HORSFORD NEIGHBOURHOOD PLAN REVIEW

STRATEGIC ENVIRONMENTAL ASSESSMENT

SUBMISSION ADDENDUM

OCTOBER 2026

Prepared by ONH on behalf of Horsford Parish Council to accompany the submission of the Horsford Neighbourhood Plan Review to Broadland District Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

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1. INTRODUCTION

1.1 This Addendum has been prepared by ONH on behalf of Horsford Parish Council ("the Parish Council") to accompany the submission of the Horsford Neighbourhood Plan Review ("the Neighbourhood Plan") to Broadland District Council ("the District Council"). It supplements, and should be read alongside, the Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), Environmental Report prepared for the Parish Council by AECOM (February 2025) ("the Environmental Report").

1.2 The District Council's screening opinion of January 2023 concluded that the Neighbourhood Plan requires an SEA under the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended). The Environmental Report was published alongside the Pre-Submission Plan for consultation under Regulation 14 in October and November 2025. It assessed the draft Neighbourhood Plan as it stood in February 2025. Since then, the Neighbourhood Plan has been amended in response to the Regulation 14 consultation, the publication of the National Planning Policy Framework (NPPF) in August 2026, and new technical evidence prepared for the Policy SS2A allocation.

1.3 The purpose of this Addendum is to:

- record the comments made on the Environmental Report at the Regulation 14 stage, and how they have been taken into account (Section 2);
- screen each change made to the Neighbourhood Plan since the Environmental Report was prepared, to establish whether it would give rise to likely significant environmental effects that have not already been assessed (Section 3);
- review the conclusions of the Environmental Report in the light of the new technical evidence (Section 4); and
- correct a number of errors in the Environmental Report (Appendix A).

1.4 This Addendum does not repeat the baseline, scoping or methodology of the Environmental Report, which remain valid. It uses the same SA framework and topics.

2. REGULATION 14 CONSULTATION

2.1 The comments made at the Regulation 14 stage that are relevant to the Environmental Report are summarised in Table 1, with the response made.

Table 1: Regulation 14 comments relevant to the SEA

Consultee	Summary of comment	Response
Natural England (7 November 2025)	No comments on the conclusions of the Environmental Report. Advises on proportionate on-site green infrastructure, the protection of best and most versatile agricultural land, and biodiversity net gain. Welcomes Policy SS2B, including the 'Off the Lead' area.	Noted. Policy SS2A requires a green infrastructure strategy, the eastern section of the Green Circular Path, access to Diamond Jubilee Plantation, and community gardens and allotments. Agricultural land quality will be addressed at the application stage.

Consultee	Summary of comment	Response
Historic England (9 December 2025)	Given the scale of the allocation, recommends a Heritage Impact Assessment (HIA) to inform the allocation and policy wording, with particular regard to the Grade II* Church of All Saints, nearby Grade II listed buildings and Horsford Castle.	An Initial Heritage Assessment (Bidwells, March 2026) and an Archaeological Appraisal (Tetra Tech RPS, April 2026) have been prepared and are published in the evidence base. Their findings are considered in Section 4.
Environment Agency (27 November 2025)	The Plan area includes the catchment of Whitlingham Water Recycling Centre, which is operating in exceedance of its permitted discharge volume. Advises engagement with Anglian Water, consideration of phasing, water efficiency and the sequential approach to flood risk.	GNLP Policies 2 and 4 already address water efficiency and wastewater infrastructure, and both allocation sites lie in Flood Zone 1. The Environment Agency considers the risk of significant harm to the receiving waterbody to be low. See Section 4.
Norfolk Wildlife Trust (13 November 2025)	Seeks clarification of the Forest School and Woodyard proposals and recommends an alternative to the 'Off the Lead' area, as all three Policy SS2B sites include or adjoin deciduous woodland priority habitat. Recommends stronger wording on County Wildlife Sites, priority habitats and lighting.	Considered in the screening of Policy SS2B in Section 3. GNLP Policy 3 requires development to avoid harm to designated and non-designated natural assets and to undertake ecological assessment where impacts may arise.
Norfolk County Council (27 November 2025)	Notes Areas that Could Become of Importance to Biodiversity in the Local Nature Recovery Strategy adjacent to the allocation. Lead Local Flood Authority seeks consideration of flood risk from all sources. Minerals Planning Authority notes both sites lie in a Mineral Safeguarding Area. Highway Authority objects to the Sports Hub site unless active travel provision is secured.	Flood risk and drainage technical notes have been prepared for both sites. The Norfolk Minerals and Waste Local Plan will apply. Policy SS2A now requires a shared footway/cycleway and Holt Road crossing to link the Sports Hub to the village. See Sections 3 and 4.
Broadland District Council	Asks whether broad technical assessment of the Sports Hub site has been undertaken (access, topography, flooding, archaeology), whether Norwich Airport has been consulted, and how the Sports Hub relates to the Local Green Gap in Policy ENV4. Recommends reference to the Norfolk Local Nature Recovery Strategy.	Technical notes on transport, flood risk and drainage, utilities, ecology, heritage and archaeology for the Sports Hub land are now published. See Sections 3 and 4.

3. SCREENING OF CHANGES TO THE PLAN

3.1 Table 2 summarises the changes made to the Neighbourhood Plan since the Environmental Report was prepared and screens each one. The test applied is whether the change would give rise to likely significant environmental effects that have not already been assessed, or would alter the conclusions of the Environmental Report.

Table 2: SEA screening of changes to the Neighbourhood Plan

Policy	Change since the Environmental Report	SEA screening
Plan period	Extended from 2038 to 2045.	No change to the scale or location of development assessed. No new effects.

Policy	Change since the Environmental Report	SEA screening
SS1	Reworded to refer to national decision-making policy and to GNLP Policy 7.5 on self-build and custom build. Settlement boundary drawn to include the Policy SS2A residential area.	Boundary reflects the allocation already assessed. No new effects.
SS2A – allocation	Former Policy SS2 split. Allocation areas now defined: 25 ha east of the village centre (about 300 homes and a community hub) and 11 ha south of Holt Road (Sports Hub). The Environmental Report appraised a smaller Sports Hub site of about 6 ha at the options stage.	Same location and quantum of housing. The larger Sports Hub area remains predominantly open sport and recreation use, with structural landscaping now required. Minor negative effects on land and landscape unchanged. No new significant effects.
SS2A – community hub	Now a mixed-use venue in the converted barn, retained by the landowner, including community space for hire.	Minor positive effects on community wellbeing remain. Reuse of the barn is neutral to beneficial for the historic environment.
SS2A – Sports Hub delivery	Land to be transferred freehold or on a lease of at least 100 years. Developer to provide, or fund, vehicular access, a shared footway/cycleway to the Brewery Lane roundabout with a Holt Road crossing, utility connections including foul drainage, and structural landscaping including a planted buffer to the A1270. Further drainage and ground conditions information required.	Strengthens positive effects on community wellbeing and transport, and responds to the Highway Authority's objection. Structural landscaping benefits landscape. Foul drainage options include a package treatment plant discharging to ground in Source Protection Zone III, which would be subject to Environment Agency permitting. No new significant effects.
SS2A – Habitats sites clause	The requirement to address visitor pressure on the Broadland SPA and Ramsar and to offset nutrient impacts "in accordance with Policy 3 of the Greater Norwich Local Plan" is no longer repeated in the policy, as GNLP Policy 3 applies directly.	No change in effects: the same requirements apply through the development plan.
SS2B	New separate policy supporting a Forest School at Diamond Jubilee Plantation, The Woodyard community space and an 'Off the Lead' dog walking area of about 2 ha. These sites formed part of the option appraised in the Environmental Report (Section 6), which noted potential recreational disturbance to priority woodland and heathland.	Minor positive effects on community wellbeing. Potential minor negative effects on priority woodland habitat at a site level, to be avoided or mitigated through GNLP Policy 3 and Policy ENV1. The 'Off the Lead' area provides alternative greenspace of the kind Natural England recommends. Not significant.
COM3, TRA2, INF2	Allotments, public parking and digital infrastructure policies deleted. Allotments are now required by Policy SS2A and existing allotments are listed in Policy COM1.	Neutral. Matters covered by other policies.
BUS1	Retitled 'New and Existing Business'. Identifies a need for a new or expanded supermarket or convenience store and maps existing business premises.	Minor positive effects on the economy and on transport by reducing journeys out of the village. Location and scale controlled by national policy. No new significant effects.
ENV1	Simplified to designate the Horsford Green Infrastructure Network for the application of national policy. Supporting text lists County Wildlife Sites and priority habitats.	Minor positive effects on biodiversity maintained.

Policy	Change since the Environmental Report	SEA screening
ENV4	Reframed to define land north of the A1270 as a Local Green Gap to maintain separation from Norwich.	Positive effects on landscape maintained. Outdoor sport and recreation is compatible with the open character of the Gap. Any buildings or floodlighting on the Sports Hub land will be assessed at the application stage.
HBE4	Amended to support Passivhaus or equivalent buildings using forms that differ from the local character area, where no significant harm results.	Minor positive effects on climate change maintained.
Other policies	COM1, COM2, HBE1–HBE3, TRA1, ENV2, ENV3, ENV5 and INF1 reworded to align with the NPPF (August 2026), with minor updates to mapping.	Neutral. No new effects.

3.2 None of the changes would give rise to likely significant environmental effects that have not already been assessed. Most are clarifications or are neutral in effect. Several strengthen the positive effects of the Plan, in particular the requirements for the delivery of the Sports Hub and its active travel connection to the village.

4. REVIEW OF THE ENVIRONMENTAL REPORT

4.1 Technical evidence on the Policy SS2A allocation has been prepared since the Environmental Report, largely on behalf of the land promoter. It is published in the evidence base and comprises ecology, flood risk and drainage, utilities, highways and transport technical notes, an Initial Heritage Assessment and an Archaeological Appraisal. Table 3 considers whether this evidence changes the findings of the Environmental Report for each SA topic.

Table 3: Review of the Environmental Report findings

SA topic	Environmental Report	New evidence	Updated position
Biodiversity and geodiversity	Minor positive	Land east of Holt Road is mainly arable and improved grassland of limited value, with species-rich hedgerows, possible veteran trees and a bat assemblage of regional importance, including barbastelle. A barn is a confirmed bat roost. The Sports Hub land is a single arable field with a likely bat commuting route along its western hedgerow. Recommendations include retaining veteran trees and hedgerows, dark buffers and further surveys (Applied Ecology, December 2025 and April 2026).	Minor positive maintained. Effects can be avoided and mitigated through the green infrastructure strategy required by Policy SS2A, Policies ENV1 and ENV5, GNLP Policy 3 and statutory biodiversity net gain.

SA topic	Environmental Report	New evidence	Updated position
Historic environment	Minor positive	No designated heritage assets on either site. At most, a low level of less than substantial harm to the setting of the Grade II* Church of All Saints and negligible to low harm to Horsford Hall. No harm to Horsford Castle Scheduled Monument. Low potential for significant archaeology (Bidwells, March 2026; Tetra Tech RPS, April 2026).	The Plan's heritage policies (HBE2, HBE3) and the Policy SS2A requirement to sustain the setting and significance of heritage assets remain positive. At the allocation, the effect is a minor negative one that can be mitigated through layout, landscaping and lighting. Overall effect for the Plan is neutral to minor positive. Not significant.
Landscape	Minor negative	Heritage assessment recommends lower density and height on the east and south edges and a green ring. Policy SS2A now requires structural landscaping, including a planted buffer to the A1270.	Minor negative maintained, due to the loss of greenfield land.
Land, soil and water resources	Minor negative	Both sites lie in Flood Zone 1 and Groundwater Source Protection Zone III, with ground suited to infiltration drainage. A foul sewer runs along the western edge of the land east of Holt Road. The Sports Hub land has no nearby public sewer. Both sites are in a Mineral Safeguarding Area for sand and gravel. The Environment Agency considers the risk to the receiving waterbody from growth in the Whitlingham catchment to be low.	Minor negative maintained. Groundwater, foul drainage, water efficiency and mineral safeguarding are addressed by GNLP Policies 2, 3 and 4, the Norfolk Minerals and Waste Local Plan and Environment Agency permitting.
Climate change	Neutral	Both sites are at very low risk of flooding from all sources. Rainwater and greywater harvesting recommended for the Sports Hub pavilion.	Neutral maintained.
Transportation	Minor positive	Residential access agreed in principle. The Holt Road/Brewery Lane roundabout operates within capacity in 2035. The Reepham Road/Drayton Lane roundabout is over capacity in 2035 without the development, which adds a small increase. A shared footway/cycleway and Holt Road crossing will link the Sports Hub to the village (Paul Basham Associates, 2026).	Minor positive maintained, strengthened by the Sports Hub active travel link. Capacity mitigation to be confirmed through the Transport Assessment.
Air quality	Neutral	No new evidence of air quality constraints.	Neutral maintained.
Community wellbeing	Significant positive	Sports Hub land secured on a long-term basis, with supporting infrastructure in place before homes are occupied.	Significant positive maintained and strengthened.

4.2 The new evidence confirms the findings of the Environmental Report. It identifies no likely significant negative effects, and the Plan continues to perform well overall. Its strongest benefits remain for community wellbeing, with minor negative effects on land and landscape arising from the loss of greenfield land.

4.3 Some matters are not covered by the technical evidence and will be addressed at the planning application stage: agricultural land classification, landscape and visual impact, and confirmation of the water recycling centre that will receive foul flows from the residential scheme. This does not affect the conclusions of the Environmental Report, which already identifies minor negative effects on land and landscape, and the relevant requirements are set out in the adopted development plan.

5. CONCLUSIONS

5.1 This Addendum has screened the changes made to the Neighbourhood Plan since the Environmental Report was prepared, and reviewed the Environmental Report in the light of the Regulation 14 consultation and the new technical evidence. It concludes that:

- none of the changes would give rise to likely significant environmental effects that have not already been assessed;
- the conclusions of the Environmental Report remain valid; and
- the Plan continues to avoid likely significant negative environmental effects, so no further recommendations are made.

5.2 Monitoring of the effects of the Plan will be undertaken through the District Council's Annual Monitoring Report, as set out in the Environmental Report.

APPENDIX A: CORRECTIONS TO THE ENVIRONMENTAL REPORT

A.1 The following corrections should be read into the Environmental Report. None affects its conclusions.

Reference	Error	Correction
Version and status	Version 3 is labelled the "Submission version" but its text refers to accompanying the Regulation 14 consultation.	Version 3 was published for the Regulation 14 consultation in October and November 2025. This Addendum accompanies it at submission.
Plan version assessed	Refers to the draft Plan and Policy SS2 as at February 2025, with a plan period to 2038.	The submitted Plan runs to 2045, and Policy SS2 is now Policies SS2A and SS2B (see Section 3).