



North Norfolk Local Plan HRA Addendum relating to additional housing, October 2024

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Summary

This report is an addendum to the North Norfolk Local Plan Habitats Regulations Assessment (HRA), Submission version originally produced by Footprint Ecology in 2021. Following initial examination hearings in early 2024, the Inspector's initial findings indicated the provision made by the submitted plan should be increased by at least 1000 dwellings. As a result of the Inspector's findings, the Council has identified additional housing sites that will be added to the Plan and the Council has also updated the settlement hierarchy (Policy SS1).

This report is intended to sit alongside the submission HRA report and considers the different allocations and revised hierarchy in terms of their implications for the HRA. As such this report provides the necessary detail to inform future consultation and hearings as part of the continued examination of the Plan. It is not an update of the submission HRA and is specific to the additional housing identified by the Council.

We have undertaken a preliminary screening of the additional allocations and the inclusion of additional settlements. This screening triggered a range of likely significant effects relating to recreation and water quality in particular, with risks for all allocations and settlements.

Strategic mitigation is in place for recreation through the established mitigation strategy (GIRAMS) and there is a requirement for nutrient neutrality in place for relevant sites, as well as a need for further project level HRA and more detailed consideration for some sites. It should therefore be possible for an updated HRA to rule out adverse effects on integrity, alone or in-combination, for the Plan with respect to all European sites.

At this point in time, it is anticipated that the additional allocations and settlements included in policy SS1 can be incorporated into the Plan without undermining the HRA work done to date and that the changes proposed will not materially change the overall findings of the submission HRA.

It is anticipated that the submission HRA will be updated alongside the final version of the Plan, including any further modifications or changes to the Plan required as the examination and further hearings progress. The HRA will be finalised at the point of adoption of the Plan. The final HRA will need to incorporate the findings from this (and a previous) addendum. In addition, the update should include reference to the latest work on the GIRAMS, the latest position on nutrient neutrality and the latest advice from Natural England.

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Acknowledgements

This report has been commissioned by North Norfolk District Council and our thanks to Iain Withington and Chris Brown for providing the supporting information, background and useful comment.

1. Introduction

- 1.1 This report is an addendum to the North Norfolk Local Plan Habitats Regulations Assessment (HRA), Submission version originally produced by Footprint Ecology in 2021, (with a separate addendum in 2023 relating to a single policy CC13).
- 1.2 Following initial examination hearings in early 2024, the Inspector's initial findings¹ indicated he was not able to conclude that the plan met the objectively assessed housing needs of the district and that there was a shortfall of about 700 dwellings. Allowing for contingency, the findings indicate the provision made by the submitted plan should be increased by at least 1,000 dwellings.
- 1.3 As a result of the Inspector's findings, the Council has identified additional housing sites that will be added to the Plan and the Council has also updated the settlement hierarchy.
- 1.4 This report is intended to sit alongside the previous HRA report and considers the different allocations and revised hierarchy in terms of their implications for the HRA. As such this report provides the necessary detail to inform future consultation and hearings as part of the continued examination of the Plan.
- 1.5 The HRA has been updated at each stage of the Plan and will be finalised to accompany the Local Plan at adoption. The intention is that the HRA will be updated alongside any main modifications and at that point a complete, revised HRA report will be produced.
- 1.6 In the meantime, this document should be read in conjunction with the submission HRA [A4]. That document provides background and information on the HRA process, the North Norfolk Local Plan,

¹ See post hearings letter, <https://www.north-norfolk.gov.uk/media/10490/eh006-f-inspectors-post-examination-hearings-letter.pdf>

relevant European sites, a complete screening of the submission version of the Local Plan and appropriate assessment.

The additional allocations and site extensions

1.7 There are a total of 11 additional sites identified by the Council. Of these 11, six were included in the submission HRA but now have extensions proposed. All 11 new allocations are shown in Map 1 and listed in Table 1.

Table 1: Allocations. Indicative number of dwellings is the combined total for the extensions.

Site	Settlement	Type of site	Indicative number of dwellings
Site 1 C10-1	Cromer	New	70
Site 2 C22-4	Cromer	Extension of existing allocation	500
Site 3 NW16	North Walsham	New	330
Site 4 HV01C	Hoveton	Extension of existing allocation	150
Site 5 HV06A	Hoveton	New	50
Site 6 ST04A	Stalham	New	45
Site 7 ST19B	Stalham	Extension of existing allocation	150
Site 8 BLA01B	Blakeney	New	30
Site 9 BRI02C	Briston	Extension of existing allocation	90
Site 10 LUD01C	Ludham	Extension of existing allocation	60
Site 11 MUN03A	Mundesley	Extension of existing allocation	45

Settlements

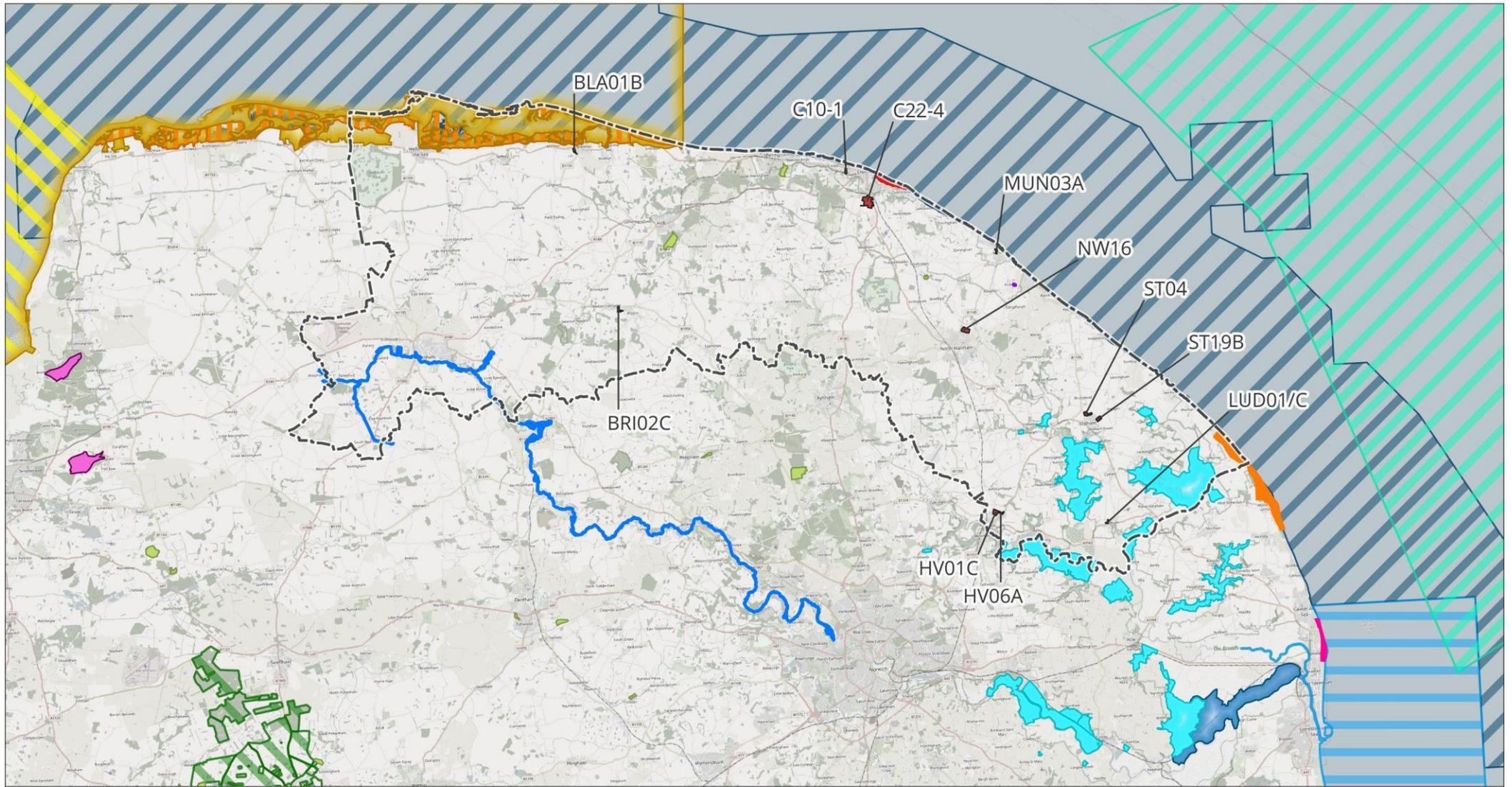
1.8 Alongside the additional allocations, an additional 10 villages have been added to the small growth village hierarchy (policy SS1). The policy approach has not changed from the submitted plan i.e. there are no allocations at this level but growth adjacent to the defined

settlement boundaries is permitted subject to certain requirements as set out in criteria 3 policy. The additional 10 villages and the indicative housing allowance for all small growth villages are listed in Table 2 and shown in Map 2. Note that for this tier in the hierarchy the level of growth is increased from 6% to 9%.

Table 2: Amended Table showing Small Growth Villages Housing Apportionment. Green shaded rows highlight the 10 additional villages added to the hierarchy.

Settlement (Parish)	Indicative Housing Allowance (September 2024)
Aldborough	22
Badersfield (Scottow)	35
Bacton	45
Beeston Regis	43
Binham	11
Catfield	39
Corpusty & Saxthorpe	29
East & West Runton	64
Erpingham	29
Felmingham	23
Great Ryburgh	26
Happisburgh	36
High Kelling	20
Horning	0
Itteringham	5
Langham	15
Little Snoring	24
Little Walsingham (Walsingham)	31
Northrepps	43
Overstrand	38
Potter Heigham	0
Roughton	37
Sculthorpe	28
Sea Palling	0
Southrepps	34
Stibbard	13
Sutton	46
Trunch	37
Tunstead	42
Walcott	0
Weybourne	20
Worstead	38
Total Housing Delivery @ 9%	873

Map 1: European sites and additional allocations (labelled).

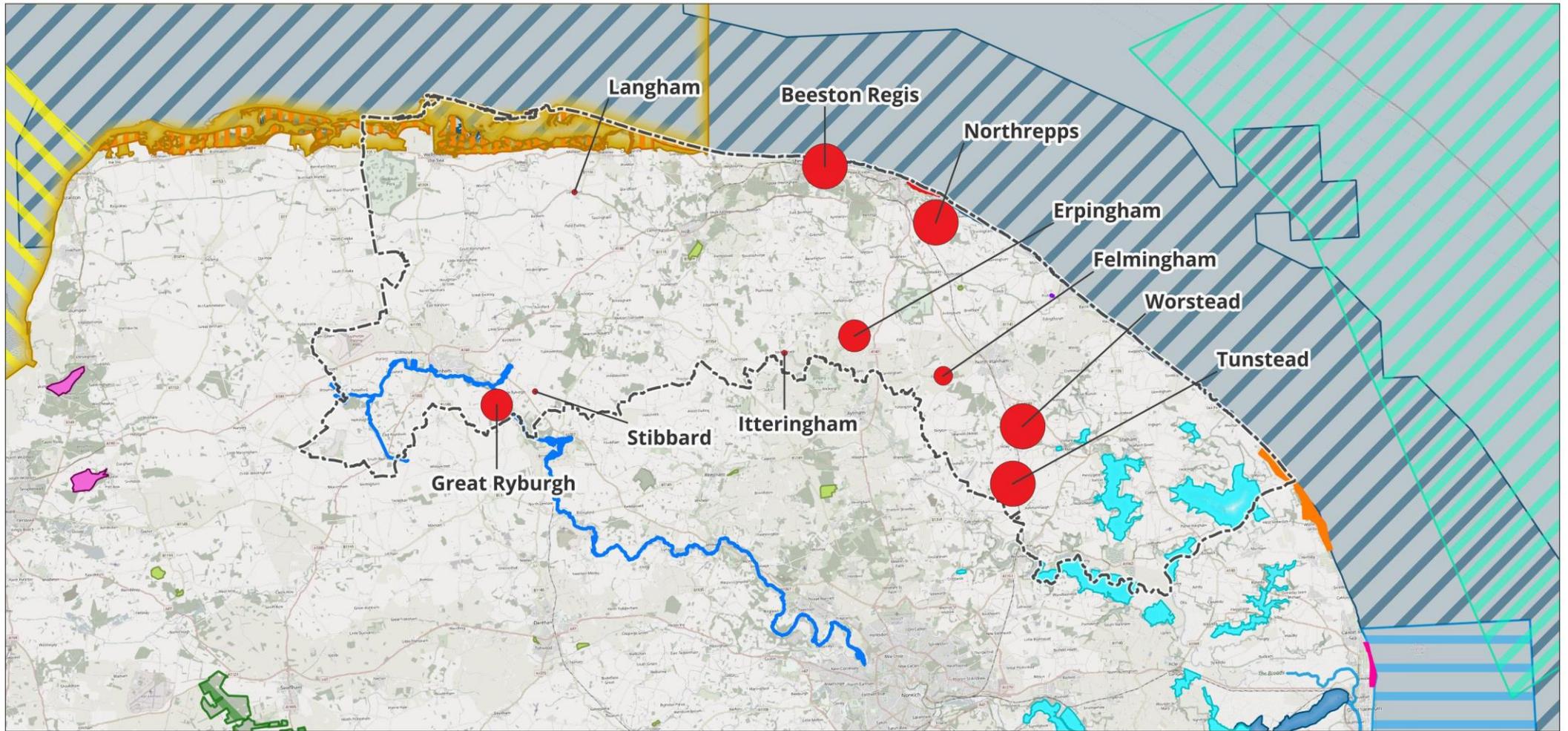


Legend

North Norfolk District boundary	North Norfolk Coast	Breydon Water	Outer Thames Estuary	Norfolk Valley Fens	The Broads
Ramsar:	Roydon Common	Broadland	The Wash	North Norfolk Coast	Roydon Common & Dersingham Bog
Breydon Water	The Wash	Great Yarmouth North Denes SAC:		Overstrand Cliffs	The Wash & North Norfolk Coast
Broadland	SPA:	Greater Wash	Breckland	Paston Great Barn	Winterton-Horsey Dunes
Dersingham Bog	Breckland	N Norfolk Coast	Haisborough, Hammond and Winterton	River Wensum	



Map 2: European sites and additional allocations (labelled).



Legend



Initial screening

- 1.9 In the submission version HRA, the following impact pathways were identified as having the potential to result in likely significant effects:
- Loss of supporting habitat
 - General urban effects
 - Recreation
 - Hydrological impacts
 - Air quality
- 1.10 It should however be noted that in the screening of the submission version no likely significant effects were identified with respect to the loss of supporting habitat or air quality for any European site, alone or in-combination.
- 1.11 All 11 allocations and the additional settlements were checked using these bulleted pathways for the potential for likely significant effects for any European site, alone or in-combination.
- 1.12 Using GIS, we extracted the distance from each allocation to each European site (the closest distance from the nearest part of the respective boundary from each). GIS data with the boundaries of each allocation were provided by the Council. This distance matrix is provided in Appendix 1. We then used the following criteria to identify allocations where likely significant effects would be triggered or at least some further checks were required:
- Loss of supporting habitat: any allocation within 2km of the Broadland SPA/Ramsar or the North Norfolk Coast SPA/Ramsar. Any allocations falling within these areas were checked using aerial imagery to determine whether they had the potential to support wintering or passage waterbirds, for example that they could provide roost sites or foraging areas for swans, geese or similar.
 - General urban effects: any allocation falling within 400m of a European site boundary warranted further checks in GIS, here urban effects a potential risk to the site.
 - Recreation: all new residential development assumed to trigger likely significant effects in-combination in line with the GI RAMS and advice from Natural England; any allocation within 500m of a European site was reviewed in GIS to check for footpath links and direct access to European sites in case risks alone and also any site

allocated for more than 50 dwellings triggered likely significant effects alone, due to the scale of growth in one location, in line with the latest advice from Natural England.

- Hydrological issues: any allocation falling within the catchment of the Broads SAC/Broadland SPA/Ramsar or the River Wensum SAC triggered alone due to nutrient neutrality issues.

- 1.13 Similar checks were also made for the additional small growth villages added to the small growth village hierarchy (policy SS1).
- 1.14 Results from these checks and initial screening are given in Table 3 and Table 4. Risks for all impact pathways apart from air quality have been identified from the additional housing sites. For air quality, detailed checks were made as part of the submission version of the HRA and road sections within 200m of European sites were identified and mapped. All of these road sections are very short sections of road and checks of aerial photographs reveal that the proportion of the European site within 200m of the road is very low and the habitats present are not ones particularly vulnerable to air quality. Given the rural nature of these roads, and the dispersed nature of the allocations, likely significant effects were ruled out, alone or in-combination. This was checked at the time with Natural England who agreed with the assessment findings. The additional growth, dispersed so widely on the same road network does not result in a need to change this finding.
- 1.15 Having completed the screening, all allocations would trigger likely significant effects alone for at least one pathway, with the exception of MUN03A where likely significant effects are triggered in-combination only, for recreation. In addition, policy SS1 would remain screened in with likely significant effects alone due to the overall level of growth and distribution of growth set out in the policy.

Table 3: Potential screening where allocation might trigger likely significant effects alone (a) or in-combination (ic). Total dwellings is the consolidated total.

Allocations	Total dwellings	Loss of supporting habitat	General urban effects	Recreation	Water issues	Air quality	Comments
C10-1	70			a			Recreation within relative zones for: The Broads/ SAC/SPA/Ramsar; The Wash SPA/Ramsar, The Wash & North Norfolk Coast SAC, North Norfolk Coast SAC/SPA/Ramsar, Norfolk Valley Fens.
C22-4	500			a	a		Recreation within relative zones for: The Broads/ SAC/SPA/Ramsar; The Wash SPA/Ramsar, The Wash & North Norfolk Coast SAC, North Norfolk Coast SAC/SPA/Ramsar, Great Yarmouth Denes SPA; Winterton Horsey Dunes SAC; Norfolk Valley Fens. Water: Site within Broads catchment.
NW16	330			a	a		Recreation within relative zones for: Breydon Water SPA/Ramsar; The Broads/ SAC/SPA/Ramsar; Great Yarmouth Denes SPA; Winterton Horsey Dunes SAC; The Wash SPA; The Wash & North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar. Water: Site within Broads catchment.

Allocations	Total dwellings	Loss of supporting habitat	General urban effects	Recreation	Water issues	Air quality	Comments
HV01C	150			a	a		<p>Loss of supporting habitat: Site is relatively close to Broadland SPA/Ramsar but checks of aerial photos indicate site (on north edge of Hoveton) is between 2 roads and has housing on 3 sides. Unlikely foraging habitat for swans.</p> <p>Recreation within relative zones for: Breydon Water SPA/Ramsar; The Broads/ SAC/SPA/Ramsar; Great Yarmouth Denes SPA; Winterton Horsey Dunes SAC; The Wash & North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar; Norfolk Valley Fens.</p> <p>Water: Site within Broads catchment.</p>
HV06A	50			a	a		<p>Loss of supporting habitat: Site is relatively close to Broadland SPA/Ramsar but checks of aerial photos indicate site (on north edge of Hoveton) is alongside Stalham road and adjacent to existing housing. Unlikely foraging habitat for swans.</p> <p>Recreation within relative zones for: Breydon Water SPA/Ramsar; The Broads/ SAC/SPA/Ramsar; Great Yarmouth Denes SPA; Winterton Horsey Dunes SAC; The Wash & North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar; Norfolk Valley Fens. Site is at the 50 dwelling threshold referred to in Natural England advice</p> <p>Water: Site within Broads catchment.</p>
ST04	45			ic	a		<p>Loss of supporting habitat: Site is relatively close to Broadland SPA/Ramsar but checks of aerial photos indicate site unlikely foraging habitat for swans.</p>

Allocations	Total dwellings	Loss of supporting habitat	General urban effects	Recreation	Water issues	Air quality	Comments
							<p>Recreation within relative zones for: Breydon Water SPA/Ramsar; The Broads/ SAC/SPA/Ramsar; Great Yarmouth Denes SPA; Winterton Horsey Dunes SAC; The Wash & North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar.</p> <p>Water: Site within Broads catchment.</p>
ST19B	150			a	a		<p>Loss of supporting habitat: Site is relatively close to Broadland SPA/Ramsar but checks of aerial photos indicate site unlikely foraging habitat for swans.</p> <p>Recreation: Breydon Water SPA/Ramsar; The Broads/ SAC/SPA/Ramsar; Great Yarmouth Denes SPA; Winterton Horsey Dunes SAC; The Wash & North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar.</p> <p>Water: Site within Broads catchment.</p>
BLA01B	88			a			<p>Loss of supporting habitat: Site close to North Norfolk Coast SPA/Ramsar but within Blakeney and largely surrounded by housing so no risks.</p> <p>General Urban Effects: Within 200m of the Greater Wash SPA, The Wash & North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar however set back enough that garden escapes are not likely to be an issue; main coast road and creeks etc act as barriers for cats and mean cats not a risk.</p>

Allocations	Total dwellings	Loss of supporting habitat	General urban effects	Recreation	Water issues	Air quality	Comments
							Recreation within relative zones for: The Wash SPA/Ramsar; The Wash & North Norfolk Coast SAC; North Norfolk Coast SPA/SAC/Ramsar; Norfolk Valley Fens SAC. Scale of growth and proximity means risks for coastal sites triggered alone.
BRI02C	90			a	a		Recreation within relative zones for: The Wash & North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar; Norfolk Valley Fens. Water: Site within Broads catchment.
LUD01C	60			a	a		Loss of supporting habitat: Site on edge of Ludham village and surrounded on 3 sides by housing. No risks in relation to foraging habitat for swans. Recreation: within relative zones for Breydon Water SPA/Ramsar; The Broads/ SAC/SPA/Ramsar; Great Yarmouth Denes SPA; Winterton Horsey Dunes SAC; The Wash & North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar. Water: Site within Broads catchment.
MUN03A	45			ic			Recreation: within relative zones for The Broads/ SAC/SPA/Ramsar; Great Yarmouth Denes SPA; Winterton Horsey Dunes SAC; The Wash & North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar; Norfolk Valley Fens.

Table 4: Potential risks associated with different settlements

Settlement (Parish)	Loss of supporting habitat	General urban effects	Recreation	Water issues	Air quality	Comments
Beeston Regis		✓	✓			General urban effects potentially relevant with respect to the Norfolk Valley Fens (Sheringham and Beeston Regis Commons SSSI component). Outside Broads catchment so no risks with respect to nutrient neutrality.
Erpingham			✓	✓		Within Broads catchment so risks with respect to nutrient neutrality.
Felmingham			✓	✓		Within Broads catchment so risks with respect to nutrient neutrality.
Great Ryburgh	✓	✓	✓	✓		Within River Wensum and Broads catchment (directly adjacent to River Wensum SAC) so risks with respect to nutrient neutrality. Potential risks from general urban effects and loss of supporting habitat due to proximity to River Wensum SAC.
Itteringham			✓	✓		Within Broads catchment so risks with respect to nutrient neutrality.
Langham			✓			Within relatively easy reach of North Norfolk Coast (Blakeney Harbour area) so significant growth here could trigger recreation concerns alone and a need for enhanced GI.

Settlement (Parish)	Loss of supporting habitat	General urban effects	Recreation	Water issues	Air quality	Comments
Northrepps			✓	?		Just outside catchment for Broads, however specific locations should be checked in relation to relevant WWTWs with respect to nutrient neutrality concerns.
Stibbard			✓	✓		Within River Wensum and Broads catchment (directly adjacent to River Wensum SAC) so risks with respect to nutrient neutrality.
Tunstead			✓	✓		Within Broads catchment so risks with respect to nutrient neutrality.
Worstead			✓	✓		Within Broads catchment so risks with respect to nutrient neutrality.

Appropriate assessment considerations and implications for the Plan

1.16 Initial screening identified a range of impact pathways that are relevant and in particular a need that all the additional allocations will require appropriate assessment. The implications are considered below.

Recreation

1.17 Recreation impacts are relevant for a wide range of European sites and this is a strategic issue across Norfolk. All the Norfolk local planning authorities have worked together, with advice from Natural England, to establish a county-wide strategic mitigation scheme in the form of GIRAMS. This scheme ensures mitigation for the in-combination effects of recreation from strategic housing growth, and recent updates (by Footprint Ecology in 2024) ensures the package of mitigation measures relates to the scale and distribution of growth coming forward. With the GIRAMS in place and secured in policy, it should be possible to conclude adverse effects on integrity, in-combination, are eliminated.

1.18 The most recent Natural England advice in relation to the GIRAMS recommends that large developments (above 50 dwellings) may trigger likely significant effects alone and additional mitigation in the form of enhanced green infrastructure may be necessary. To ensure compliance with this advice, policy wording should ensure that each large allocation secures sufficient and appropriate green infrastructure and that this is assessed through project level HRA.

1.19 Allocation BLA01B in Blakeney is particularly close to the North Norfolk Coast SAC/SPA/Ramsar and while the allocation is relatively small compared to some of the others, the proximity to the European site means there are particular risks at this location and project level HRA will be particularly important. There may be a need to secure particular local infrastructure or high quality green infrastructure to ensure adverse effects on integrity can be ruled out.

Water issues

- 1.20 A number of the allocations and numerous settlements included in policy SS1 are within the catchment of the Broads or the River Wensum SAC. As such all development in these locations will need to secure nutrient neutrality.

Great Ryburgh

- 1.21 Great Ryburgh is one of the additional 10 villages added to the small growth village hierarchy (policy SS1), with an indicative level of growth of 26 dwellings suggested. This village is directly adjacent to the River Wensum SAC and there is a risk that growth here will pose risks to the SAC simply by the proximity to the site, with issues such as run-off, garden escapes and loss of supporting habitat (e.g. for Desmoulin's Whorl Snail or the fish) if any aquatic or wetland habitats are affected. As the policy is high level and strategic these risks can only be considered and checked at project level HRA, once precise details of locations are available. They may not be relevant at all if development were to come forward in the western part of the village for example. As such, risks are addressed through the general European sites policy and the need for project level HRA, clearly set out in Policy ENV5 within the Plan.

Conclusions

- 1.23 We have undertaken a preliminary screening of the additional allocations and the inclusion of additional settlements in policy SS1. This work has been undertaken to help inform further consultation and the implications of the changes to the Plan in terms of the existing HRA work undertaken at submission.
- 1.24 The initial screening triggered a range of likely significant effects relating to recreation and water quality in particular, with risks for all allocations and settlements. The implications for appropriate assessment are considered. There is strategic mitigation in place for recreation through the GIRAMS and a requirement for nutrient neutrality in place for relevant sites, alongside a need for further project level HRA and more detailed consideration for some sites. Therefore, it should be possible for an updated HRA to rule out adverse effects on integrity, alone or in-combination for the Plan with respect to all European sites.
- 1.25 At this point in time, it is anticipated that the additional allocations and settlements included in policy SS1 can be incorporated into the Plan without undermining the HRA work done to date and that the changes proposed will not materially change the overall findings of the submission HRA.
- 1.26 It is anticipated that the submission HRA will be updated alongside the final version of the Plan, including any further modifications or changes to the Plan required as the examination and further hearings progress. The HRA will be finalised at the point of adoption of the Plan. The final HRA will need to incorporate the findings from this (and a previous) addendum. In addition, the update should include reference to the latest work on the GIRAMS, the latest position on nutrient neutrality and the latest advice from Natural England.

Appendix 1: Distance matrix: European sites and allocations

Distances (km) given are the distance from the nearest part of the boundary of the European site to the nearest edge of the allocation.

European Site: (km away)	The Brecks SAC / SPA		Breydon Water SPA / Ramsar		The Broads SAC / SPA / Ramsar		
Allocation	Breckland SAC	Breckland SPA	Breydon Water SPA	Breydon Water Ramsar	Broadland SPA	The Broads SAC	Broadland Ramsar
BLA01B	47.4	41.6	55.8	55.8	35.7	35.4	35.4
C10-1	54.6	51.6	42.6	42.6	21.1	21	21.02
C22-4 (Consolidated)	53.2	50.8	39.8	39.7	18.1	18.1	18.3
HV01C (Consolidated)	45.6	44.2	18.2	18.2	1.7	1.7	1.73
HV06A	46.1	46.2	18.1	17.9	1.7	1.7	1.74
LUD01C (Consolidated)	52.1	52.6	13.1	13.1	1.2	1.2	1.25
MUN03A (Consolidated)	56.9	55.6	32.8	32.8	11.3	11.3	11.3
NW16	51.5	50.4	29	29.1	7.4	7.4	7.6
ST04	55.4	53.1	20.3	20.5	1.5	1.5	2.2
ST19B (Consolidated)	56	53.6	19.7	19.8	1.3	1.4	2.5
BRI02C	38.60	34.0	46.9	46.9	26.1	26.1	26.1

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European Site: (km away)		The Wash SPA / SAC			North Norfolk Coast SAC / SPA		
Allocation	Greater Wash SPA	The Wash SPA	The Wash Ramsar	The Wash & North Norfolk Coast SAC	North Norfolk Coast SPA	North Norfolk Coast SAC	North Norfolk Coast Ramsar
BLA01B	0.2	32.8	32.9	0.3	0.24	0.2	0.2
C10-1	0.23	51.3	51.5	11.1	11.2	11.2	11.2
C22-4 (Consolidated)	1.5	52.6	52.8	12.8	12.8	12.8	12.8
HV01C (Consolidated)	13.8	66.3	66.5	32.5	32.3	32.5	32.3
HV06A	13.6	66.7	66.9	32.9	32.7	32.9	32.7
LUD01C (Consolidated)	9.7	74.1	74.1	38.5	38.4	38.5	38.4
MUN03A (Consolidated)	0.16	61.9	62.1	22.4	22.4	22.4	22.3
NW16	5.3	60.6	62.5	22.7	22.6	22.7	22.6
ST04	4.7	70	71.5	32.8	32.7	32.8	32.7
ST19B (Consolidated)	4.5	70.9	72.4	33.7	33.7	33.7	33.6
BRI02C	11.1	37.7	37.7	11.1	11.1	11.1	11.1

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European Site: (km away)	Roydon Common and Dersingham Bog SAC / Ramsar				
Allocation	Roydon Common and Dersingham Bog SAC	Roydon Common Ramsar	Dersingham Bog Ramsar	Norfolk Valley Fens SAC	Outer Thames Estuary SPA
BLA01B	36.3	38.1	36.3	8.4	56.3
C10-1	53.5	54.1	53.5	3.9	41.9
C22-4 (Consolidated)	54.1	54.3	54.1	5.5	39
HV01C (Consolidated)	60.1	60.7	63.1	13	18.8
HV06A	61.2	61.1	63.5	13.4	18.6
LUD01C (Consolidated)	68.5	68.5	70.8	20.6	12.3
MUN03A (Consolidated)	62.7	62.3	62.7	4.8	31.5
NW16	60.1	59.1	60.1	4.1	28.3
ST04	66.9	66.9	68.5	14	18.8
ST19B (Consolidated)	67.7	67.7	69.3	14.9	18.2
BRI02C	36.4	36.4	36.7	4.9	51.2

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European Site: (km away)	Great Yarmouth North Denes SPA / Winterton-Horsey Dunes SAC				
	Great Yarmouth North Denes SPA	Winterton-Horsey Dunes SAC	Overstrand Cliffs SAC	Paston Great Barn SAC	River Wensum SAC
BLA01B	47.6	47.4	20.3	30.9	14.5
C10-1	30.8	30.7	1.8	13.5	25.2
C22-4 (Consolidated)	28.2	28	1.2	10.8	23.7
HV01C (Consolidated)	15.9	15.4	22.4	15.1	13.4
HV06A	15.6	15.2	22.7	15.2	13.8
LUD01C (Consolidated)	9.8	9.1	26.2	16.9	19.9
MUN03A (Consolidated)	19.3	19.3	7.2	2.2	26.4
NW16	18.3	18.1	10.1	4.1	21.1
ST04	8.7	8.4	19.3	9.6	25.6
ST19B (Consolidated)	8	7.7	20.2	10.5	24.6
BRI02C	41.4	41.2	19.6	26.8	8.8