norwich University of the Arts (NUA) in the city, as well as a growing job market that attracts recent graduates and young professionals.
- In terms of general health, the proportion of people in very good health in Norwich 017A and 016B is notably lower than the wider Norwich area (37.3% compared to 40.3%), as well as the regional and national averages. Whilst good health is broadly in line with the Norwich area and regional averages (and higher than the national average), bad and very bad health is higher nationally than at the local and regional level. It is noted that Norwich 017A has generally lower levels of very good and good health than Norwich 016B.

- 38% of the population within the Norwich 017A and Norwich 016B areas privately rent, whilst 36% live in social rented housing. Ownership makes up for just 26% of the tenure in the neighbourhood area, suggesting that the housing market is dominated by rental properties. This is likely influenced by a high student population, a more transient workforce, and affordability challenges that make homeownership less accessible in these areas.

Commentary

In terms of community infrastructure within the neighbourhood area, the urban location of Norwich Over the Wensum means there are a myriad of accessible facilities and services that contribute to the daily health and wellbeing of residents. If these facilities are not accessible within the neighbourhood area, they are available in close proximity in the wider Norwich area.

The Index of Multiple Deprivation (IMD) is an overall relative measure of deprivation and is the combination of several different domains: income; employment; education, skills and training; health deprivation and disability; crime; barriers to housing and services; and living environment. Lower super output areas (LSOAs) are designed to improve the reporting of small area statistics in England and Wales. They are standardised geographies intended to be as consistent as possible, with each LSOA containing approximately 1,000 to 1,500 people. Deprivation levels are typically examined at the LSOA level. In this respect, Norwich Over the Wensum sits within Norwich 007B and Norwich 007E²³. Norwich 007B covers the southern half of the neighbourhood area, whilst Norwich 007E covers the northern half. It is noted that both LSOAs extend outwards beyond the neighbourhood area boundaries.

The neighbourhood area experiences high levels of deprivation, with Norwich 007E sitting within the top 10% of most deprived neighbourhoods for overall IMD. It is ranked 2,129 of 32,844 LSOAs in England, where 1 is the most deprived LSOA. However, this is an improvement from 2015, where it ranked 1,753. Norwich 007B is less deprived, sitting within the 40% most deprived neighbourhoods, an improvement also from 2015, where it was within the 30% most deprived. In terms of other deprivation deciles, both Norwich 007B and Norwich 007E have high levels of deprivation in terms of the health deprivation and disability domain, as well as the crime domain, however this is not uncommon for urban areas.

It is also noted that there are significant populations of Asian, African, Caribbean, and other ethnic groups within the neighbourhood area.

Historic environment

Key statistics

- There are 133 listed buildings within the neighbourhood area, nine of which are Grade I; another nine of which are Grade II* listed; and 115 are Grade II listed.
- Parts of the city walls and towers are designated as scheduled monuments.
- The neighbourhood area falls entirely within the Norwich City Centre Conservation Area.
- There is one designated feature within the neighbourhood area that is included on the 2024 Heritage at Risk Register. This is the Grade I listed Church of St Martin at Oak, Oak Street, Norwich. The main reason it is on the Register is due

to parapets that are in poor condition, localised areas of loose masonry, poor rainwater goods, and active leaks to south aisle and north porch roofs.

Commentary

The Norwich Heritage Investment Strategy emphasises the importance of Norwich's heritage for tourism, business, and the urban environment. It aims to improve the management, maintenance, and ownership of heritage assets while raising income, public access, and conservation efforts. The strategy highlights financial constraints and the need for external funding, outlines best practices for managing heritage assets. Community involvement and educational opportunities are also emphasised.

The Norwich City Centre Conservation Area is sub-divided into 13 separate character areas, which are generally defined using a series of criteria which reflect the history of the area, its natural and man-made components, and its past and present uses. Each of these have also been rated with a significance (low, significant, high, very high), indicating its sensitivity to change, its contribution to the character of the City Centre Conservation Area, and its degree of uniqueness. Factors impacting significance include concentration of historic buildings, presence of features from historical period(s), townscape / landscape quality, quality of details, and concentration of negative features. The significance of each area then establishes how policy is applied to each area. With areas of higher significance, emphasis is generally on protecting and enhancing the quality, whilst in areas of lower significance, the emphasis is on positive regeneration, promoting the reconstruction of the areas and using good design to increase the quality of the environment.

There are four character areas of the City Centre Conservation Area that the neighbourhood area falls within, these are:

- Northern City character area (significant) which covers the north of the neighbourhood area.
- Anglia Square character area (low) which covers the central north of the neighbourhood area.
- Northern Riverside character area (significant) covering the southern boundary of the area, and everything that is in proximity to the River Wensum.
- Colegate character area (high) which covers the central south of the neighbourhood area.

Northern City character area: This character area, which covers St Augustine's Street and Magdalen Street, is characterised by streets of 19th-century houses, medieval churches, and remnants of the City Walls from the 13th century. Key characteristics include a mix of historic and modern housing courts, narrow streets with strong built frontages, and notable landmarks like St Augustine's Church and the City Walls. Management and enhancement advice focuses on improving historic interpretation, alleviating traffic problems, restricting new development to 2-3 storeys, and restoring front boundary walls to preserve the area's unique townscape and historical integrity.

Anglia Square character area: This character area highlights its historical significance as part of the Saxon settlement of Northwick. Key characteristics include late 20th-century commercial developments, industrial units, and surface car parking, which have resulted in poor townscape quality. In this area, many of the buildings were

destroyed by bombs, or later, demolished by developers and is thus largely 1970s development (or lack thereof where there is rough surface carparking). It is noted that Anglia Square was recently bought by the City Council, and current plans are for imminent demolition and redevelopment. The area lacks significant landscaped open spaces but has important urban spaces like Anglia Square. Management and enhancement advice includes respecting the existing scale of buildings, reinstating historic routes, and retaining significant open spaces in new developments to improve the area's townscape and historical integrity.

Northern Riverside character area: This area has historical significance due to its medieval origins and the presence of the River Wensum, which has shaped the area's development. Key characteristics include a mix of historic warehouses, industrial buildings, and modern developments, with notable landmarks such as medieval churches, remnants of the City Walls, and attractive views along the river. Management and enhancement advice focuses on preserving the area's historical integrity by maintaining the scale and character of existing buildings, improving public access to the riverfront, and enhancing the streetscape through careful planning and restoration efforts.

Colegate character area: This area, which covers Magdalen Street, holds high historical significance due to its well-preserved medieval street pattern and architectural heritage. The area, originally settled in the late Saxon period, saw expansion during Norman times and flourished in the medieval era, with wealthy merchants constructing fine houses, particularly in the 15th and 18th centuries. The influx of 'Strangers' in the 16th century revolutionized the cloth trade, while the 19th century saw the rise of leatherworking and industrial buildings, many of which still define the western part of the area. Key landmarks include St George's Colegate Church, the Octagon Chapel, and various merchants' houses, contributing to a rich townscape of narrow alleys, intimate courtyards, and grand factories. Today, while commercial and office spaces dominate, many historical religious buildings have been repurposed. To enhance the area, recommendations include reinstating historic building lines, improving connectivity, traffic calming on Duke Street, unifying streetscapes, refurbishing industrial buildings, and ensuring new development respects traditional architectural forms.

Locally important, non-designated heritage assets are an integral part of the historic environment. There are many locally important non-designated heritage assets within the neighbourhood area, many of which are 19th Century buildings, frequently of red brick as is common across Norwich. Key areas include Duke Street, Oak Street, Magdalen Street, and Golden Dog Lane.

Land, soil, and water resources

Key statistics

- The majority of the neighbourhood area is developed, and as such is within 'urban use' according to the provisional agricultural land classification (ALC) dataset provided by Natural England.
- The neighbourhood area sits within the Yare Operational Catchment, which contains 12 water bodies, including the Wensum DS Norwich Water Body which bounds the neighbourhood area to the east and south and has a moderate ecological status.

Commentary

The provisional ALC dataset provided by Natural England indicates that the entirety of the neighbourhood area is in 'urban' use. This aligns with the fact that the neighbourhood area sits centrally with the city of Norwich and is entirely developed. Whilst there is very little land of agricultural value in the neighbourhood area, there are a number of brownfield sites that have the potential to be redeveloped. According to the Brownfield Land Register 2024, 17 sites brownfield sit within the neighbourhood area. However, it is noted that two of these sites – the furthest west and the furthest south – are already in the process of being developed with housing, and student accommodation and lecture theatres, respectively. It is also noted that these brownfield sites range in size significantly; the largest has capacity for approximately 1,000 homes, whilst the smallest have capacity for approximately 25 homes each.

Given the urban nature of the neighbourhood area, it is not covered by a Mineral Safeguarding Area (MSA) or similar.

In terms of water resources, the neighbourhood area is relatively constrained. In addition to be bound by the Wensum DS Norwich Water Body, it sits within a Source Protection Zone (SPZ) Zone II Outer Protection Zone and a Nitrate Vulnerable Zone (NVZ). The neighbourhood area is also partially within a Drinking Water Safeguard Zone for the River Wensum.

Water is supplied to the neighbourhood area by Anglian Water. Their Water Resources Management Plan (WRMP) for 2024 identifies significant challenges for the East of England between 2025 and 2050. Namely, by 2050 Anglian Water will have 38% less water to supply to customers. This is primarily driven by further abstraction licence capping and adapting to the impacts of climate change, particularly drought. Anglian Water expect an increased demand for water by 2050 with the region's population expected to grow by 18% during the period 2025-2050. Without any action, Anglian Water will experience a shortfall of 593 megalitres of water a day by 2050. This is equivalent to approximately half of the amount of water they put into the network currently.

Landscape

Key statistics

- The southern boundary of the neighbourhood area is adjacent to the Broads National Park.
- The neighbourhood area sits within two National Character Areas (NCAs); mainly Central North Norfolk NCA, with a small part of the southwest corner sitting within the Mid Norfolk NCA.

Commentary

The Broads National Park, spanning Norfolk and Suffolk, is Britain's largest protected wetland, encompassing over 200km of navigable waterways formed from seven rivers and more than 60 broads - large, shallow lakes - of which 13 are fully navigable. The largest broads include Hickling Broad, Barton Broad, and Oulton Broad. This unique landscape, shaped by medieval peat excavations that later flooded, offers a rich tapestry of interconnected waterways, fens, marshes, and woodlands, providing vital habitats for diverse wildlife, including the rare Norfolk

Hawker dragonfly and the Swallowtail butterfly, found only in this region. The area is steeped in history, featuring traditional wherries, windmills, boathouses, abbeys, and an unusually high density of medieval churches, with 25 conservation areas, 14 ancient monuments, and 270 listed buildings protected for public enjoyment. Visitors can engage in various activities such as boating, sailing, kayaking, walking, cycling, and wildlife watching, immersing themselves in the park's tranquil beauty and cultural heritage.

Central North Norfolk, designated as NCA 78, features a gently undulating, sometimes flat, rural landscape dissected by river valleys, with the prominent glacial landform of the Cromer Ridge and dynamic coastal cliffs providing distinctive features to the north. The area is characterised by a complex mix of gravels, sands, chalk erratics, and glacial till left behind by retreating Pleistocene ice, resulting in diverse soil types that influence natural vegetation patterns. Settlement patterns include villages and isolated farmsteads connected by a network of minor roads, with coastal towns like Sheringham and Cromer developing as holiday resorts in the early 19th century. The local vernacular architecture predominantly features red brick and flint buildings with pantiled roofs, and the area boasts an unusually high density of medieval churches that serve as prominent landmarks. Management strategies for Central North Norfolk focus on protecting historic settlement patterns, enhancing woodlands by replacing non-native plantations with native species, restoring heathland habitats, and improving biodiversity by managing chalk rivers and reconnecting them to their floodplains. These efforts aim to preserve the area's distinctive landscape character, biodiversity, and cultural heritage.

Mid Norfolk, designated as NCA 84, is a rural and largely flat landscape, characterised by enclosed arable farmland, winding lanes, hedgerows, and scattered woodlands, with gently rolling landforms becoming more pronounced towards the north and east. The area features a dispersed settlement pattern with traditional market towns and numerous isolated farmsteads, connected by an intricate network of roads and public rights of way, including the Peddars Way and Norfolk Coast Path. Architectural heritage is evident in the red brick and flint buildings with pantiled roofs, as well as a high density of medieval churches. Key environmental features include chalk rivers, such as the River Wensum, and diverse wetland, woodland, and grassland habitats. Management priorities focus on conserving and enhancing these landscapes through habitat restoration, sustainable agricultural practices, woodland and heathland management, and river system rehabilitation. Strategies include reintroducing traditional coppicing, restoring fragmented heathlands, reinstating hedgerows, and improving chalk river habitats to support biodiversity, geodiversity, and climate resilience.

Transportation

Key statistics

- The majority of the working population in Norwich 017A and 016B work less than 10km from their home. 35.8% of the population over 16 years old and in employment mainly work from home. This is greater than the average for Norwich (29.6%), the wider county, and England.
- The most popular method of transport to work in Norwich 017A and 016B is on foot. This is much higher than the averages for Norwich, Norfolk, and England. A higher proportion of residents in the neighbourhood area use bus, minibus, or coach than across the city, county, and nation level.

Commentary

Norwich Over the Wensum is well located in terms of transport due to its urban location. Norwich Railway Station is the primary transport hub for the city, located less than 1km from the neighbourhood area. Located just southeast of the city centre, across the Wensum, the station is easily accessible from various parts of Norwich via road and pedestrian routes. It serves as a key terminus on the Great Eastern Main Line, providing direct services to London Liverpool Street, as well as connections to regional destinations such as Cambridge, Ely, and Peterborough. Additionally, the station links Norwich to coastal locations like Great Yarmouth, Lowestoft, and Cromer, making it an essential gateway for both commuters and visitors traveling within East Anglia.

There are a number of bus services that allow for sustainable connections to and from the wider area into and out of Norwich Over the Wensum, with several bus stops located along Magdalen Street, Edward Street, and the A1402. Norwich Over the Wensum is largely considered to be the gateway to north Norwich and North Norfolk. The positioning of the bridges over the river Wensum means that many of the major routes to and from North Norfolk have to go through, or adjacent to the Norwich Over the Wensum area. These allow for easy and regular access into Norwich City Centre, as well as other locations outside of Norwich.

Examples of key important routes north from Norwich are to Wroxham in the Broads National Park (First and Konnect) and Sheringham and Cromer on the coast, as well as the towns of North Walsham and Aylsham (Sanders). The Konnect bus also goes north to Norwich Airport. Some of the routes stopping at Anglia Square go through Norwich centre, thus connecting to places south and west of the city, notably to the Norfolk and Norwich Hospital, and as far away as Wymondham and Long Stratton.

In terms of the strategic road network, the A147 runs directly through the neighbourhood area, which is Norwich's inner ring road. The A1151 runs adjacent to the neighbourhood area and serves as the main road to Wroxham and the Norfolk Broads. Other key roads in the area include the A1067, which runs through the west of the neighbourhood area and links to Fakenham, and the A1402, which connects to North Norfolk, as well as the airport. The A1402 also becomes the A140, which is the main road to Cromer, on the coast, via Aylsham.

National Cycle Network routes pass through the neighbourhood area, primarily in the southwest, as well as Public Rights of Way (PRoW) which run through the entire neighbourhood area.

