



North Norfolk Local Plan HRA Addendum relating to Main Modifications, July 2025

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Summary

The North Norfolk Local Plan proposed submission version (Publication Stage, Regulation 19 version, October 2021) was subjected to an appropriate assessment and integrity test according to the statutory provisions laid out in the Habitats Regulations 2017 as amended. That HRA concluded that the North Norfolk Local Plan was in conformity with the Habitats Regulations, and at a plan level a conclusion of no adverse effects, alone or in-combination, on European site integrity could be drawn.

Following examination hearings, a series of modifications to the Plan have been recommended by the Inspector, and these have been verified and agreed with the Council. The Main Modifications are the focus of this addendum.

The modified Plan has been subjected to a complete screening for likely significant effects. As at submission, likely significant effects were identified for urban effects, recreation and hydrological issues. We consider the implications of the modifications on the appropriate assessment findings. We conclude that the Main Modifications do not change the finding of the submission version HRA and instead further strengthen the conclusions. The modified Plan is therefore in conformity with the Habitats Regulations and adverse effects on integrity can be ruled out, alone or in-combination for all European sites.

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Acknowledgements

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1. Introduction

- 1.1 This report is an addendum to the North Norfolk Local Plan Habitats Regulations Assessment (HRA), originally produced by Footprint Ecology in 2021 to accompany the submission version of the North Norfolk Local Plan ('the Plan').
- 1.2 The Plan sets out the strategic planning framework for North Norfolk District and includes policies which determine how land can be used, what can be built and where. Policies make sure that the development needed due to population growth can be provided suitably and sustainably. It also details where new homes, jobs and infrastructure will be created to meet the area's housing, employment and other needs while protecting and enhancing the natural and built environment.
- 1.3 The Plan was submitted to the government in early 2023. Following submission, initial public hearings were held in 2024 and further hearing sessions took place in 2025, focussed on a number of proposed changes to the Plan. Following those hearings, the Inspector has concluded that '*with suitable modifications, it should be possible for a sound Plan to be adopted*'. The letter included a series of initial proposed main modifications, and the final main modifications have now been verified and agreed with the Council for public consultation.

HRA background and previous HRA work

- 1.4 The relevant legislation is the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the 'Habitats Regulations'. Detailed background on the legislation and HRA process are provided in the submission version of the HRA [A4] and are not repeated in full here. The legislation provides statutory protection for Habitats sites such as Special Protection Areas (SPA) classified under the 1979 Birds Directive and Special Areas of Conservation (SAC) designated under the 1992 Habitats Directive. In addition, Ramsar sites are afforded the same level of protection, through long-established Government policy. We use the term 'European site' to refer to both Habitats sites and Ramsar sites.
- 1.5 European sites are the cornerstone of UK nature conservation policy. Public bodies, including local planning authorities, have specific duties in terms of avoiding deterioration of habitats and species for which sites are designated

or classified, and stringent tests have to be met before plans and projects can be permitted. Public bodies are referred to as 'competent authorities' within the legislation.

- 1.6 Footprint Ecology has been commissioned by North Norfolk District Council to undertake the HRA work for the Plan and this work has taken place iteratively, with an update corresponding to each stage of the Plan.
- 1.7 This addendum has been produced to assess the main modifications and the Plan as a whole, i.e. the Plan with the Main Modifications. Our approach is to check the main modifications, in light of the findings in the submission HRA. We undertake a complete screening of the modifications (checking back to the screening outcomes at submission) and identify all policies and plan components where likely significant effects (alone in in-combination) for any European site cannot be ruled out. We then review the appropriate assessment sections of the submission HRA, ensuring these are up to date and complete.
- 1.8 This addendum should therefore be read alongside the submission version of the HRA which includes details of the relevant European sites, a complete screening of the submission version of the Local Plan and appropriate assessment.
- 1.9 Since the submission version was produced, two other addenda have been produced alongside consideration of changes to the Plan. These addenda were undertaken:
- In 2023 relating to a single policy, CC13;
 - In 2024 relating to additional housing sites and revisions to the settlement hierarchy, identified by the Council to address a shortfall in housing.
- 1.10 These addenda, as relevant have been incorporated into this document and therefore this addenda, along with the HRA at submission, provide the complete HRA of the Plan at Main Modifications.

The Main Modifications

- 1.11 The Main Modifications (totalling 68 modifications) are split into Plan policies and allocations. Modifications are numbered sequentially, with modifications 1 – 35 and 66– 68 relating to policies (and appendices etc.) and modifications 36 - 65 relating to individual allocations). Where we refer to a Main

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Modification in tables or specific reference to a numbered modification, we use the abbreviation 'MM'.

2. Screening

Plan Policies

- 2.1 The screening (of plan policies) for likely significant effects is set out in Table 2 below which provides a complete screening of the Plan, including the Main Modifications. For completeness we repeat the screening table from the submission version of the Plan, rather than just the modifications. Greyed-out rows reflect those policies that were screened out at submission and for which there are no modifications proposed. These policies remain screened out. Green shaded rows reflect policies with Main Modifications whereby the policy remains screened out, following the modifications. Red shading reflects policies where there are likely significant effects and include policies where likely significant effects were identified at submission and remain following modifications, and one policy that was screened out at submission but is screened out following Main Modifications.
- 2.2 Policies that are now screened in for likely significant effects, alone or in combination are:
- **Policy CC13 (MM9) Protecting Environmental Quality.** Screened in for consideration at appropriate assessment (hydrological issues) as policy now contains area specific wording and reference to bespoke mitigation relating to River Wensum SAC, Broads SAC and Broadland Ramsar. Policy was not screened in at submission and bespoke mitigation wording added as part of MM9.
 - **Policy SS1 (MM10) Spatial Strategy.** Likely significant effects alone for all relevant European sites and pathways, as policy sets distribution of growth. Policy was screened in at submission.
 - **Policy HC4 (MM14) Infrastructure Provision, Developer Contributions & Viability.** Policy screened in for consideration at appropriate assessment as policy references European site mitigation in relation to recreation (and therefore applies to all relevant European sites where recreation impact pathway identified). MM14 to point h) provide clarification but do not change meaning. Policy was previously screened in at submission.
 - **Policy HOU1 (MM22) Delivering Sufficient Homes.** Likely significant effects alone for all relevant European sites and pathways, as policy (after MM22) sets out quantum of housing according to the settlement hierarchy with an overall minimum level of 9,880 new homes over the plan period.

- **Policy DS1 (MM36) Development site allocations.** Likely significant effects alone for all relevant European sites and pathways, as policy sets distribution of growth. Policy was screened in at submission.

2.3 The screening, in relation to policies is therefore the same as at submission, with the exception of Policy CC13 Protecting Environmental Quality which, as the modification relates to mitigation, must be considered at appropriate assessment.

Table 1: Screening of the Plan Policies at Main Modifications (MMs). Allocations are excluded from the table and screened separately, otherwise the table includes all policies and screening outcomes as set out in the submission version of the HRA, with a further check following the main modifications. Plan sections are emboldened. Those without MMs are shaded pale grey and with grey text. Rows shaded red are those with LSE identified (at main modifications).

Plan Section/Policy (submission version)	Description (from submission version HRA)	LSE screening (submission version of HRA)	MM	Implications of MM for original screening	Commentary relating to MMs
1. Introduction	Introductory text on role of local plan	No LSE admin text	1	None. No LSE	Change in plan timing is academic it is the actual policies and what is proposed that is relevant.
2. Spatial Portrait, Vision, Aims & Objectives	Sets out overall vision and 5 strategic objectives	No LSE, general statements too vague to have a significant effect on specific sites.			
3. Delivering Climate Resilient Sustainable Growth					
Policy CC1 Delivering Climate Resilient Growth	Strategic Policy setting out the principles of climate resilient growth	No LSE - general plan wide climate change policy			
Policy CC2 Renewable & Low Carbon Energy	Policy gives general in-principle support for renewable or sustainable energy schemes	No LSE - policy listing general criteria for acceptability / sustainability of proposals	2	None. No LSE	Modifications include additional wording that strengthens the policy, by specifically referring to European sites and their qualifying features.
Policy CC3 Sustainable Construction, Energy Efficiency & Carbon Reduction	Policy sets out construction standards for new builds to	No LSE - policy listing general criteria for acceptability /	3	None. No LSE	Text changes that have no implications for the HRA.

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Plan Section/Policy (submission version)	Description (from submission version HRA)	LSE screening (submission version of HRA)	MM	Implications of MM for original screening	Commentary relating to MMs
	reduce carbon emissions & follow energy hierarchy	sustainability of proposals			
Policy CC4 Water Efficiency	Policy sets out standards for water efficiency	No LSE - policy listing general criteria for acceptability / sustainability of proposals	4	None. No LSE	Text changes that have no implications for the HRA.
Policy CC5 Coastal Change Management	Policy sets out development constraints within coastal change management areas	No LSE - policy listing general criteria for acceptability / sustainability of proposals	5	None. No LSE	Text changes that have no implications for the HRA.
Policy CC6 Coastal Change Adaptation	Policy sets out principles for relocation of dwellings from coastal change management areas	No LSE - policy listing general criteria for acceptability / sustainability of proposals	6	None. No LSE	Text changes that have no implications for the HRA.
Policy CC7 Flood Risk & Surface Water Drainage	Policy sets out set requirements for sustainable drainage and mitigation of flood risk	No LSE -general plan-wide environmental protection Policy			
Policy CC8 Electric Vehicle Charging	Policy sets out standards for charging point provision	No LSE - policy listing general criteria for acceptability /	7	None. No LSE	Text changes that have no implications for the HRA.

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Plan Section/Policy (submission version)	Description (from submission version HRA)	LSE screening (submission version of HRA)	MM	Implications of MM for original screening	Commentary relating to MMs
		sustainability of proposals			
Policy CC9 Sustainable Transport	Policy sets out how sustainable transport will be achieved	No LSE - policy listing general criteria for acceptability / sustainability of proposals			
Policy CC10 Biodiversity Net Gain	Policy sets out minimum legal targets & compliance with following mitigation hierarchy	No LSE - Policy that cannot lead to development or other change	8	None. No LSE	Text changes that have no implications for the HRA. Biodiversity Net Gain not related to European sites. Nonetheless positive policy in relation to general biodiversity.
Policy CC11 Green Infrastructure	Policy sets out principles of GI creation, enhancement & management & promotes connectivity	LSE - policy listing general criteria for acceptability / sustainability of proposals and also includes proposal intended to avoid or reduce harmful effects on a European site			
Policy CC12 Trees, Hedgerows and Woodland	Policy sets out principles of protection & creation	No LSE - general plan-wide environmental protection			

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Plan Section/Policy (submission version)	Description (from submission version HRA)	LSE screening (submission version of HRA)	MM	Implications of MM for original screening	Commentary relating to MMs
Policy CC13 Protecting Environmental Quality	Policy sets criteria for protection of environmental quality including the natural environment	No LSE - general plan-wide environmental protection	9	Screened in for consideration at appropriate assessment as policy now contains area specific wording and reference to bespoke mitigation relating to River Wensum SAC, Broads SAC and Broadland Ramsar	In accordance with People vs Wind, modifications mean policy must be screened in. Issue covered in 2023 addendum.
4. Spatial Strategy					
Policy SS1 Spatial Strategy	Policy sets out the distribution of growth across district according to the settlement hierarchy	LSE - Policy which may have a likely significant effect on a site alone	10	Screened in (as per submission HRA)	Additional settlements added to policy, however policy already screened in for all relevant impact pathways so no change to screening outcomes.
Policy SS2 Development in the Countryside	Policy sets out the approach to development outside of settlement boundaries	No LSE - policy listing general criteria for acceptability / sustainability of proposals.			

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Plan Section/Policy (submission version)	Description (from submission version HRA)	LSE screening (submission version of HRA)	MM	Implications of MM for original screening	Commentary relating to MMs
Policy SS3 Community-Led Development	Policy sets out criteria for community led development, primarily affordable housing but could also extend to community shops, pubs, allotments, gardens, play areas, orchards, workspace, and renewable energy.	No LSE - general policy listing general criteria for acceptability / sustainability of proposals.			
5. Delivering Well Connected Healthy Communities					
Policy HC1 Health & Wellbeing	Policy setting out the criteria for health impact assessments	No LSE - general policy listing general criteria for acceptability / sustainability of proposals	11	None. No LSE	Text changes that have no implications for the HRA.
Policy HC2 Provision & Retention of Open Spaces	Policy setting out criteria for provision of new open space & protection of existing open space	No LSE - general policy listing general criteria for acceptability / sustainability of proposals	12	None. No LSE	Text changes that have no implications for the HRA.
Policy HC3 Provision & Retention of Local Facilities	Policy sets out criteria for loss of local facilities and new ones	No LSE - general policy listing general criteria for	13	None. No LSE	Text changes that have no implications for the HRA.

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Plan Section/Policy (submission version)	Description (from submission version HRA)	LSE screening (submission version of HRA)	MM	Implications of MM for original screening	Commentary relating to MMs
	meeting the needs of the local community	acceptability / sustainability of proposals			
Policy HC4 Infrastructure Provision, Developer Contributions & Viability	Sets out the strategic approach to provision of social, physical and green infrastructure	LSE - policy listing general criteria for acceptability / sustainability of proposals and also includes proposal intended to avoid or reduce harmful effects on a European site	14	Screened in (as per submission HRA)	Policy wording references European site mitigation. Modifications to point h) provide clarification but do not change meaning.
Policy HC5 Fibre to the Premises (FTTP)	Policy setting requirements for new development and fibre connections	No LSE - general policy listing general criteria for acceptability of proposals	15	None. No LSE	Text changes that have no implications for the HRA.
Policy HC6 Telecommunications Infrastructure	Policy with criteria for telecommunications connections	No LSE - general policy listing general criteria for acceptability of proposals			

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Plan Section/Policy (submission version)	Description (from submission version HRA)	LSE screening (submission version of HRA)	MM	Implications of MM for original screening	Commentary relating to MMs
Policy HC7 Parking Provision	Criteria setting out provision of adequate safe and secure vehicle and cycle parking.	No LSE - general policy listing general criteria for acceptability / sustainability of proposals	16	None. No LSE	Text changes that have no implications for the HRA.
Policy HC8 Safeguarding Land for Sustainable Transport	Policy for safeguarding railway land	No LSE - Policy that cannot lead to development or other change			
6. The Environment					
Policy ENV 1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads	Policy setting out protection of the AONB and the Broads	No LSE - general plan-wide environmental protection/site safeguarding Policy	17	None. No LSE	Text changes that have no implications for the HRA.
Policy ENV2 Protection & Enhancement of Landscape & Settlement Character	Policy setting out protection of landscape character	No LSE - general plan-wide environmental protection/site safeguarding Policy			
Policy ENV3 Heritage & Undeveloped Coast	Policy to protect the appearance and character of the coast.	No LSE - general plan-wide environmental protection/site safeguarding Policy	18	None. No LSE	Text changes that have no implications for the HRA.

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Plan Section/Policy (submission version)	Description (from submission version HRA)	LSE screening (submission version of HRA)	MM	Implications of MM for original screening	Commentary relating to MMs
Policy ENV4 Biodiversity and Geodiversity	Policy addressing protection of designated sites & mitigation through the GIRAMS	No LSE - general plan-wide environmental protection/site safeguarding Policy			
Policy ENV5 Impacts on Internationally Protected Habitats & Species, Recreational Impact Avoidance Mitigation Strategy	Sets out requirement that planning permission will only be granted subject to demonstrating no adverse effects on integrity and sets need to contribute to the GIRAMS.	LSE - policy includes proposal intended to avoid or reduce harmful effects on a European site			
Policy ENV6 Protection of Amenity	Policy to maintain, protect and promote adequate living and working conditions for the District's communities	No LSE - general policy listing general criteria for acceptability / sustainability of proposals	19	None. No LSE	Text changes that have no implications for the HRA.
Policy ENV7 Protecting & Enhancing the Historic Environment	Policy to protect historic environment & heritage assets	No LSE - general policy listing general criteria for acceptability / sustainability of proposals	20	None. No LSE	Text changes that have no implications for the HRA.

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Plan Section/Policy (submission version)	Description (from submission version HRA)	LSE screening (submission version of HRA)	MM	Implications of MM for original screening	Commentary relating to MMs
Policy ENV8 High Quality Design	Policy to provide design principles for improved design and ensure the special character & qualities of North Norfolk are maintained and enhanced.	No LSE - general policy listing general criteria for acceptability / sustainability of proposals	21	None. No LSE	Text changes that have no implications for the HRA.
7. Housing					
Policy HOU1 Delivering Sufficient Homes	Policy setting out quantum of housing according to the settlement hierarchy with an overall minimum level of 9,600 new homes over the plan period	LSE - Policy which may have a likely significant effect on a site alone	22	Screened in (as per submission HRA)	Policy now has total number of dwellings of 9,880 (over period 2024 – 2040) as opposed to 12,096 (over period 2016-2036).
Policy HOU2 Delivering the Right Mix of Homes	Policy addressing the type, size and tenure of homes	No LSE - Policy that cannot lead to development or other change	23	None. No LSE	Text changes that have no implications for the HRA.
Policy HOU3 Affordable Homes in the Countryside (Rural Exceptions Housing)	Policy setting out Proposals for affordable housing development within the designated Countryside Policy Area	No LSE - Policy with general criteria that cannot lead to development or other change			
Policy HOU4 Essential Rural Worker Accommodation	Policy setting out how the LPA will meet the need for essential accommodation associated with	No LSE - Policy with general criteria that cannot lead to			

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Plan Section/Policy (submission version)	Description (from submission version HRA)	LSE screening (submission version of HRA)	MM	Implications of MM for original screening	Commentary relating to MMs
	the use of land for agriculture, forestry and other rural based businesses in locations that would otherwise be judged as unsustainable	development or other change			
Policy HOU5 Gypsy, Traveller & Travelling Showpeople's Accommodation	Policy to meet the needs for both permanently occupied and transit pitches for the gypsy and traveller communities.	No LSE - Policy with general criteria that cannot lead to development or other change	24	None. No LSE	Text changes that have no implications for the HRA.
Policy HOU6 Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation	Policy to manage the visual impacts of proposed replacement dwellings, house extensions and domestic outbuildings on the character of the District	No LSE - Policy with general criteria that cannot lead to development or other change	25	None. No LSE	Text changes that have no implications for the HRA.
Policy HOU7 Re-use of Rural Buildings in the Countryside	The change of use and conversion of existing buildings in the designated Countryside Policy Area to residential and commercial uses		26	None. No LSE	Policy missed in submission HRA screening table. No LSE - Policy with general criteria that cannot lead to development or other change.
Policy HOU8 Accessible & Adaptable Homes	Policy to ensure that new homes are built to accessible and adaptable standards	No LSE - Policy with general criteria that cannot lead to	27	None. No LSE	Text changes that have no implications for the HRA (note policy numbering out of sequence in submission HRA)

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Plan Section/Policy (submission version)	Description (from submission version HRA)	LSE screening (submission version of HRA)	MM	Implications of MM for original screening	Commentary relating to MMs
		development or other change			screening table, corrected here and no implications for screening conclusions.
Policy HOU9 Minimum Space Standards	Policy to ensure that new homes offer a reasonable minimum level of residential amenity and quality of life	No LSE - Policy with general criteria that cannot lead to development or other change	28	None. No LSE	Text changes that have no implications for the HRA (note policy numbering out of sequence in submission HRA screening table, corrected here and no implications for screening conclusions.
8. Economy Sections					
Policy E1 Employment Land	Policy to ensure that a sufficient quantity of land is reserved for employment generating developments across the District	No LSE - general policy listing general criteria for acceptability / sustainability of proposals	29	None. No LSE	Text changes that have no implications for the HRA.
Policy E2 Employment Areas, Enterprise Zones & Former Airbases	Policy to ensure that employment land is protected for employment uses and that proposals for Employment Areas are for acceptable uses.	No LSE - general policy listing general criteria for acceptability / sustainability of proposals			
Policy E3 Employment Development Outside of Employment Areas	Policy setting out criteria for employment sites outside of designated employment areas	No LSE - general policy listing general criteria for acceptability /	30	None. No LSE	Text changes that have no implications for the HRA.

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Plan Section/Policy (submission version)	Description (from submission version HRA)	LSE screening (submission version of HRA)	MM	Implications of MM for original screening	Commentary relating to MMs
		sustainability of proposals			
Policy E4 Retail & Town Centre Development	Policy to maintain and enhance the viability and sustainability of the District's town centres.	No LSE - general policy listing general criteria for acceptability / sustainability of proposals			
Policy E5 Signage & Shopfronts	Policy to seek to avoid the proliferation of advertisements in sensitive locations	No LSE - general policy listing general criteria for acceptability / sustainability of proposals	31	None. No LSE	Text changes that have no implications for the HRA.
Policy E6 New-Build & Extensions to Tourist Attractions and Extensions to Existing Tourist Attractions	To ensure that new-build tourist accommodation, static holiday caravans and holiday lodges are located in appropriate locations & allow flexibility for existing businesses within the countryside the opportunity to expand where appropriate.	No LSE - general policy listing general criteria for acceptability / sustainability of proposals	32	None. No LSE	Text changes that have no implications for the HRA. Policy is general and does not specify any location or quantum.
Policy E7 Touring Caravan & Camping Sites	Policy to ensure that the use of land for touring caravan and	No LSE - general policy listing general criteria for	33	None. No LSE	Text changes that have no implications for the HRA. Policy is general and does not specify any location or quantum.

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Plan Section/Policy (submission version)	Description (from submission version HRA)	LSE screening (submission version of HRA)	MM	Implications of MM for original screening	Commentary relating to MMs
	camping sites is located in appropriate locations.	acceptability / sustainability of proposals			
Policy E8 New-Build & Extensions to Tourist Attractions And Extensions To Existing Tourist Attractions	Policy setting out criteria for allowing new build & extensions to tourist attractions	No LSE - general policy listing general criteria for acceptability / sustainability of proposals	34	None. No LSE	Text changes that have no implications for the HRA. Policy is general and does not specify any location or quantum.
Policy E9 Retaining An Adequate Supply & Mix Of Tourist Accommodation	Policy to retain a mix and supply of all types of tourist accommodation.	No LSE - Policy that cannot lead to development or other change	35	None. No LSE	Text changes that have no implications for the HRA.
Policy DS1 Development Site Allocations	Policy listing the allocated sites for which planning permission will be granted subject to compliance with other policies in the Plan	LSE – Policy which may have a likely significant effect on a site alone	36	Screened in (as per submission HRA)	Policy sets the overall quantum of growth at allocated sites
23 Housing Trajectory			66	None. No LSE	Text changes that have no implications for the HRA. Section sets out housing trajectory and while it gives scale of growth in individual locations these are covered in other policies and this section simply sets out timing

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Plan Section/Policy (submission version)	Description (from submission version HRA)	LSE screening (submission version of HRA)	MM	Implications of MM for original screening	Commentary relating to MMs
Appendix 4: Growth levels in small growth villages			67	None. No LSE	Text changes that have no implications for the HRA. Deletes an appendix (growth levels in small growth villages).
Appendix 6: Strategic Policy identification	Appendix added as part of MMs		68	None. No LSE	Text changes that have no implications for the HRA. Modification is a new appendix identifying strategic policies.

Allocations

2.4 The following modifications relate to the removal of an allocation from the Plan. These allocations were all screened in for likely significant effects at submission and no longer need to be considered as part of the assessment:

- MM37 allocation reference: C07/2;
- MM45 allocation reference: H27/1;
- MM49 allocation reference: NW52;
- MM52 allocation reference: SH07;
- MM57 allocation reference: W07/1;
- MM63 allocation reference: LUD06/A.

2.5 There are 27 allocations¹ included in the site allocations in the final modified plan. These are shown in Map 1 and summarised in

2.6 Table 2. These totals include:

- 21 Residential allocations;
- 5 Mixed-use allocations; and
- 1 Employment allocation.

2.7 All 27 allocations were screened for likely significant effects, checking the pathways considered in the submission version of the HRA. 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 to inform the screening decision):

- Loss of supporting habitat: any allocation within 2km of the Broadland SPA/Ramsar or the North Norfolk Coast SPA/Ramsar.
- General urban effects: any allocation falling within 400m of a European site boundary warranted further checks in GIS.
- 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

¹ note this total of 27 does not include WNS3, an allocation in the adopted Wells Neighbourhood Plan but technically not part of the Local Plan and this HRA. The Local Plan does not allocate the site but it is listed in the Plan trajectory as it is part of the wider development plan and council's housing supply.

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 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.

2.8 There were no likely significant effects from loss of supporting habitat identified for any allocation. This impact pathway was initially considered in the submission HRA as potentially relevant for certain European sites. There can be areas outside the boundary of European sites that are likely to be important for mobile qualifying features and risks through the loss, deterioration, or compromise of habitat outside a European site boundary that serves a supporting role for the European site, for example as roosting or foraging sites. In North Norfolk the issues are relevant for the following European sites:

- **North Norfolk Coast SPA:** land outside the SPA may provide foraging localities for wintering Pink-footed and Dark-bellied Brent Geese, and breeding localities for Marsh Harrier.
- **Broadland SPA/Ramsar:** agricultural land outside the SPA boundary may provide foraging habitat for swans.

2.9 In the submission HRA no allocations were identified where there could be likely significant effects from loss of supporting habitat. All modifications were further checked as part of this screening (focussing on those within 2km of the above European sites as a guide to highlight the greatest risk), using aerial imagery and the allocation boundaries within GIS and drawing on our local knowledge of the general area and the ecology of the relevant species. All allocations in the proximity of the above European sites were small and involved sites that were already surrounded on multiple sides by housing, roads, footpaths and trees. As such none of the sites were likely to be functionally-linked to the European sites and likely significant effects could be eliminated from loss of supporting habitat.

2.10 In the submission HRA, air quality was ruled out at submission due to the largely rural nature of the roads, scattered nature of the development and lack of vulnerable qualifying features present in the areas of European sites

that were in 200m of the road network. None of the modifications result in any need to change this conclusion.

- 2.11 In line with the submission HRA there are no relevant impact pathways and no likely significant effects with respect to Overstrand Cliffs SAC or Paston Great Barn SAC.
- 2.12 Likely significant effects therefore relate to general urban effects, recreation and hydrological issues and, as with the submission version of the HRA, these are taken forward to appropriate assessment. These pathways are cross-referenced to allocations in Table 2.

Map 1: All allocations in the modified plan

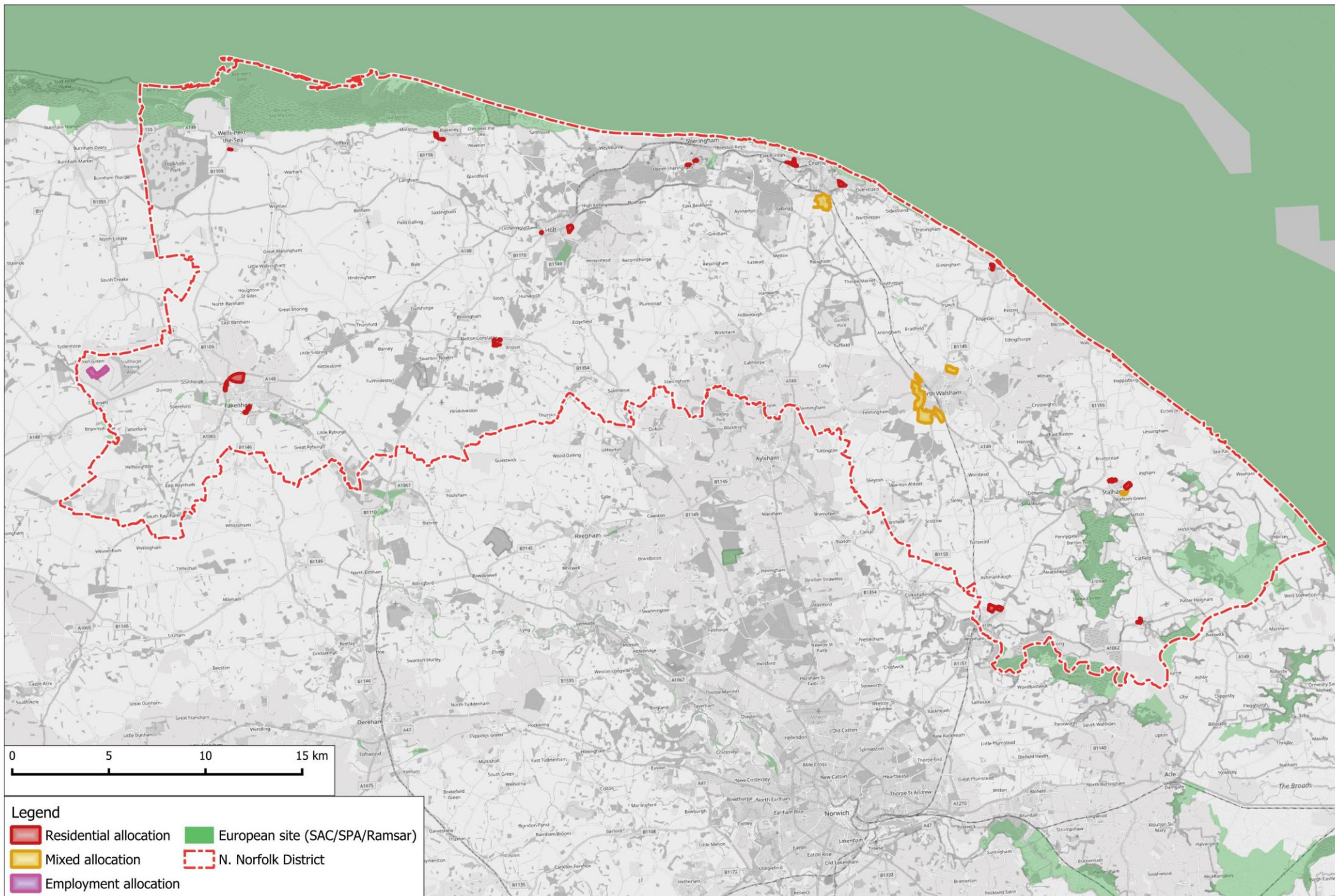


Table 2: Screening of allocations (all allocations in modified plan). All allocations trigger likely significant effects alone (a) or in-combination (i/c) for at least one pathway. Grey shaded rows indicate those where there are no modifications (and therefore no change from submission). Allocations listed in alphabetical order.

Allocation	Settlement	Name	Allocation Details	MM	General urban effects	Recreation	Hydrological impacts	Commentary
BLA04/A	Blakeney	Land East of Langham Road, Blakeney	Approx 30 dwellings, open space and supporting infrastructure.	59	i/c	a		Site close to North Norfolk Coast SPA/Ramsar but directly fringing Blakeney and largely surrounded by housing, so no risks from loss of supporting habitat. General urban effects on precautionary basis as in-combination risks given proximity to European site and other allocation in Blakeney. Particular proximity to coast means recreation triggered alone.
BLA01/B	Blakeney	Land to the West of Langham Road	Approx 30 dwellings, open space and supporting infrastructure.	58	i/c	a		Site close to North Norfolk Coast SPA/Ramsar but directly fringing Blakeney and largely surrounded by housing, so no risks from loss of supporting habitat. General urban effects on precautionary basis as in-combination risks given proximity to European site and other allocation in Blakeney. Particular proximity to coast means recreation triggered alone.
BRI01	Briston	Land East of Astley School, Briston.	Approx 25 dwellings, open space, school parking and supporting infrastructure.	60		i/c	a	Within catchment of Broadland SAC/the Broads Ramsar, therefore screened in for hydrological issues (water quality)
BRI02/C	Briston	Land at Astley Primary School	Approx 90 dwellings, school parking, open space and supporting infrastructure.	61		a	a	Within catchment of Broadland SAC/the Broads Ramsar, therefore screened in for hydrological issues (water quality)

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Allocation	Settlement	Name	Allocation Details	MM	General urban effects	Recreation	Hydrological impacts	Commentary
C16	Cromer	Former Golf Practice Ground, Overstrand Road, Cromer	Approx 150 dwellings, 60 units/40 dwellings equivalent of elderly care accommodation, open space and supporting infrastructure.	38		a		
C22/4	Cromer	Land West of Pine Tree Farm, Cromer	Approx 500 dwellings, sports facilities, open space, 100 units/67 dwellings equivalent of elderly care accommodation and supporting infrastructure.	39		a	a	Within catchment of Broadland SAC/the Broads Ramsar, therefore screened in for hydrological issues (water quality)
C10/1	Cromer	Land at Ronton Road/Clifton Park	Approx 70 dwellings, open space and supporting infrastructure.	40		a		
F01/B	Fakenham	Land North of Rudham Stile Lane, Fakenham	Approx 560 dwellings, open space, 100 units/67 dwellings equivalent of elderly care accommodation and supporting infrastructure.	41		a	a	Within catchment of River Wensum SAC, therefore screened in for hydrological issues (water quality)
F02	Fakenham	Land Adjacent to Petrol Filling Station, Wells Road	Approx 70 dwellings, open space and supporting infrastructure.			a	a	Within catchment of River Wensum SAC, therefore screened in for hydrological issues (water quality)
F03	Fakenham	Land at Junction of A148 and B1146, Fakenham	Approx 65 dwellings, open space and supporting infrastructure.	42		a	a	Within catchment of River Wensum SAC, therefore screened in for hydrological issues (water quality). Screened in alone for water quality issues due to proximity to River Wensum and risk of contamination and run-off

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Allocation	Settlement	Name	Allocation Details	MM	General urban effects	Recreation	Hydrological impacts	Commentary
F10	Fakenham	Land South of Barons Close, Fakenham	Approx 55 dwellings, new public park and supporting infrastructure.	43		a	a	Within catchment of River Wensum SAC, therefore screened in for hydrological issues (water quality). Screened in alone for water quality issues due to proximity to River Wensum and risk of contamination and run-off
H17	Holt	Land North of Valley Lane, Holt	Approx 27 dwellings, open space and supporting infrastructure.			i/c		
H20	Holt	Land at Heath Farm, Holt	Approx 180 dwellings, 60 units/40 dwellings equivalent of elderly care accommodation, open space and supporting infrastructure.	44	a	a		LSE alone for Norfolk Valley Fens SAC and general urban effects
HV01/C	Hoveton	Land East of Tunstead Road, Hoveton	Approx 150 dwellings, 60 units/40 dwellings equivalent of elderly care accommodation open space and supporting infrastructure.	46		a	a	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. Within catchment of Broadland SAC/the Broads Ramsar, therefore screened in for hydrological issues (water quality)
HV06/A	Hoveton	Land East of Tunstead Road	Approx 50 dwellings, open space and supporting infrastructure.	47		a	a	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. Within catchment of Broadland SAC/the Broads Ramsar, therefore screened in for hydrological issues (water quality)

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Allocation	Settlement	Name	Allocation Details	MM	General urban effects	Recreation	Hydrological impacts	Commentary
LUD01/C	Ludham	Land South of School Road, Ludham	Approx 60 dwellings, open space and supporting infrastructure.	62		a	a	Site on edge of Ludham village and surrounded on 3 sides by housing. No risks in relation to foraging habitat for swans. Outside Nutrient Neutrality catchment for the Broads but screened in for hydrological issues due to capacity issues at the WRC and sewerage issues.
NW01	North Walsham	Land at Norwich Road & Nursery Drive, North Walsham	Approximately 350 dwellings, 100 units/67 dwellings equivalent of elderly care accommodation, open space, retention of existing commercial uses and supporting infrastructure.	48		a	a	Within catchment of Broadland SAC/the Broads Ramsar, therefore screened in for hydrological issues (water quality)
NW16	North Walsham	Land at Paston Gateway	Approx 330 dwellings, 60 units/40 dwellings equivalent of elderly care accommodation, open space and supporting infrastructure.	51		a	a	Within catchment of Broadland SAC/the Broads Ramsar, therefore screened in for hydrological issues (water quality)
NW62/A	North Walsham	Land West of North Walsham	Sustainable Urban Extension comprising approx. 1,800 dwellings, 300 units/200 dwellings equivalent of elderly care accommodation, employment land, neighbourhood centre, primary school, health facilities, open spaces, and supporting infrastructure.	50		a	a	Site includes a number of large fields but these are all directly adjacent to housing and well away from European sites, so no risks from loss of supporting habitat. Within catchment of Broadland SAC/the Broads Ramsar, therefore screened in for hydrological issues (water quality)

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Allocation	Settlement	Name	Allocation Details	MM	General urban effects	Recreation	Hydrological impacts	Commentary
MUN03/A	Mundesley	Land off Cromer Road & Church Lane, Mundesley	Approx 45 dwellings, open space and supporting infrastructure.	64		i/c		
SH04	Sheringham	Land adjoining Seaview Crescent, Sheringham	Approx 45 dwellings, open space and supporting infrastructure.			i/c		
SH18/1B	Sheringham	Land South of Butts Lane, Sheringham	Approx 48 dwellings, open space and supporting infrastructure.	53		i/c		
ST19/B	Stalham	Land Adjacent Ingham Road.	Approx 150 dwellings, open space and supporting infrastructure.	55		a	a	Site is relatively close to Broadland SPA/Ramsar but checks of aerial photos indicate site unlikely foraging habitat for swans. Within catchment of Broadland SAC/the Broads Ramsar, therefore screened in for hydrological issues (water quality). Policy wording highlights capacity constraints at WRC.
ST04/A	Stalham	Land at Brumstead Road/Calthorpe Close.	Approx 45 dwellings, public open space and supporting infrastructure.	56		i/c	a	Site is relatively close to Broadland SPA/Ramsar but checks of aerial photos indicate site unlikely foraging habitat for swans. Within catchment of Broadland SAC/the Broads Ramsar, therefore screened in for hydrological issues (water quality). Policy wording highlights capacity constraints at WRC.
ST23/2	Stalham	Land North of Yarmouth Road, East of	Approx 80 dwellings, employment land, open space and supporting infrastructure.	54		a	a	Site is relatively close to Broadland SPA/Ramsar but checks of aerial photos indicate site bordered on 2 sides by housing and comprises small fields with

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Allocation	Settlement	Name	Allocation Details	MM	General urban effects	Recreation	Hydrological impacts	Commentary
		Broadbeach Gardens, Stalham						large trees around edge and some scrub, unlikely foraging habitat for swans. Within catchment of Broadland SAC/the Broads Ramsar, therefore screened in for hydrological issues (water quality). Policy wording highlights capacity constraints at WRC.
W01/1	WELLS-next-the-Sea	Land South of Ashburton Close, Wells-next-the-sea	Approx 20 dwellings and supporting infrastructure.			i/c		Site adjacent to existing housing and school and therefore no likelihood of being used by qualifying features of the North Norfolk Coast SPA/Ramsar. Site already has planning permission.
TAT01	Tattersett	Tattersett Business Park	Employment allocation	65				

3. Appropriate assessment: General urban effects

Relevant policies and sites from the screening (modifications and submission)

- 3.1 The following policies were screened in for likely significant effects alone at submission, with respect to urban effects and the Norfolk Valley Fens SAC. The Main Modifications do not affect these screening decisions:
- DS1 Development site allocations screened in alone for the Norfolk Valley Fens SAC;
 - HOU1 Delivering sufficient homes screened in alone for the Norfolk Valley Fens SAC;
 - SS1 Spatial strategy screened in alone for the Norfolk Valley Fens SAC.
- 3.2 Screening at submission also identified likely significant effects for the following allocations alone in relation to general urban effects:
- H20, Holt, residential allocation for around 150 dwellings (at its closest around 440m from the Norfolk Valley Fens SAC);
 - H27/1, Holt, employment allocation (at its closest around 160m from the Norfolk Valley Fens SAC).
- 3.3 H27/1 has now been deleted from the Plan (MM45) and is therefore no longer relevant to the HRA.
- 3.4 The submission HRA also noted that F10 at Fakenham was directly adjacent to the River Wensum and the issues relating to the direct proximity of this site to the SAC relate primarily to hydrology and urban effects for this site were therefore considered at appropriate assessment alongside other hydrological issues.
- 3.5 As a result of the Main Modifications, two additional allocations have been screened in for urban effects with respect to the North Norfolk Coast SAC/SPA/Ramsar and the Wash and North Norfolk Coast SAC. These are the two allocations at Blakeney, BLA04/A and BLA01/B, for which likely significant effects are in-combination. These are the only elements of the modified Plan that need further consideration in this addendum.

Blakeney (BLA04/A and BLA01/B)

3.6 BLA04/A was included in the submission version of the Plan, however likely significant effects were not identified for urban effects as that site is over 500m from any European site. BLA01/B is, at its closest, around 300m from the North Norfolk Coast SAC/SPA/Ramsar and the Wash and North Norfolk Coast SAC. The two allocations together lie either side of Langham Road and each total around 30 dwellings, giving a cumulative total of around 60 new dwellings. The two allocations are shown in Map 2.

3.7 Given the proximity to the European sites, risks could include:

- Cat predation, relevant to breeding bird interest of the North Norfolk Coast SPA;
- Spread of invasive species (e.g. dumping of garden waste, spread from gardens), relevant to all SAC and Ramsar habitats;
- Fire risk (e.g. garden bonfires, fireworks etc.), relevant to all SAC and Ramsar habitats;
- Light pollution relevant to bird interest of the North Norfolk Coast SPA/Ramsar.

3.8 These risks have the potential to undermine the conservation objectives in terms of the populations of qualifying features, distribution of qualifying features and the structure and function of qualifying natural habitats. Nonetheless, it can be seen from Map 2 that the allocations are largely contiguous with existing housing and separated from the European site boundaries by the A149, fields and existing housing. The risks are therefore low. The A149 will act as a barrier for cats which would further have to cross extensive saltmarsh and creeks and Blakeney Harbour in order to reach the areas with concentrations of breeding birds (on Blakeney Point). There is no direct access from the allocation sites to the European site boundary and therefore dumping of garden waste is not a concern. Garden plants could spread, however the conditions on the saltmarsh and coastal habitats will mean they are highly unlikely to establish. The supplementary conservation advice produced by Natural England for the saltmarsh feature (closest habitat to the allocations) for the Wash and North Norfolk SAC² states that there are no undesirable species known to be present. The advice for the

2

<https://designatedsites.naturalengland.org.uk/ConservationAdvice/SupplementaryAdvice.aspx?SiteCode=UK0017075&SiteName=norfolk&SiteNameDisplay=The+Wash+and+North+Norfolk+Coast+SAC&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=2>

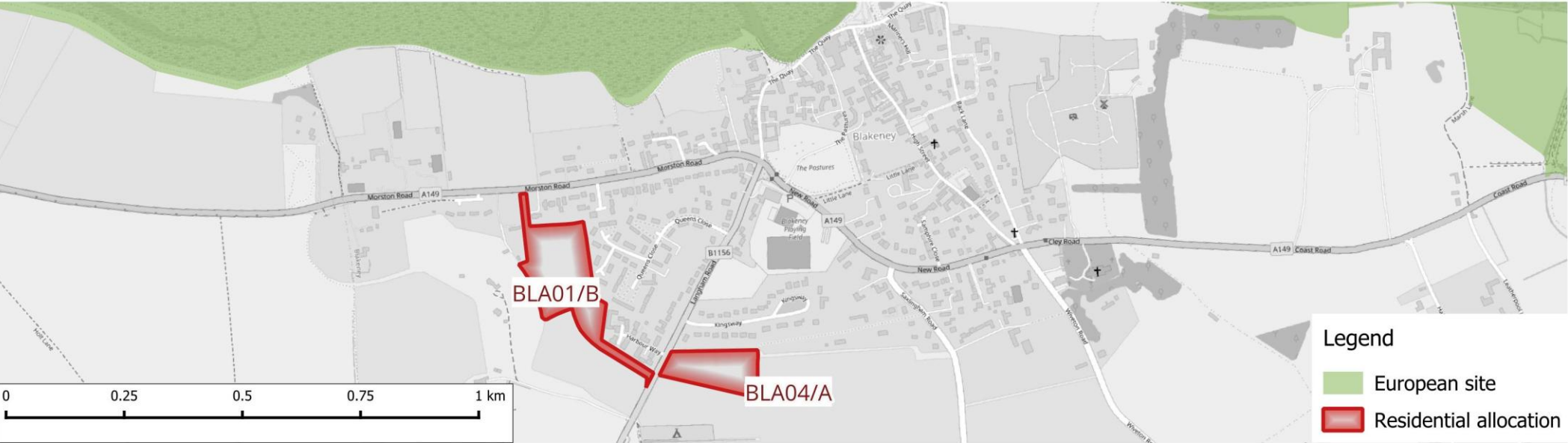
Mediterranean and thermos-Atlantic halophilous scrub feature of the North Norfolk Coast SAC³ is similar. This advice would suggest there have been no problems associated with the spread of garden plants to date.

- 3.9 The risk of fire spreading from development, for example as a result of fireworks, is clearly low. Light pollution could be a concern if there are bright lights, taller buildings or light spreads onto neighbouring fields (which wintering waterbirds may occasionally use at night). Such issues simply need to be checked at project level to ensure site design addresses any risks. The policy wording for BLA01/B (set out in MM58) ensures development is concentrated in the area abutting the existing housing and includes requirements for a landscaping buffer along Morston Road (where the allocation is closest to the European site boundaries). European sites are mentioned under the constraints. As such risks at plan level can be removed through reliance on project level HRA.
- 3.10 With the low risks resolved for BLA01/B, they are also addressed for BLA04/A, as features such as the landscaping will ensure all housing further screened from the European sites. Given the very specific locale, further in-combination effects from other elements of the Plan or other plans or projects can be ruled out.

3

<https://designatedsites.naturalengland.org.uk/ConservationAdvice/SupplementaryAdvice.aspx?SiteCode=UK0019838&SiteName=norfolk&SiteNameDisplay=North+Norfolk+Coast+SAC&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=1>

Map 2: Blakeney allocation



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4. Appropriate assessment: Recreation

Relevant policies and sites from the screening (modifications and submission)

- 4.1 The following policies set the overall quantum of growth and distribution across North Norfolk, and were therefore screened in alone for recreation at submission and the Main Modifications do not change this outcome:
- Policy SS1(MM10) Spatial Strategy.
 - Policy HOU1 (MM22) Delivering Sufficient Homes.
 - Policy DS1 (MM36) Development site allocations.
- 4.2 In addition, Policy HC4 (MM14) Infrastructure Provision, Developer Contributions & Viability sets out mitigation measures (GIRAMS) intended to avoid or reduce harmful effects on a European site. In line with the submission HRA, therefore needs to be considered at appropriate assessment and was not taken into account as part of the screening. The Main Modifications do not change this outcome.
- 4.3 Relevant European sites for which the above policies each trigger likely significant effects alone are: Breckland SPA, Broadland SPA, Broadland Ramsar, Great Yarmouth North Denes SPA, North Norfolk Coast SAC, North Norfolk Coast SPA, North Norfolk Coast Ramsar, Norfolk Valley Fens SAC, The Broads SAC, The Wash & North Norfolk Coast SAC, The Wash SPA, The Wash Ramsar, Winterton-Horsey Dunes SAC. This list of sites is slightly reduced from that originally identified in the submission HRA as the GIRAMS action plan (Liley et al., 2024) provides updated evidence on the relevant European sites and approximate zones of influence that could be applied to each. The zone distances for individual European sites and quantum of growth proposed within each zone are summarised in Appendix 2.
- 4.4 It is important to recognise that the GIRAMS doesn't use these zones to set a tariff or trigger likely significant effect, instead it is based on a single, Norfolk-wide tariff approach and single overall zone of influence. This ensures all development contributes in a simple way and avoids the problems created by multiple overlapping zones of influence and complex local geography. Appendix 2 is therefore useful in summarising which

European sites might see the greatest uplift in recreation use as a result of the Plan, but should be used as a guide only.

- 4.5 All allocations were screened in at submission and remain screened in following Main Modifications. In-line with Natural England advice, all large allocations (above 50 dwellings) trigger likely significant effects for recreation alone and also any allocations in particular close proximity (within 500m) of a European site were reviewed. Taking into account the approximate dwelling numbers in the Main Modifications, this now means multiple allocations are screened in for recreation alone (see Table 2).

Mitigation

- 4.6 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) ensure the package of mitigation measures relates to the scale and distribution of growth likely to come forward across the whole county. The GIRAMS is in place, working at a county level and secured in as detailed in Policy ENV 5 Impacts on International & European sites: Recreational Impact Avoidance & Mitigation Strategy. Supporting text (e.g. paragraph 6.5.3) sets out the mitigation requirements and provides more background. This policy has not been subject to any modification.
- 4.7 Large developments (above 50 dwellings) require additional mitigation (alongside contribution to GIRAMS) in the form of enhanced green infrastructure. To ensure compliance with this advice, policy wording for each relevant allocation secures sufficient and appropriate green infrastructure and Policy ENV5 and supporting text provides the strategic context and overarching requirements. The precise details, scale and design of this green infrastructure will be assessed at project-level through project-level HRA.
- 4.8 Allocation BLA01/B and BLA04/A in Blakeney are particularly close to the coast (see Map 2) and this proximity to the European sites means there are particular risks for these allocations. As with the larger developments, policy wording ensures the layout will include green infrastructure and this can be checked through project level HRA.

- 4.9 New open space, or improvements to existing areas, will be secured for all relevant developments through planning conditions and/or section 106 planning obligations attached to the grant of planning permission in line with requirements in the Plan including Policy CC 11 Green Infrastructure, Policy HC2 Provision & Retention of Open Spaces and Policy ENV 5 Impacts on International & European sites: Recreational Impact Avoidance & Mitigation Strategy.

5. Hydrological impacts

Relevant policies and sites from the screening (modifications and submission)

- 5.1 In the submission version of the HRA, Policy CC13 was screened out for likely significant effects, as it related to general plan-wide environmental protection. Following MM9, the policy now contains a clause setting out area specific wording and reference to bespoke mitigation relating to European sites:

“All development involving a net increase in overnight stays located within the catchments of the River Wensum Special Area of Conservation (SAC), Broads SAC and the Broadland Ramsar must provide evidence to enable the Local Planning Authority to conclude through a Habitats Regulation Assessment that the proposal, in combination with other plans and projects, will not have an adverse effect on the integrity of the habitats concerned. Proposals that fail to demonstrate nutrient neutrality will not be permitted”

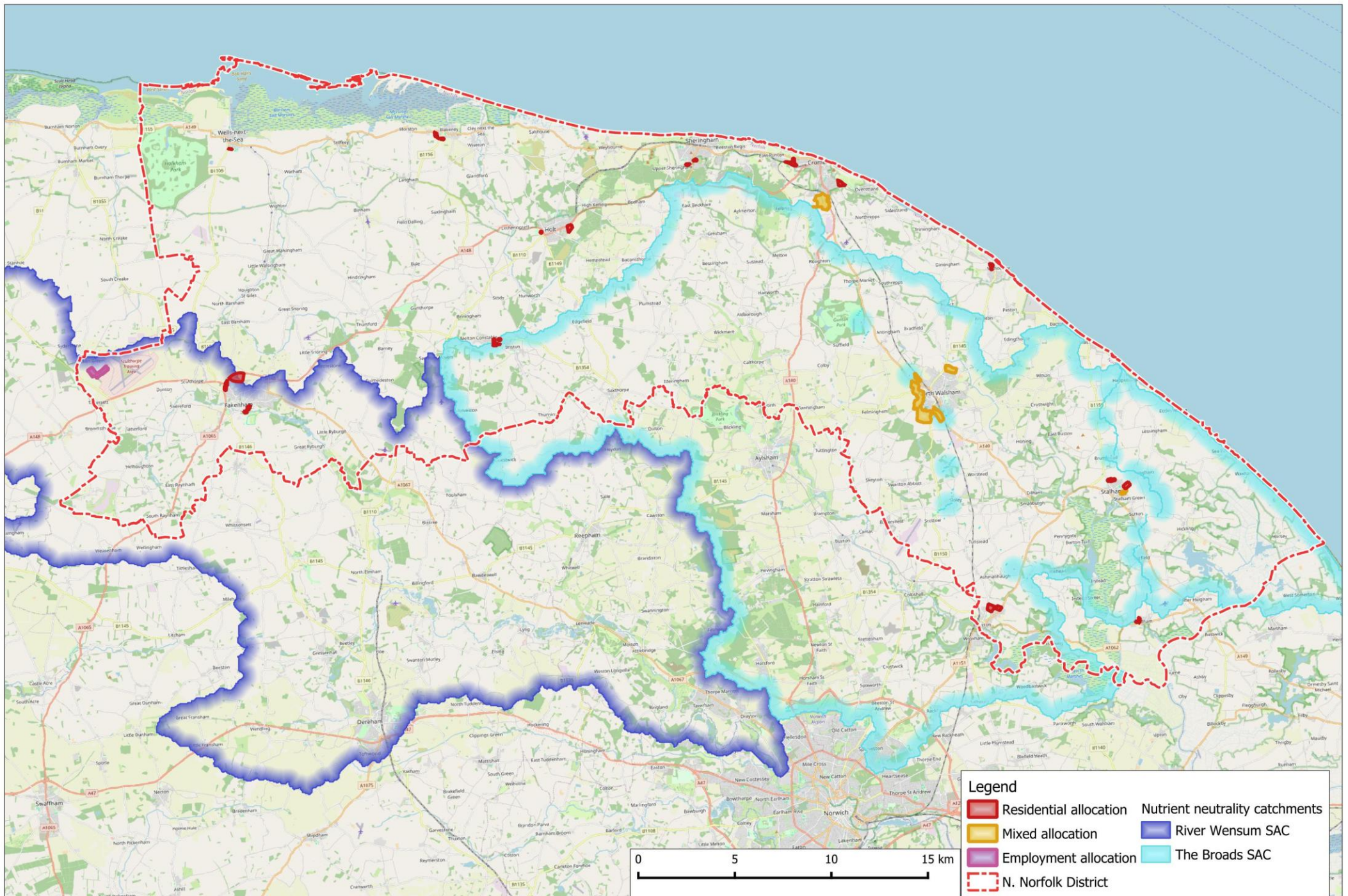
- 5.2 Following the ruling in People over Wind this policy cannot be taken into account in the formal screening and must therefore be screened in for further consideration as part of an appropriate assessment.
- 5.3 The modification to CC13 leads to a conclusion that, without mitigation, all qualifying development proposals located within the catchments of the River Wensum Special Area of Conservation (SAC), the Broads SAC and the Broadland Ramsar will have a likely significant effect alone on the respective European sites.
- 5.4 Allocations that fall into these catchments are summarised in Table 3 and the catchments are shown in Map 3. Map 3 shows the catchments for the Broads with respect to the Upper Thurne Broads and Marshes, Ant Broads and Marshes and the Bure Broads and Marshes only, as these are the areas relevant to North Norfolk.

Table 3: Allocations within each nutrient neutrality catchment or where hydrological issues relevant. Dwellings figure for each allocation includes elderly care home (dwellings equivalent) where relevant

Allocation	Settlement	Name	Approx. dwellings	Catchment
BRI01	Briston	Land East of Astley School, Briston.	25	Broads
BRI02/C	Briston	Land at Astley Primary School	90	Broads
C22/4	Cromer	Land West of Pine Tree Farm, Cromer	567	Broads
HV01/C	Hoveton	Land East of Tunstead Road, Hoveton	190	Broads
HV06/A	Hoveton	Land East of Tunstead Road	50	Broads
NW01/B	North Walsham	Land at Norwich Road & Nursery Drive, North Walsham	417	Broads
NW16	North Walsham	Land at Paston Gateway	370	Broads
NW62/A	North Walsham	Land West of North Walsham	2000	Broads
ST19/B	Stalham	Land Adjacent Ingham Road.	150	Broads
ST04/A	Stalham	Land at Brumstead Road/Calthorpe Close.	45	Broads
ST23/2	Stalham	Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	80	Broads
F10	Fakenham	Land South of Barons Close, Fakenham	55	River Wensum SAC
F01/B	Fakenham	Land North of Rudham Stile Lane, Fakenham	627	River Wensum SAC
F02	Fakenham	Land Adjacent to Petrol Filling Station, Wells Road	70	River Wensum SAC
F03	Fakenham	Land at Junction of A148 and B1146, Fakenham	65	River Wensum SAC

5.5 Note that Table 3 does not include LUD01/C which lies just outside the nutrient neutrality catchment for the Broads. However, this allocation was screened in for hydrological issues due to capacity issues at the WRC and sewerage issues (storm overflows). Similar concerns around capacity also exist for ST23/2, ST19/B and ST04/A. In addition, F10 directly abuts the River Wensum SAC and therefore risks with that site relate to direct run-off and contamination.

Map 3: Allocations in the modified plan in relation to nutrient neutrality catchments (downloaded from the Natural England website)



- 5.6 Besides the individual allocations, likely significant effects alone are identified for the overall quantum of growth, as set out in:
- DS1 Development site allocations;
 - HOU1 Delivering sufficient homes (which in addition to the allocations includes windfall and small growth villages);
 - SS1 Spatial strategy.
- 5.7 The above policies also triggered likely significant effects with respect to hydrology in the submission version of the HRA. These policies set the overall quantum of growth and distribution. It can be seen from Table 3 that the allocations on their own (i.e. excluding windfall etc) total 3,984 dwellings within the Broads catchment and 817 within the Wensum SAC catchment.

Mitigation

- 5.8 The Main Modification to CC13 results in strengthened wording regarding the need for selected developments to address water quality impacts. The Modification to CC13 now ensures clear criteria in the policy that development will not be permitted unless nutrient neutrality at least is demonstrated. This will be determined by the Council through project level HRA. The criteria applies to all development requiring overnight stays and located within the catchments of the River Wensum SAC, the Broads SAC and the Broadland Ramsar.
- 5.9 The Policy does not rely on particular mitigation measures, and this is important. For plan-level HRA, case law demonstrates that the Local Planning Authority needs to be satisfied that the mitigation being relied upon is achievable. For example, in the case of the New Adastral New Town Ltd (NANT)⁴, the important question for the court of appeal was whether there was sufficient information at the Plan stage to enable the Council to be duly satisfied that the proposed mitigation could be achieved in practice.
- 5.10 North Norfolk Council provides detailed background and information on its website for applicants, providing information nutrient calculations, mitigation options and advice. To support nutrient neutral development, the supporting text for Policy 13 states that Norfolk authorities are producing a “Nitrates and Phosphates Mitigation Strategy” for the River Wensum and The

⁴ No Adastral New Town Ltd (NANT Ltd) v Suffolk Coastal District Council, Court of Appeal, 17 Feb 2015

Broads SAC and Broadland Ramsar catchments. This will identify short-, medium- and long-term mitigation solutions. The strategy is likely to include a tariff system to fund mitigation measures that will offset additional nutrient discharges from new development. Applicants may propose other types of mitigation. At this stage therefore, it would seem likely that mitigation is achievable, but will vary according to each development, however at this point in time it is not secured and cannot be relied on.

- 5.11 The Modification to Policy CC13 therefore addresses the uncertainty, as the presumption is that development will not take place, rather than stating development will be permitted with particular mitigation in place.

Allocation F10 at Fakenham

- 5.12 Allocation F10, at Fakenham, abuts the River Wensum SAC, and there are therefore risks with direct contamination, run-off etc. This issue was considered in the submission HRA and the Main Modifications do not change the plan in any way that might affect the conclusions in the submission HRA.

Sewerage capacity

- 5.13 The submission HRA identified that, for certain Water Recycling Centres (WRCs), capacity issues had been identified. Risks relate to storm overflows and the volume of water that these WRCs are licenced to accommodate. Specific wording is included in the Main Modifications with respect to allocations ST23/2, ST19/B, ST04/A and LUD01/C around sewerage capacity. This wording ensures, for each allocation, that permission will be dependent on sufficient information on issues relating to sewerage infrastructure and hydrological issues are provided so as to ensure that project-level HRA will be able to rule out adverse effects on the integrity of the protected sites.

6. Formal integrity test

- 6.1 This addendum should be read alongside the submission version HRA. The North Norfolk Local Plan proposed submission version (Publication Stage, Regulation 19 version, October 2021) was subjected to an appropriate assessment and integrity test according to the statutory provisions laid out in the Habitats Regulations 2017 as amended. That HRA concluded that the North Norfolk Local Plan was in conformity with the Habitats Regulations, and at a plan level a conclusion of no adverse effects, alone or in-combination, on European site integrity could be drawn.
- 6.2 The Main Modifications have been subject to further checks through this addendum. The Main Modifications do not change the finding of the submission version HRA and instead further strengthens the conclusions, for example in light of evidence regarding nutrient neutrality.
- 6.3 The Main Modifications include an additional allocation at Blakeney (BLA01/B) which is alongside allocation BLA04/A (which was included in the Plan at submission). These two allocations together total around 60 dwellings and BLA01/B is particularly close to the coastal European sites – the North Norfolk Coast SAC/SPA/Ramsar and the North Norfolk Coast and the Wash SAC. In light of the Main Modifications these allocations were screened in for general urban effects, such as cat predation and light pollution relating to the proximity of housing to the European site boundaries. Appropriate assessment ascertained relatively low risks and policy wording ensures site specific checks and project level HRA. This removes risks and no further in-combination assessment is required given the very local and specific issue and lack of other growth in the Plan in the vicinity.
- 6.4 Adverse effects on integrity can be ruled out from recreation for the overall level of growth, relevant strategic policies and each allocation, alone or in-combination. Modifications have been checked and all large developments (over 50) are required through policy to provide enhanced green infrastructure to provide for local recreation needs. The county-wide GIRAMS sets out the requirements for such infrastructure and also ensures an approach for strategic mitigation ensuring the in-combination effects of development are addressed. The submission HRA also relied on the GIRAMS to provide the necessary mitigation for all growth across the District.

- 6.5 The Main Modifications (MM9, relating to Policy CC13) require development to demonstrate nutrient neutrality within the catchments of the River Wensum SAC, the Broads SAC and the Broadland Ramsar. This ensures impacts from water quality are avoided. In addition, policy wording for individual allocations ensure necessary checks on local sewerage capacity are in place before development takes place. These measures ensure adverse effects alone from all policies in the modified Plan with respect to water quality and European site integrity are eliminated. Given that there is no impact from development, in-combination effects are also ruled out.

Appendix 1: Distance matrix of European sites and allocations

For completeness, we give the distance (km) from all allocations in the modified plan to all European sites within a 20km radius of the North Norfolk boundary. The matrix is split into two to allow it to fit more easily on the page. The top half is European sites starting with letters between A and N, the second half O – Z.

Site ref	Site type	Breckland SPA	Breydon Water RAMSAR	Breydon Water SPA	Broadland RAMSAR	Broadland SPA	Dersingham Bog RAMSAR	Great Yarmouth North Denes SPA	Greater Wash SPA	Haisborough, Hammond and Winterton SAC	Inner Dowsing, Race Bank and North Ridge SAC	N Norfolk Coast SPA	Norfolk Valley Fens SAC	North Norfolk Coast RAMSAR	North Norfolk Coast SAC
C16	Residential	52.4	40.3	40.3	18.7	18.7	55.6	28	0.5	16.9	30.2	13.7	6.3	13.7	13.7
ST19/B	Residential	57.1	19.8	19.8	1.4	1.4	69.4	8	4.5	15.3	51.8	33.7	14.9	33.7	33.8
F02	Residential	24.6	58.1	58.1	37.3	37.3	22.7	55.1	13.1	50.1	31.4	13	18.2	13	13
SH04	Residential	48	45.8	45.8	24.3	24.3	48.6	35.1	1.2	23.1	24.2	6.1	0.5	6.1	6.2
BRI02/C	Residential	34	46.8	46.8	26.1	26.1	36.7	41.4	10.8	36.5	28.2	10.8	4.9	10.8	10.8
ST04/A	Residential	56.4	20.3	20.3	1.5	1.5	68.5	8.8	4.8	15.9	51	32.8	14.1	32.8	32.9
H20	Residential	41	47.6	47.6	27.2	27.2	41.4	39.5	5	30.4	23.7	4.8	0.4	4.8	4.9
F03	Residential	24.8	58.2	58.2	37.3	37.3	22.7	55.1	12.7	50	31	12.7	18	12.7	12.7
C10/1	Residential	51.2	42.5	42.5	20.9	20.9	53.2	30.6	0.2	18.5	27.5	10.8	3.5	10.8	10.8
HV06/A	Residential	48.8	18	18	1.7	1.7	63.5	15.6	13.6	24	52	32.7	13.4	32.7	32.9
BLA04/A	Residential	41.6	55.6	55.6	35.3	35.3	36.5	47.4	0.6	35.4	17.5	0.5	8.2	0.5	0.5
HV01/C	Residential	48.4	18.2	18.2	1.7	1.7	63.1	15.9	13.7	24.2	51.7	32.4	13	32.4	32.5
F01/B	Residential	25.2	57.5	57.5	36.7	36.7	22.9	54.3	12.3	49	30.5	12.3	17.1	12.3	12.3
H17	Residential	40.1	48.7	48.7	28.4	28.4	40	40.9	5.7	32	23.5	5.2	1.3	5.2	5.4

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Site ref	Site type	Breckland SPA	Breydon Water RAMSAR	Breydon Water SPA	Broadland RAMSAR	Broadland SPA	Dersingham Bog RAMSAR	Great Yarmouth North Denes SPA	Greater Wash SPA	Haisborough, Hammond and Winterton SAC	Inner Dowsing, Race Bank and North Ridge SAC	N Norfolk Coast SPA	Norfolk Valley Fens SAC	North Norfolk Coast RAMSAR	North Norfolk Coast SAC
MUN03/A	Residential	56	32.9	32.9	11.3	11.3	62.7	19.3	0.2	14.2	39.1	22.4	4.8	22.4	22.4
W01/1	Residential	35.7	64	64	43.2	43.2	26.3	57.5	0.9	46.3	19.7	1	17.6	1	1
F10	Residential	24.2	56.6	56.6	35.8	35.8	23.7	53.7	14	49.4	32	13.9	17.4	13.9	13.9
SH18/1B	Residential	47.6	45.8	45.8	24.4	24.4	48.2	35.4	1.4	23.5	24.1	5.8	0.8	5.8	5.8
BLA01/B	Residential	41.6	55.8	55.8	35.5	35.5	36.3	47.6	0.3	35.7	17.1	0.3	8.4	0.3	0.3
LUD01/C	Residential	55.7	13.1	13.1	1.2	1.2	70.8	9.6	9.5	17.6	57.2	38.4	20.4	38.4	38.5
BRI01	Residential	34.4	46.9	46.9	26.2	26.2	37	41.4	10.8	36.3	28.2	10.8	4.7	10.8	10.8
C22/4	Mixed	50.6	39.7	39.7	18.1	18.1	54.1	28	1.5	17.9	29.9	12.7	5.4	12.7	12.8
NW01/B	Mixed	49.5	27.3	27.3	5.8	5.8	59.3	18.1	7.6	21.5	42	23.3	5.6	23.3	23.4
NW16	Mixed	51.2	29	29	7.4	7.4	60.1	18.3	5.4	19.3	40.9	22.6	4	22.6	22.7
NW62/A	Mixed	48.7	27.6	27.6	6.2	6.2	58.3	18.8	7	21	40.1	21.5	3.7	21.5	21.6
ST23/2	Mixed	56.8	19.5	19.5	1	1	69.2	8.1	4.9	15.6	51.9	33.7	15	33.7	33.8
TAT01	Employment	22.2	64.1	64.1	43.4	43.4	15.7	61.3	12.3	55.5	30.1	12.1	17.9	12.1	12.3

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European sites O – Z:

Site ref	Site type	Outer Thames Estuary SPA	Overstrand Cliffs SAC	Paston Great Barn SAC	River Wensum SAC	Roydon Common & Dersingham Bog SAC	Roydon Common RAMSAR	The Broads SAC	The Wash & North Norfolk Coast SAC	The Wash RAMSAR	The Wash SPA	Winterton- Horsey Dunes SAC
C16	Residential	39.4	0.3	10.8	25.4	55.6	55.9	18.7	13.7	53.7	53.7	27.9
ST19/B	Residential	18.2	20.3	10.5	22.8	67.7	67.7	1.4	33.8	70.9	70.9	7.7
F02	Residential	59.9	33.4	41	0.4	22.4	22.4	37.3	13.1	25.6	25.6	54.8
SH04	Residential	45.5	7	18.1	22.5	48.6	49.3	24.3	6.2	46.2	46.2	35.1
BRI02/C	Residential	47.9	19.5	26.7	8.7	36.4	36.4	26.1	10.8	37.4	37.4	41.2
ST04/A	Residential	18.8	19.5	9.9	22.3	66.9	66.9	1.5	32.9	70	70	8.5
H20	Residential	48.1	13.8	23.3	15	41.4	41.9	27.2	5.1	40	40	39.3
F03	Residential	60	33.2	40.9	0.7	22.5	22.5	37.3	12.7	25.6	25.6	54.8
C10/1	Residential	41.8	1.8	13.5	25.3	53.2	53.7	20.9	10.8	51	51	30.6
HV06/A	Residential	18.6	22.7	15.3	13.9	61.2	61.2	1.7	32.9	66.6	66.6	15.2
BLA04/A	Residential	56.1	20.1	30.8	14.6	36.5	38.1	35.3	0.6	33.1	33.1	47.2
HV01/C	Residential	18.9	22.5	15.2	13.5	60.7	60.7	1.7	32.6	66.2	66.2	15.4
F01/B	Residential	59.3	32.3	40	0.9	22.8	22.8	36.7	12.3	25.6	25.6	54
H17	Residential	49.2	15.4	24.8	13.9	40	40.5	28.4	5.7	38.6	38.6	40.7
MUN03/A	Residential	31.5	7.3	2.3	26.5	62.3	62.3	11.3	22.4	61.9	61.9	19.3
W01/1	Residential	65	31.1	41.4	12.6	26.3	29	43.2	0.9	22.1	22.1	57.3
F10	Residential	58.5	32.6	39.9	0	23	23	35.8	14	26.8	26.8	53.5
SH18/1B	Residential	45.6	7.3	18.4	22	48.2	48.9	24.4	5.8	45.8	45.8	35.3
BLA01/B	Residential	56.3	20.4	31	14.6	36.3	38	35.5	0.3	32.8	32.8	47.5
LUD01/C	Residential	12.3	26.3	17	20	68.4	68.4	1.2	38.5	73.6	73.6	9.1
BRI01	Residential	48	19.3	26.6	9	36.7	36.7	26.2	10.8	37.7	37.7	41.2
C22/4	Mixed	39	1.3	10.9	23.8	54.1	54.3	18.1	12.8	52.5	52.5	28
NW01/B	Mixed	27	11.9	6.5	18.6	58.1	58.1	5.8	23.4	60.4	60.4	17.9
NW16	Mixed	28.3	10.1	4.2	21	59.1	59.1	7.4	22.7	60.5	60.5	18.1
NW62/A	Mixed	27.3	10	6	18	57.2	57.2	6.2	21.6	59	59	18.5

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Site ref	Site type	Outer Thames Estuary SPA	Overstrand Cliffs SAC	Paston Great Barn SAC	River Wensum SAC	Roydon Common & Dersingham Bog SAC	Roydon Common RAMSAR	The Broads SAC	The Wash & North Norfolk Coast SAC	The Wash RAMSAR	The Wash SPA	Winterton- Horse Dunes SAC
ST23/2	Mixed	18	20.5	10.8	22.5	67.5	67.5	1	33.8	70.9	70.9	7.9
TAT01	Employment	66.1	38.9	47	2.2	15.7	16.3	43.4	12.3	18.7	18.7	61

Appendix 2: Zones of influence for European sites and numbers of dwellings within each

Table gives the approximate number of houses within relevant zones of influence, as set out in the GIRAMs. Cells give approximate number of houses for each allocation or are left blank if the allocation is outside the zone of influence. Penultimate row, gives the relevant distance applied for the zone, from the GIRAMS action plan (Liley *et al.* 2024).

Site_Ref	SiteDescri	TYPE	Breckland SPA	Broadland RAMSAR	Broadland SPA	Great Yarmouth North Denes SPA	N Norfolk Coast SPA	Norfolk Valley Fens SAC	North Norfolk Coast RAMSAR	North Norfolk Coast SAC	The Broads SAC	The Wash & North Norfolk Coast SAC	The Wash RAMSAR	The Wash SPA	Winterton-Horsey Dunes SAC
C16	Former Golf Practice Ground, Overstrand Road	Residential		150	150	150	150	150	150	150	150	150	150	150	150
ST19/B	Land Adjacent Ingham Road	Residential		150	150	150	150		150	150	150	150			150
F02	Land Adjacent to Petrol Filling Station, Wells Road	Residential	70				70		70	70		70	70	70	
SH04	Land Adjoining Seaview Crescent	Residential		45	45		45	45	45	45	45	45	45	45	
BRI02/C	Land at Astley Primary School, Briston	Residential		90	90		90	90	90	90	90	90	90	90	
ST04/A	Land at Brumstead Road & N. of Calthorpe Close	Residential		45	45	45	45	45	45	45	45	45			45
H20	Land at Heath Farm	Residential		180	180		180	180	180	180	180	180	180	180	
F03	Land at Junction of A148 and B1146	Residential	65				65		65	65		65	65	65	
C10/1	Land at Runton Road / Clifton Park	Residential		70	70	70	70	70	70	70	70	70	70	70	70
HV06/A	Land at Stalham Road	Residential		50	50	50	50	50	50	50	50	50			50
BLA04/A	Land East of Langham Road	Residential					30	30	30	30		30	30	30	

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Site_Ref	SiteDescri	TYPE	Breckland SPA	Broadland RAMSAR	Broadland SPA	Great Yarmouth North Denes SPA	N Norfolk Coast SPA	Norfolk Valley Fens SAC	North Norfolk Coast RAMSAR	North Norfolk Coast SAC	The Broads SAC	The Wash & North Norfolk Coast SAC	The Wash RAMSAR	The Wash SPA	Winterton-Horsey Dunes SAC
HV01/C	Land East of Tunstead Road	Residential		150	150	150	150	150	150	150	150	150			150
F01/B	Land North of Rudham Stile Lane	Residential	560				560		560	560		560	560	560	
H17	Land North of Valley Lane	Residential		27	27		27	27	27	27	27	27	27	27	
MUN03/A	Land off Cromer Road & Church Lane	Residential		45	45	45	45	45	45	45	45	45			45
W01/1	Land South of Ashburton Close	Residential					20		20	20		20	20	20	
F10	Land South of Barons Close	Residential	55				55		55	55		55	55	55	
SH18/1B	Land South of Butts Lane	Residential		48	48		48	48	48	48	48	48	48	48	
BLA01/B	Land s. of Morston Rd. & w. of Langham Rd	Residential					30	30	30	30		30	30	30	
LUD01/C	Land South Of School Road	Residential		60	60	60	60		60	60	60	60			60
BRI01	Land West of Astley Primary School	Residential		25	25		25	25	25	25	25	25	25	25	
C22/4		Mixed		500	500	500	500	500	500	500	500	500	500	500	500
NW01/B		Mixed		350	350	350	350	350	350	350	350	350			350
NW16		Mixed		330	330	330	330	330	330	330	330	330			330
NW62/A		Mixed		1800	1800	1800	1800	1800	1800	1800	1800	1800			1800
ST23/2		Mixed		80	80	80	80		80	80	80	80			80
	Zone distance applied (km)		26.3	29.7	29.7	31.8	40.6	14.7	40.6	40.6	29.7	58.4	58.4	58.4	31.8
	Total houses		750	4195	4195	3780	5025	3965	5025	5025	4195	5025	1965	1965	3780

