



Mr Daniel Austen-Fainman
Brettingham House
98 Pottergate
Norwich
NR2 1EQ

Dear Mr Austen-Fainman,

Request for Screening Opinion under Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the redevelopment of Browston Hall and eastern part of site to provide new leisure and hospitality facilities - indoor entertainment facility offering ten pin bowling, golf simulators, pool and snooker tables, cafe and extension for storage and toilets, reception area and offices; spa and treatment facility; laundry and site storage; 50 luxury lodges with planting, roadways and parking. Ref: EIA/TH/2022/2

Thank you for requesting that Great Yarmouth Borough Council adopt a screening opinion for the above proposal as per Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. This response has been made at officer level under delegated powers and has been determined that an Environmental Impact Assessment is not required.

In formulating this screening opinion, I have reviewed the matters related to Schedule 3 of the EIA Regulations, drawing attention to the documents submitted under planning application ref 06/22/0110/F, as well as screening opinion consultation responses received by the Council by relevant stakeholders (Appendix 2 to this letter). This justification is provided in full within Appendix 1 to this letter.

Whilst the focus of this EIA screening Opinion is on the eastern part of the site (06/22/0110/F), the Council have assessed the potential cumulative impacts of both the eastern and southern parts (06/22/0111/F) of the site, to determine whether any significant effects are likely

The proposal is not considered to give rise to significant effects which would warrant further consideration through an Environmental Statement. I am satisfied that any likely effects currently identified could be appropriately mitigated through the planning application process.

Yours Sincerely,

Kim Balls MRTPI
Senior Strategic Planner
localplan@great-yarmouth.gov.uk

Appendix 1 – The Town and County Planning (Environmental Impact Assessment) Regulations 2017 - Screening Matrix

1. Case details

LPA Reference: EIA/TH/2022/2

Applicant: Browston Hall Gold and Leisure Ltd C/O Lanpro Services

Brief description of the project / development

The redevelopment of Browston Hall and eastern part of site to provide new leisure and hospitality facilities

2. EIA Details

Question	Answer
Is the project Schedule 1 development according to Schedule 1 of the EIA Regulations?	No
Is the project Schedule 2 development under the EIA Regulations?	Yes
If YES, under which description of development in Column 1 and Column 2?	Schedule 12(c) Holiday villages and hotel complexes outside urban areas and associated developments.
Is the development within, partly within, or near a 'sensitive area' as defined by Regulation 2 of the EIA Regulations?	Yes
If YES, which area?	The site is located approximately: 3.7km north-west of: Breydon Water SPA and Ramsar Broadland SPA and Ramsar 5.7km north-west of: The Broads SAC 7.9km north-east of: Great Yarmouth North Denes SPA
Are the applicable thresholds/criteria in Column 2 exceeded/met?	Yes
If yes, which applicable threshold/criteria?	The area of the development exceeds 0.5 hectares

3. Environmental Statement

Question	Answer
Has the applicant supplied an ES for the current or previous (if reserved matters or conditions) application?	No

1. Natural Resources

Question	Yes/No/ Not Known/ N/A	(Part 2a)/(Part 2b) – Answer to the question and explanation of reasons	Yes/No/ Not Known/ N/A	(Part 3a)/(Part 3b) (only if yes in part 2a) – Is a significant effect likely> (Yes/No or Not Known)
1.1 Will construction, operation or decommissioning of the project involve actions which will cause physical changes in the topography of the area?	Yes	The development will involve extensive landscaping and the introduction of a built form and hard surfaces within an area currently absent of these.	No	The site is not within a designated landscape and proposed mitigation in the form of landscaping should provide mitigation for significant effects.
1.2 Will construction or operation of the project use natural resources above or below ground such as land, soil, water, materials/minerals or energy which are non-renewable or in short supply?	Yes	Construction materials are likely to include materials which are non-renewable. The development is not on agricultural land but is within an area of high-grade agricultural land.	No	There will not be a significant or abnormal use of non-renewable materials and the land whilst in an area of high-grade agricultural land has not been in agricultural use.
1.3 Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, e.g. forestry, agriculture, water/coastal, fisheries, minerals?	Yes	<p>The development is not on agricultural land but is within an area of high-grade agricultural land.</p> <p>The site is to the north of Lound Lakes (a protected drinking water area) and water treatment works.</p> <p>The site is underlain by safeguarded sand and gravel resources.</p>	No	<p>The land itself is not agricultural land and the development is unlikely to impact upon adjacent soils. Surface water is proposed to be dealt with via infiltration and soakaways, and foul water will be dealt with via a treatment plant and subsequent percolation. It will be necessary to ensure the treatment plant solution meets acceptable environmental standards. Therefore, the risk to nearby water resources is considered low.</p> <p>Whilst the site is underlain by safeguarded sand and gravel resources, the nature of the development, comprising holiday lodges and a spa facility on the footprint of the existing Golf driving range, means that development is</p>

				unlikely to sterilise the possibility for future extraction if there is a need.
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2. Waste

Question	Yes/No/ Not Known/ N/A	(Part 2a)/(Part 2b) – Answer to the question and explanation of reasons	Yes/No/ Not Known/ N/A	(Part 3a)/(Part 3b) (only if yes in part 2a) – Is a significant effect likely> (Yes/No or Not Known)
2.1 Will the project produce solid wastes during construction or operation or decommissioning?	Yes	There is potential for waste through the construction and operation stage.	No	Effects are not considered to be significant or abnormal during construction or operational phases. Construction waste should be reused and recycled where possible. This should be included within a Site Waste Management Plan (SWMP) to accompany the planning application for the proposal. Commercial waste would be disposed of in line with GYBC requirements and managed in accordance with all applicable legislation.

3. Pollution and Nuisances

Question	Yes/No/ Not Known/ N/A	(Part 2a)/(Part 2b) – Answer to the question and explanation of reasons	Yes/No/ Not Known/ N/A	(Part 3a)/(Part 3b) (only if yes in part 2a) – Is a significant effect likely> (Yes/No or Not Known)
3.1 Will the project release pollutants or any hazardous, toxic or noxious substances to air?	Yes	Air quality effects are likely to arise from the dust and traffic emissions associated with the construction and operational phase.	No	The site is not within or in close proximity to an Air Quality Management Area, and the proposal will not result in uses which are generally pollutant generators.

				Any increase in the dust arising from the construction stage of development can be suitably mitigated through the provision of a construction management plan.
3.2 Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	Yes	Potential for noise generation during the construction phase. As part of the current use is a golf driving range, the operational phase is likely to produce an increase in noise levels.	No	<p>Potential sensitive noise receptors are located approximately 40m from the site. Construction and operational noise generation is likely to be mitigated by the existing landscaping around the site. The new leisure and tourism facilities are unlikely to give rise to noise levels significantly above that generated from the existing uses.</p> <p>Noise generation associated with the construction phase will be temporary and can be controlled by a construction management plan.</p>
3.3 Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	Yes	The site and surrounding area has previously been used for agricultural and leisure uses and there is potential for drainage and run-off to contaminate nearby water courses (Lound Lakes - a protected drinking water area) which provides a drinking water source.	No	<p>A Phase 1 contaminated land assessment has been undertaken, concluding that no potential contamination sources were observed to be leaching into the ground on either the eastern or southern parts of the site and that there were no concerns in relation to contamination that would arise were the proposal to be delivered.</p> <p>Any potential removal and disposal off-site of contaminated soils underlying the existing concrete surface would need to be monitored and managed</p> <p>A site-specific Flood Risk Assessment (FRA) has been undertaken to accompany the planning application, which concludes that surface water will be dealt with via infiltration and soakaways, and foul water will be dealt with via a treatment plant and subsequent percolation. Therefore the risk to water resources is considered to be</p>

				low. It will be necessary to ensure the treatment plant solution meets acceptable environmental standards.
3.4 Are there any areas on or around the location which are already subject to pollution or environmental damage, e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	Yes	Lound Mill Water (Lound Lakes), a protected drinking water area, to the south of the site is currently rated 'poor' in terms of water quality. It has an objective to become 'Good' by 2027	No	As above

4. Population and Human Health

Question	Yes/No/ Not Known/ N/A	(Part 2a)/(Part 2b) – Answer to the question and explanation of reasons	Yes/No/ Not Known/ N/A	(Part 3a)/(Part 3b) (only if yes in part 2a) – Is a significant effect likely> (Yes/No or Not Known)
4.1 Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?	Yes	There is a risk of accidents (non-major) from the construction stage.	No	Any effects can be mitigated through normal construction practices.
4.2 Will the project present a risk to the population (having regard to population density) and their human health during construction, operation or decommissioning? (for example due to water contamination or air pollution)	No	Lound Lakes to the south of the site is a protected drinking water area. However, risks are considered minimal to this as described above.	No	

5. Water Resources

Question	Yes/No/ Not Known/ N/A	(Part 2a)/(Part 2b) – Answer to the question and explanation of reasons	Yes/No/ Not Known/ N/A	(Part 3a)/(Part 3b) (only if yes in part 2a) – Is a significant effect likely> (Yes/No or Not Known)
5.1 Are there any water resources including surface waters, e.g. rivers, lakes/ponds, coastal or underground waters on or around the location which could be affected by the project, particularly in terms of their volume and flood risk?	Yes	Lound Mill Water (Lound Lakes) a protected drinking water area to the south of the site (also known as Lound Lakes) is currently rated 'Poor' in terms of water quality. It has an objective to become 'Good' by 2027	No	As described above.

6. Biodiversity (Species and Habitats)

Question	Yes/No/ Not Known/ N/A	(Part 2a)/(Part 2b) – Answer to the question and explanation of reasons	Yes/No/ Not Known/ N/A	(Part 3a)/(Part 3b) (only if yes in part 2a) – Is a significant effect likely> (Yes/No or Not Known)
6.1 Are there any protected areas which are designated or	Yes	The site is within 0.5km of Lound Lakes County Wildlife Site (CWS). Belton Common	No	The site itself is indicated to have limited ecological value by the Preliminary Ecological Assessment (PEA) that has

<p>classified for their terrestrial, avian and marine ecological value, or any non-designated / non-classified areas which are important or sensitive for reasons of their terrestrial, avian and marine ecological value, located on or around the location and which could be affected by the project? (e.g. wetlands, watercourses or other water-bodies, the coastal zone, mountains, forests or woodlands, undesignated nature reserves or parks. (Where designated indicate level of designation (international, national, regional or local)).</p>		<p>CWS is approximately 2.2km from the site. Howards Common, Belton Common North and Wild Duck Caravan Park CWS are approximately 2.5 km from the site. Waveney Forest CWS is approximately 3.3 km for the site and Fritton Warren CWS is approximately 3.8km from the site.</p> <p>The site is located approximately 3.7km north-west of Breydon Water SPA and Ramsar and Broadland SPA and Ramsar, 5.7km north-west of The Broads SAC and 7.9km north-east of Great Yarmouth North Denes SPA. The Southern North Sea SAC and the Outer Thame Estuary SPA are approximately 3.1km to the east.</p> <p>The site falls within 2.5-5km zone as identified in the Great Yarmouth Habitat Monitoring and Mitigation Strategy (2019). Developments comprising new holiday accommodation within this zone are likely to have an in-combination significant effect on European Designated sites. Development comprising 61 - 230 bed spaces require a bespoke habitat regulations assessment to test the extent of development specific impacts.</p> <p>The site falls within the Site of Special Scientific Interest (SSSI) Impact Zones for Halvergate Marshes SSSI and Breydon Water SSSI</p>	<p>been submitted to accompany the subsequent planning application. The assessment highlights that cumulatively there would be minimal impact upon any protected sites. Whilst the PEA notes a likely small increase in recreational pressure on CWS and SSSI's, the presence of a proposed onsite recreation, walking routes, and financial contribution towards the Norfolk Green Infrastructure and Recreational Avoidance Mitigation Strategy (GIRAMS) is likely to mitigate this, such that any effects would not be significant.</p> <p>Norfolk County Council have advised that applicant also completes the Defra Metric V3.0 and seeks to achieve a measurable minimum 10% Biodiversity net gain.</p> <p>At the time of conducting this EIA Screening opinion, Natural England had not responded to the consultation. However, a PEA and HRA have been undertaken and the views of the Norfolk County Council Ecologist have been considered. Natural England did not consider significant effects likely on the previous EIA screening opinion (southern part of the site). Given the above, it is not considered that significant effects are likely. Any subsequent information received from Natural England will be forwarded to the applicant and will need to be considered in any subsequent application.</p>
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6.2 Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, e.g. for breeding, nesting, foraging, resting, over-wintering, or migration, be affected by the project?	No	The PEA that accompanies the planning application concludes that the site is of limited ecological value.	No	

7. Landscape and Visual

Question	Yes/No/ Not Known/ N/A	(Part 2a)/(Part 2b) – Answer to the question and explanation of reasons	Yes/No/ Not Known/ N/A	(Part 3a)/(Part 3b) (only if yes in part 2a) – Is a significant effect likely> (Yes/No or Not Known)
7.1 Are there any areas or features on or around the location which are protected for their landscape and scenic value, and/or any non-designated / non-classified areas or features of high landscape or scenic value on or around the location which could be affected by the project? Where designated indicate level of designation (international, national, regional or local).	No	There are no landscape designations within or around the location.	N/A	

<p>7.2 Is the project in a location where it is likely to be highly visible to many people? (If so, from where, what direction, and what distance?)</p>	<p>No</p>	<p>As the site is located in an area of low population density, there are few landscapes and visual receptors in the area. The site is well screened on its northern, western, and southern boundaries by trees and hedging, with agricultural land beyond. Whilst the site is visible from Browston Hall landscape mitigation is proposed.</p> <p>A Landscape and Visual Appraisal has been undertaken which concludes that landscape and visual effects resulting from the development would be limited to areas near the development at a localised level. The appraisal notes that the site has a tight visual envelope, and that cumulative development of the site (alongside the southern part of the site) would not result in a change in the overall surrounding landscape and visual composition.</p>	<p>N/A</p>	
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8. Cultural Heritage/Archaeology

Question	Yes/No/ Not Known/ N/A	(Part 2a)/(Part 2b) – Answer to the question and explanation of reasons	Yes/No/ Not Known/ N/A	(Part 3a)/(Part 3b) (only if yes in part 2a) – Is a significant effect likely? (Yes/No or Not Known)
<p>8.1 Are there any areas or features which are protected for their cultural heritage or archaeological value, or any non-designated / classified areas and/or features of cultural heritage or archaeological importance on or around the location which could be affected by the project (including potential impacts on setting, and views</p>	<p>Yes</p>	<p>The site forms part of the setting of the Grade II* listed Browston Hall Hotel. The planning application is accompanied by a Heritage Statement and an Archaeological desk-based assessment.</p>	<p>No</p>	<p>The Heritage Statement concludes that, cumulatively, the proposed development is only likely to have a minor adverse impact on sites of special architectural and historic interests, given the existing use of the site as a golf driving range.</p>

<p>to, from and within)? Where designated indicate level of designation (international, national, regional or local).</p>		<p>The Archaeological desk-based assessment concludes that there is moderate to high potential for below ground archaeological remains of prehistoric or post-medieval date, that may be of local or regional significance.</p>	<p>Norfolk County Council have concluded that whilst the is site is visible from Browston Hall, suitable landscaping can be utilised to minimise the visual impact on the setting of the listed building.</p> <p>Landscaping is particularly important in mitigating the impact and will need to be secured by planning condition on any planning permission. The precise design of the leisure and accommodation units will need to be given careful consideration to minimise impacts.</p> <p>As concluded by the archaeological desk-based assessment, further archaeological work is likely to be required post-determination and may be appropriately secured by planning condition, though any Archaeological issues are likely to be overcome without requiring an EIA.</p>
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9. Transport and Access

Question	Yes/No/ Not Known/ N/A	(Part 2a)/(Part 2b) – Answer to the question and explanation of reasons	Yes/No/ Not Known/ N/A	(Part 3a)/(Part 3b) (only if yes in part 2a) – Is a significant effect likely> (Yes/No or Not Known)
<p>9.1 Are there any routes on or around the location which are used by the public for access to recreation or other</p>	<p>No</p>	<p>There are no public rights of way which could be detrimentally impacted upon by the proposals.</p>	<p>N/A</p>	

facilities, which could be affected by the project?				
9.2 Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	Yes	The A143 Beccles Road is the principal transport corridor serving Great Yarmouth from the development and is particularly susceptible to peak am/pm congestion.	No	A transport statement accompanies the applications and assesses the cumulative impacts of both the southern and eastern development of the site. Overall, the transport statement concludes that the proposed development would result in a minor decrease and minor benefit to the local road network, which can be adequately accommodated by the existing access off Browston lane. The cumulative level of traffic generation during construction and operation is not considered sufficient to create a significant effect.

10. Land Use

Question	Yes/No/ Not Known/ N/A	(Part 2a)/(Part 2b) – Answer to the question and explanation of reasons	Yes/No/ Not Known/ N/A	(Part 3a)/(Part 3b) (only if yes in part 2a) – Is a significant effect likely> (Yes/No or Not Known)
10.1 Are there existing land uses or community facilities on or around the location which could be affected by the project? E.g. housing, densely populated areas, industry / commerce, farm/agricultural holdings, forestry, tourism, mining, quarrying, facilities relating to health, education,	Yes	The site is currently partly in use as a golf driving range (GDR). The site was formerly used as an indoor bowling green with hospitality facilities, though whilst the GDR reopened in 2020, the other facilities on site have remained closed. The proposed development would result in the loss of these facilities and replacement with new leisure and hospitality facilities, including a new spa building and holiday accommodation.	No	The existing leisure facilities are a privately-operated enterprise, and it is indicated that a number of facilities, including the GDR are underutilised. The Great Yarmouth Play and Leisure strategy indicates that there are other similar facilities across the wider catchment and that the development would not result in a need for additional golf provision. Other facilities on site, such as the existing restaurant, bar, events space, tennis courts and bowling green are proposed to be retained as part of the development.

places of worship, leisure /sports / recreation.		The site is adjacent to a number of residential uses where there is potential for disturbance particularly during the construction stage due to dust and noise.		Issues relating to dust and noise are discussed above.
10.2 Are there any plans for future land uses on or around the location which could be affected by the project?	No		N/A	

11. Land Stability and Climate

Question	Yes/No/ Not Known/ N/A	(Part 2a)/(Part 2b) – Answer to the question and explanation of reasons	Yes/No/ Not Known/ N/A	(Part 3a)/(Part 3b) (only if yes in part 2a) – Is a significant effect likely> (Yes/No or Not Known)
11.1 Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions, e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?	Yes	<p>A Flood risk and drainage assessment (FRA) has been submitted to accompany the planning application. The site is located within flood zone 1 and not considered by the FRA to be at significant risk of flooding from any source, though surface water flooding poses the biggest risk.</p> <p>The Lead Local Flood Authority (LLFA) outline that the site is affected by surface water flooding in the 3.33%, 1.0% and 0.1% AEP events as shown by the Environment Agency (EA) Risk of Flooding from Surface Water</p>	No	It is considered that surface water flood risks can be suitably addressed through the planning application process without the requirement for an EIA. There are no other extreme climatic conditions that would create a likely significant effect.

		(RoFSW) maps. A minor surface water flow path is present onsite near the northern boundary in the 0.1% AEP event, with areas of ponding coinciding with this flow path present in the 1.0% and 3.33% AEP events. The LLFA have outlined in full what information should be contained within an FRA.		
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12. Cumulative effects

Question	Yes/No/ Not Known/ N/A	(Part 2a)/(Part 2b) – Answer to the question and explanation of reasons	Yes/No/ Not Known/ N/A	(Part 3a)/(Part 3b) (only if yes in part 2a) – Is a significant effect likely> (Yes/No or Not Known)
12.1 Could this project together with existing and/or approved development result in cumulation of impacts together during the construction/operation phase?	Yes	This screening opinion has considered, where appropriate, the in-combination effects, were development of both the southern and eastern parts of the site to occur. This includes potential in-combination effects on designated habitat sites and impacts upon cumulative traffic generation.	No	Suitable mitigation for in-combination effects on designated habitat sites can be provided through contribution to the Norfolk GIRAMS. The transport assessment raised that, cumulatively, the proposal would result in a minor decrease in one-way journeys to and from the site during the operational phase.

13. Transboundary effects

Question	Yes/No/ Not Known/ N/A	(Part 2a)/(Part 2b) – Answer to the question and explanation of reasons	Yes/No/ Not Known/ N/A	(Part 3a)/(Part 3b) (only if yes in part 2a) – Is a significant effect likely> (Yes/No or Not Known)
13.1 Is the project likely to lead to transboundary effects?	No		N/A	

5. Conclusions

Subject to the mitigation proposed as discussed above, the proposal is unlikely to have significant effects on the environment. Therefore, an Environmental Statement is not required to accompany the planning application for the proposals as described.

6. Screening Decision

An Environmental Statement is not required.

7. Assessment (EIA Regs Schedule 2 development)

The Development is not likely to have significant effects on the environment and ES is not required.

Name: Kim Balls MRPTI – Senior Strategic Planner

Date: 16th February 2022

Consultee	Response
Norfolk County Council – Historic Environment	The Norfolk County Council Environment Service Historic Environment Strategy and Advice team does not consider that an EIA is required on historic environment grounds. However, conditioned archaeological mitigation may be necessary if planning permission is granted.
Norfolk County Council – Infrastructure	The proposal will need to consider any onsite / offsite infrastructure requirements arising as a consequence of the development. The applicant will need to have regard to the County Council’s most up to date Planning Obligations Standards (March 2020) https://www.norfolk.gov.uk/rubbish-recycling-and-planning/planning-applications/planning-obligations
Norfolk County Council – Transport Developer Services	<p>Based upon the information submitted, should an application progress, I can confirm that the Highway Authority would require a Transport Statement the detail of which should be fully scoped with the Highway Authority.</p> <p>It is outlined that the proposals look to develop an existing underutilised area of the site therefore it is key that the applicant outline a detailed traffic analysis of the existing / former use of the site and the proposed uses.</p> <p>As a minimum the information should include:</p> <ul style="list-style-type: none"> • The volume of traffic generated existing / proposed • An assessment of the site access and surrounding highway network to cater for the development with appropriate mitigation identified if required including any measures to improve/provide for non-motorised access to the site. • Confirmation that sufficient onsite parking and turning facilities can be achieved. • Duration of construction works. • Timing of construction works. • A CTMP (Construction Traffic Management Plan) will need to be agreed and implemented throughout the duration of the works. <p>If you have any questions or would like to discuss our recommendations please contact the Developer Services</p>
Norfolk County Council – Natural Environment	<p>Ecology:</p> <p>I am satisfied that the application site is not located within an area identified as environmentally sensitive in the EIA Regulations with no European, statutory or non-statutory protected ecological sites within 2km. The closest designated sites are Breydon Water SPA and Ramsar site (3.7km north west) and Broadland SPA and Ramsar site (3.7 km north-west). The Broads SAC is located 5.7km north-west and the Great Yarmouth North Denes SPA is located 7.9 km north-east.</p> <p>No direct impacts on these sites would be anticipated resulting from site preparation or construction, however impacts from increased recreational disturbance are likely.</p>

	<p>It will therefore be essential that this disturbance is adequately mitigated for via a financial contribution to the Great Yarmouth BC Habitats Monitoring and Mitigation Strategy/ Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS).</p> <p>I am pleased to note that a Preliminary Ecological Appraisal (PEA) and ‘Shadow’ HRA have been submitted in relation to the eastern part of the overall site, however, should the full proposal, including the southern area come forward together, it is recommended that both the PEA and HRA are revised to reflect this.</p> <p>It is also recommended that the applicant completes the Defra Metric V3.0 and seeks to achieve a measurable minimum 10% Biodiversity Net Gain.</p> <p>In this instance it is not considered that an EIA would necessarily be required from an ecological perspective.</p> <p>Landscape:</p> <p>I am satisfied that the application site is not within a designated landscape and that the proposed landscape mitigation should prevent wider significant effects. There are no landscape designations in the surrounding site and the site is well contained and screened from any residential areas. The site will be visible from Browston Hall, however landscaping can be utilised to minimise the visual impact on the setting of this Grade II* listed building.</p> <p>I am pleased to note that a Landscape and Visual Impact Assessment has been submitted in relation to the eastern part of the overall site. Should the full proposal including the southern area come forward together a cumulative LVIA would be best to reflect the size and scale of the site.</p> <p>In this instance it is not considered that an EIA would necessarily be required from an landscape perspective.</p>
Norfolk County Council – Lead Local Flood Authority	<p>We note that Norfolk County Council has already adopted a formal EIA screening opinion (March 2020) that the development of the proposed southern part of the site would not give rise to likely significant effects in paragraph 2.5.1.</p> <p>We welcome the inclusion of Section 5.8 ‘Flood Risk, Drainage, and Foul Water’ and the EIA Screening Matrix in Appendix 1, with specific reference to section 5 ‘Water Resources’.</p> <p>The current review of flood risk is relatively basic however we welcome that the applicant states a Flood Risk and Drainage Strategy has been prepared for the application site. This document has not been submitted or formally reviewed as part of this screening. We welcome that infiltration is the proposed option for draining surface water runoff from the site.</p> <p>We note that the site is affected by surface water flooding in the 3.33%, 1.0% and 0.1% AEP events as shown by the Environment Agency (EA) Risk of Flooding from Surface Water (RoFSW) maps. A minor surface water flow path is present onsite near the northern boundary in the 0.1% AEP event, with areas of ponding coinciding with this flow path present in the 1.0% and 3.33% AEP events. We would expect this to be addressed as part of any future FRA and Drainage Strategy along with all other sources of flooding.</p>

According to Lead Local Flood Authority (LLFA) datasets (extending from 2011 to present day) we have 0 record of internal or external/anecdotal flooding within proximity of the site. The LLFA highlight the importance of considering surface water, groundwater, and flooding from ordinary watercourses in the best interest of development in the area.

In terms of flood risk, the applicant has stated that the site is “at limited risk of flooding”. We would advise that the benefits of a full EIA will only support the site development and far outweigh the loss of not doing so, but ultimately, we recognise that it is the responsibility of the LPA to decide whether a full EIA is required or not.

Whether or not an EIA is required we consider that the following issues should be considered and addressed:

- We strongly recommend that any EIA includes, or any planning application for development is accompanied by a FRA / surface water drainage strategy to address:
- All sources of flood risk, including those from ordinary watercourses, surface water and groundwater to the development.
- How surface water drainage from the development will be managed on-site and show compliance with the written Ministerial Statement HCWS 161 by ensuring that Sustainable Drainage Systems (SuDS) are put in place.
- How any phasing of the development will affect the overall drainage strategy and what arrangements, temporary or otherwise, will need to be in place at each stage of the development in order to ensure the satisfactory performance of the overall surface water drainage system for the entirety of the development.

This supporting information would assess the potential for the development to increase the risk of flooding from the proposal or how surface water runoff through the addition of hard surfaces will be managed. It will show how this will be managed to ensure that the development does not increase flood risk on the site or elsewhere, in line with National Planning Policy Framework (NPPF) (Paragraph 167).

In this particular case this would include appropriate information on:

- Appropriate assessment and mitigation of all sources of surface water flooding onsite/originating from offsite that may affect the development, in addition to risk of groundwater flooding.
- Sustainable Drainage Systems (SuDS) proposals in accordance with appropriate guidance including “Non-statutory technical standards for sustainable drainage systems” March 2015 by Department for Environment, Food and Rural Affairs.
- At least one feasible proposal for the disposal of surface water drainage should be demonstrated and in many cases supported by the inclusion of appropriate information. It is important that the SuDS principles and hierarchies have been followed in terms of:

	<ul style="list-style-type: none">➤ surface water disposal location, prioritised in the following order: disposal of water to shallow infiltration, to a watercourse, to a surface water sewer, combined sewer / deep infiltration (generally greater than 2m below ground level).➤ the SuDS components used within the management train (source, site and regional control) in relation to water quality and quantity.➤ identifying multifunctional benefits including amenity and biodiversity. <ul style="list-style-type: none">• The drainage strategy should also contain a maintenance and management plan detailing the activities required and details of who will adopt and maintain all the surface water drainage features for the lifetime of the development. <p>Please note, if there are any works proposed as part of this application that are likely to affect flows in an ordinary watercourse, then the applicant is likely to need the approval of the County Council. In line with good practice, the Council seeks to avoid culverting, and its consent for such works will not normally be granted except as a means of access. It should be noted that this approval is separate from planning.</p> <p>Further guidance for developers can be found on our website at https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-watermanagement/information-for-developers</p>
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