

Settlement Name:	Frettenham
Settlement Hierarchy:	<p>Frettenham is a cluster in the emerging Greater Norwich Local Plan. The Towards a Strategy document identifies that around 2,000 dwellings in total should be provided between all the village clusters. Services in Frettenham include a primary school and peak hour bus services.</p> <p>The current capacity of Frettenham Primary School is rated as green. The pupil intake is not up to the Published Annual Number (PAN) however the school is landlocked which could make further expansion difficult. Consequently, it is considered that Frettenham could accommodate development in the region of around 50-60 dwellings, depending on the quality of the sites proposed and the range of services and facilities in the village.</p> <p>At the base date of the plan there are no carried forward residential allocations but there is a total of 3 additional dwellings with planning permission on small sites.</p>

PART 1 - ASSESSMENTS OF SITES INCLUDED IN THE DRAFT LOCAL PLAN REGULATION 18C CONSULTATION (JANUARY – MARCH 2020)

STAGE 1 – COMPLETE LIST OF SITES PROMOTED IN THE SETTLEMENT

LIST OF SITES TO BE CONSIDERED FOR RESIDENTIAL/MIXED USE ALLOCATION (0.5 HECTARES OR LARGER)

Address	Site Reference	Area (ha)	Proposal
Frettenham			
Land south of Harbord Road	GNLP0492	6.37	Residential (unspecified number) and enabling large area of GI
Adjacent 10 Buxton Road	GNLP2078	1.42	25 dwellings
Total area of land		7.79	

LIST OF SITES TO BE CONSIDERED AS SETTLEMENT BOUNDARY EXTENSIONS (SETTLEMENT BOUNDARY PROPOSALS AND SITES LESS THAN 0.5 HECTARES)

Address	Site Reference	Area (ha)	Proposal
None			

(Sites of less than 0.5ha are not considered suitable for allocation and therefore have not been assessed in this booklet. These sites will be considered as part of a reappraisal of settlement boundaries to be published with the Regulation 19 Submission version of the Plan).

LIST OF SITES SUBMITTED FOR OTHER USES

Address	Site Reference	Area (ha)	Proposal
Frettenham			
Adjacent 10 Buxton Road	GNLP2076	0.39	Commercial development – 5 business units

(Sites submitted for other uses are considered in separate ‘Non-Residential’ Site Assessment booklets and therefore have not been assessed in this booklet).

STAGE 2 – HELAA COMPARISON TABLE

RESIDENTIAL/MIXED USE

	Categories													
	Site access	Access to services	Utilities Capacity	Utilities Infrastructure	Contamination/ ground stability	Flood Risk	Market attractiveness	Significant landscapes	Sensitive townscapes	Biodiversity & Geodiversity	Historic environment	Open Space and GI	Transport & Roads	Compatibility with neighbouring uses
Site Reference	Frettenham													
GNLP0492	Green	Amber	Amber	Green	Amber	Amber	Amber	Green	Red	Red	Green	Green	Amber	Amber
GNLP2078	Amber	Amber	Amber	Green	Amber	Green	Amber	Green	Green	Amber	Green	Green	Amber	Amber

STAGE 3 – SUMMARY OF COMMENTS FROM THE REGULATION 18 STAGE A & B CONSULTATIONS

Site Reference	Comments
Frettenham	
GNLP0492	<p>General comments Objections raised regarding poor access, five road junction that highways turned down as a health and safety issue. It was also turned down by the planning inspectors as it was not suitable for housing. Lack of adequate services and facilities in Frettenham means this site is neither needed nor suitable for any future housing development. This land is supposed to be a nature reserve, it has already been abused by unknown persons cutting trees, filling ponds etc.at weekends and evenings; a few years ago when they proposed 300+ houses a roundabout, street lights GP surgery etc</p> <p>Norfolk Wildlife Trust comments Pleased to see the impact on County Wildlife Site is recognised as a major constraint and the need for area with CWS to be recognised as GI, if there is any smaller development outside of CWS.</p> <p>Norfolk Geodiversity Partnership We conditionally object to this proposal. This site includes a chalk pit of geological interest, listed in the Norfolk Geodiversity Audit as site BRL15. It provides degraded exposures of the Cretaceous Campanian Chalk of the Beeston Chalk sub-division. The site has a history of research (Peake 1960, Pitchford 1990, Whittlesea 2007) and is a former geological SSSI and also a CWS. If development were granted we strongly request that plans be made conditional upon providing geological exposures of chalk to make a nature conservation area for Green Infrastructure, thus conserving the site's geological as well as wildlife interest.</p>
GNLP2078	<p>General comments Comments submitted in support of site as it has 'excellent' access and good visibility in both direction from proposed entrance. It will also compliment the units already in situ. GNLP2078 and GNLP2076 would add to the village as opposed to GNLP0492 which with the poor access onto Post Office Road and five-road junction has already drawn criticism from Highways stating that the layout would need to be changed before any development could be considered.</p> <p>Refer to consultation website to find an indicative layout masterplan incorporating site submissions 2078 and 2076.</p>

STAGE 4 – DISCUSSION OF SUBMITTED SITES

In this section sites are assessed in order to establish whether they are suitable for allocation. For the purposes of Sustainability Appraisal, suitable sites are those which are considered to be Reasonable Alternatives. Sites not considered suitable for allocation are not realistic options and therefore are not considered to be reasonable alternatives. The discussion below outlines the reasons why a site has been deemed suitable or unsuitable for allocation. By association this is also the outline of the reasons why a site was deemed to be a reasonable or unreasonable alternative.

A range of factors have been taken into account to establish whether a site should, or should not, be considered suitable for allocation. These factors include: impact on heritage and landscape; impact on the form and character of the settlement; relationship to services and facilities; environmental concerns, including flood risk; and, in particular, a safe walking route to a primary school. Sites which do not have a safe walking route to school, or where a safe walking route cannot be created will not be considered suitable for allocation.

Conclusions in regard to a sites performance against the relevant factors have also been informed by the outcomes of the HELAA, as set out under stage 2, consultation responses received, as summarised in stage 3, and other relevant evidence

GNLP0492

Site is proposed for residential – number of dwellings not specified.

The site is around 650m to the school from the site entrance and there is a footway for the entire journey, albeit on one side of the road(s).

Comments have been received relating to concerns about the highway access, although Norfolk County Council as part of their high-level comments on the site imply that any junction issues could be addressed as a result of development.

Some comments suggest that there is a lack of services in the area. The HELAA rates accessibility to services as amber and that is because there is a primary school (that has capacity) and bus services (with peak hour and weekend services to North Walsham/Norwich) within walking distance from the site. Although not services considered by the HELAA methodology, there is a pub and village hall around 800m from the site, but there is not a continuous footway from the site to these facilities.

Whilst the entire site is put forward for consideration, including the County Wildlife Site and trees, the site has been put forward for some dwellings and some open space/green infrastructure so the proposer does not seem to promote the entire site for development. It seems the HELAA assessment has assessed the entire site.

If only the field part of the site is considered for housing then it could be that the HELAA is slightly different in terms of the assessment against townscape and biodiversity and geodiversity. Whilst the County Wildlife Site and trees are adjacent to the site, the rating would be amber as any impacts could be mitigated as part of

policy/planning condition requirements. The field itself is classed as Grade 3 in the Agricultural Land Classification. The area of the field is around 1 Hectare and a similar density of housing to reflect the local character could be applied to this site so as a rough estimate it seems the site could deliver around 15 dwellings.

In conclusion it seems reasonable to shortlist the area that is field, excluding the County Wildlife Site and trees, as a reasonable alternative for further consideration.

GNLP2078

Site is proposed for residential - 25 dwellings.

The site is around 1,200m from the school. There is a footway from near the site along Buxton Road to the junction with Pound Hill, although a short stretch of footway may be needed in the verge from the actual site entrance. From Pound Hill to Post Office Road there is no footway (for around 360m) and it seems that the provision of a footway might be difficult as the road is narrow and so too is the verge. The footway starts again at the Post Office Road/Pound Hill junction.

According to the Highway Authority, initial evidence shows the site to be remote, with concerns over access and the capacity of the local road network.

The HELAA rates accessibility to services as amber and that is because there is a primary school (that has capacity) and bus services (with peak hour and weekend services to North Walsham/Norwich) within walking distance from the site. Although not services considered by the HELAA methodology, there is a pub and village hall around 900m from the site, but there is not a continuous footway from the site to these facilities.

Part of the site is a historic landfill site that would need remediating.

Given the lack of footways to the school, this site is not shortlisted as a reasonable alternative for further consideration.

STAGE 5 – SHORTLIST OF REASONABLE ALTERNATIVE SITES FOR FURTHER ASSESSMENT

Based on the assessment undertaken at stage 4 above the following sites are considered to be reasonable alternatives.

Address	Site Reference	Area (ha)	Proposal
Frettenham			
Land south of Harbord Road	GNLP0492	Promoter put forward 6.37 The field itself is 1ha in area.	The promoter suggested residential (unspecified number) and enabling large area of GI If the field is assessed on its own, then to reflect the character of the area, perhaps around 15 dwellings might be suitable.
Total area of land		6.37 (1ha developable)	

STAGE 6 – DETAILED SITE ASSESSMENTS OF REASONABLE ALTERNATIVE SITES

Site Reference:	GNLP0492
Address:	Land south of Harbord Road, Frettenham, NR12 7ND
Proposal:	Residential development for an undetermined number of dwellings enabling a large area of green infrastructure.

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Dormant B8 storage and distribution site, residential and woodland.	Part brownfield

CONSTRAINTS IDENTIFIED IN THE HELAA
<p>Amber Constraints in HELAA Accessibility to Services, Utilities Capacity, Contamination and Ground Stability, Flood Risk, Market Attractiveness, Transport & Roads and Compatibility with Neighbouring Uses.</p> <p>Red constraints in HELAA Townscapes and Biodiversity & Geodiversity.</p>
<p>HELAA Conclusion This partly brownfield site is proposed for residential and green infrastructure. It is in close proximity to the school, but in general there is a lack of services at this rural location. It is located to the south of Harbord Road adjacent to a narrow track to the west of the site. Initial highway evidence has indicated that potential access constraints could be overcome through development. Also, subject to suitable footpath provision, any potential impact on the functioning of local roads could be reasonably mitigated. Other constraints include the potential for localised contamination as a result of former gas works storage use and significant areas within low risk of surface water flooding. Furthermore, most of the site is covered by TPO trees including a veteran tree. A large proportion of the site is County wildlife Site and the Broads SAC/Broadland SPA and Crostwick Marsh SSSI are all on one site within a 1.5km radius. Norfolk Wildlife Trust has advised that limited development may be possible outside the CWS with enhancement of area within the CWS as a condition. There are a number of constraints affecting this site which do not seem to be possible to mitigate. The site is therefore concluded as unsuitable for the land availability assessment.</p>

FURTHER COMMENTS**Highways**

No. Access via Harbord Road not acceptable due to visibility constraints. Might be feasible if access can be gained via Freyden Way, vis would need to be demonstrated in accordance with Manual for Streets.

Development Management

Site has a history of refusals and dismissal at appeal. Heavily constrained by Tree Preservation Order and County Wildlife Site designation. Access arrangements unclear but understood to be constrained if via Harbord Road due to need for junction improvements. Does not appear suitable for further consideration.

Minerals & Waste

No safeguarded mineral resources

Lead Local Flood Authority

Few or no Constraints. Standard information required at a planning stage. RoSFW Mapping indicates that the majority of the site is at low risk of surface water flooding with minor ponding occurring in the 0.1% event. However, on the eastern edge of the site ponding occurs in the 3.3% period, this extends in the 1% event and in the 0.1% event a flow path develops which also impacts on the neighbouring residential area. Any planning application should be supported by modelling to understand the risk posed by the surface water flow path so that development can take place without increasing risk on or off site. There is no watercourse near the site, but the location on the edge of a village indicates that sewerage connections may be available. If not surface water disposal will be reliant on the results of infiltration testing.

PLANNING HISTORY:**20081092 & 20091376**

Site was previously subject to two applications (20081092 refused and 20091376 refused and dismissed) for residential development

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

- Site Proposals Plan
- GI Strategy

STAGE 7 – SETTLEMENT BASED APPRAISAL OF REASONABLE ALTERNATIVE SITES AND IDENTIFICATION OF PREFERRED SITE/S (WHERE APPROPRIATE) FOR REGULATION 18C DRAFT PLAN CONSULTATION.

Only one reasonable alternative site has been identified in the Frettenham cluster at stage five (GNLP0492). This site is partly covered by a County Wildlife Site but it was considered that the area of land outside the County Wildlife designation was worthy of further investigation to consider the potential for allocation. The site was subject to further discussion with Development Management, Highways, Flood Authority and Children’s Services and their comments are recorded under stage six above. After further consideration it was decided that the site was not appropriate for allocation as development in this location has already been tested through the planning application and appeal process. As well as the ecological and landscape issues of proximity to a County Wildlife Site the site is not acceptable in highway terms due to visibility constraints at Harbord Road.

Therefore, there are no preferred sites for allocation to meet the 50-60 dwelling capacity identified for the cluster and no allocations to be carried forward in this cluster. There are however 3 dwellings with planning permission on small sites.

Preferred Sites:

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Frettenham				
NO PREFERRED SITES				

Reasonable Alternative Sites:

Address	Site Reference	Area (ha)	Promoted for	Comments
Frettenham				
NO REASONABLE ALTERNATIVE SITES				

Unreasonable Sites:

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
Frettenham				
Land south of Harbord Road	GNLP0492	6.37	Residential (unspecified number and enabling large area of GI)	This site has a safe walking route to Frettenham Primary School but is not considered to be

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				<p>suitable for allocation as it has a number of constraints. The site is partly within a County Wildlife Site and is heavily constrained by Tree Preservation Orders and ecological and landscape issues. In highway terms access via Harbord Road would not be acceptable due to visibility constraints. Development in this location has already been tested through the planning application and appeal process.</p>
Adjacent 10 Buxton Road	GNLP2078	1.42	25 dwellings	<p>This site is considered to be unreasonable as it is remote from the main built up area of the village with no safe pedestrian route to Frettenham Primary School. The site appears to be surrounded by commercial development so residential development would not be a good fit here because of potential amenity issues.</p>

PART 2 - SUMMARY OF COMMENTS FROM THE REGULATION 18C DRAFT PLAN CONSULTATION

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0492 Land South of Harbord Road, Frettenham (Unreasonable Site – Residential)
TOTAL NUMBER OF REPRESENTATIONS:	5
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	4 Support, 1 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Members of the public - various	Support	<p>Comments in support of the site being unreasonable include:</p> <ul style="list-style-type: none"> • Previously rejected at highest appeals procedure, nothing has since changed • Harbord Road/Post Office Road junction unsuitable for increased traffic • No need given housing in Sprowston and Rackheath • Contested by villagers and Parish Council • Adjacent to country wildlife site • Outside settlement area of village • Part of woodland corridor within Broadland • Many trees on site 		Comments in support of site being unreasonable are noted	None

Lanpro Services Ltd	Object	<p>Comments objecting to the site being unreasonable:</p> <ul style="list-style-type: none"> • Council considers village could accommodate 50-60 additional homes. Reliance on windfall to fulfil this growth not appropriate, needs to be properly planned • Only the former gas storage works site (which is previously developed land) is for development. • CWS does not affect this area and the CWS is not currently accessible to public, nor is it managed. Possibility of public access to be explored. • Development can be achieved without impact on TPOs • Quantum of development on site is flexible • Within easy and safe walking distance of school • Adjacent to existing residential development • Junction improvements could be made to improve visibility if deemed necessary • Possible to surface alternate access if needed. 	Re-evaluate the potential on the brownfield part of the site.	Further discussions have taken place regarding this site following comments raised through the Reg 18C consultation. Even if only the brownfield part of the site were to be developed it is still not considered to be reasonable for allocation, primarily on highway grounds. The plots recently granted to round off development at the bottom of Harbord Road make access into the site more difficult. The Highway Authority has confirmed that a scheme to provide visibility from Harbord Road was agreed in 2011 but requires third party land at the north side of the	None
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				<p>Pound Hill/Post Office Road junction. It is not considered feasible to provide an acceptable access for the proposed site using highway land and they remain of the view that the applicant cannot provide acceptable access into the proposed site.</p>	
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2078 Adjacent 10 Buxton Road, Frettenham (Unreasonable Site – Residential)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Frettenham PC	Comment	In favour if footpath along Pound Hill is included		Comments noted	None
Matthew Hewitt via Nicole Wright (Agent)	Object	Plans are underway to provide a new footpath to link the site to the rest of the village. It is also adjacent to existing employment opportunities where proposals are in place to introduce new starter units for small businesses and community facilities. A planning application for a low carbon mixed use development is currently being prepared to be submitted in 2020. The proposals demonstrate how the amenity of new and existing residents would be protected and enhanced. Ecology and other technical surveys show that there are no insurmountable constraints to delivering a viable proposal		This site is considered to be unreasonable for allocation as it is remote from the main built up area of the village with no safe pedestrian route to Frettenham Primary School. The promoter states that plans are underway to provide a new footpath link to the rest of the village	None

				<p>but no detail has been provided to allow its suitability to be assessed.</p> <p>The site appears to be surrounded by commercial development so residential uses would not be a good fit here because of potential amenity issues. The promoter states that a planning application for low carbon mixed use development is being prepared which will demonstrate how the amenity of new and existing residents would be protected and enhanced, but again no detail has been submitted.</p>	
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**PART 3 - ASSESSMENT OF NEW & REVISED SITES SUBMITTED DURING THE
REGULATION 18C CONSULTATION**

No new or revised sites submitted.

FINAL CONCLUSIONS FOR THE REGULATION 19 VERSION OF THE PLAN

Site assessments prior to the Regulation 18C consultation

Up to the Reg 18C consultation there were two sites promoted for residential/mixed use in the Frettenham cluster totalling 7.79 hectares of land. The outcome of initial site assessment work (which is detailed in part 1 of this booklet) was that neither site was suitable for allocation, one due to its remoteness and the other due to a number of constraints on site. Therefore, no site was preferred and this option was consulted on as part of the Regulation 18C draft plan consultation

Summary of comments from the Regulation 18C draft plan consultation

Through the Regulation 18C consultation a number of comments were submitted regarding the sites promoted in Frettenham (see part 2 above). The main issues raised were that the previously developed element of site GNLP0492 should be allocated and that GNLP2078 should be considered for allocation as there are plans to provide a footway linking the site to the village. These comments were considered, including further discussion with Development Management and Highways colleagues but no change is proposed to the decision not to allocate any sites in the cluster.

Assessment of new and revised sites submitted through the Regulation 18C consultation

No new or revised sites were submitted through the consultation. Therefore there was no challenge to the proposal not to allocate a site in Frettenham.

Sustainability Appraisal

The sustainability performance of each reasonable alternative site has been considered in the selection of sites. The Sustainability Appraisal (which can be found in the evidence base [here](#)) includes a scoring and assessment narrative on the sustainability performance of each reasonable alternative and recommendations for mitigation measures which have been incorporated in policy requirements as appropriate. Site GNLP0492 was the only reasonable alternative site subject to SA and it only scored two positive scores for housing and economy. There is some conflict between the assessment of the site by Highways and the SA which says it is well connected but that is likely due to the fact that the local highway authority will have used different criteria when examining the sites.

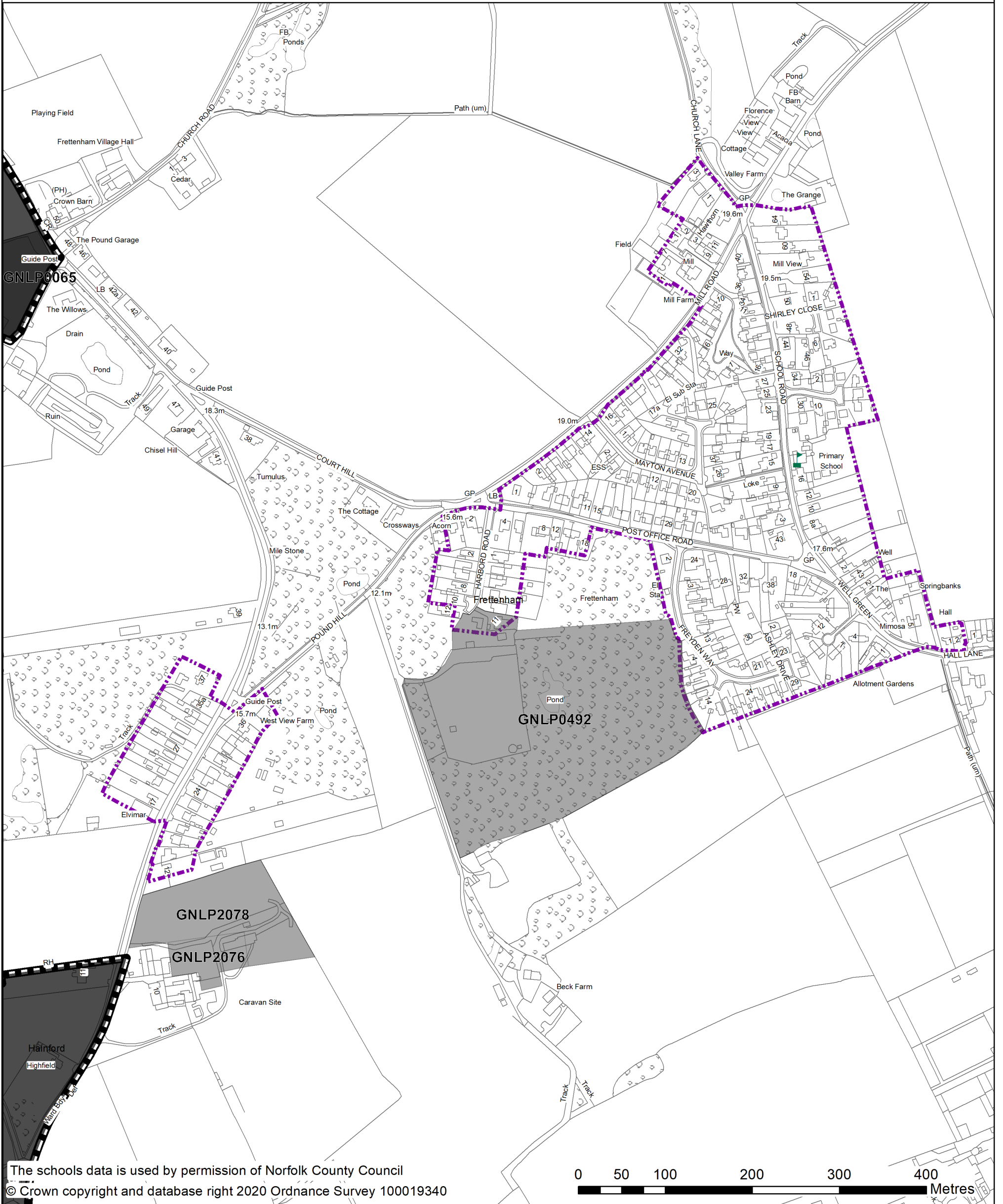
Final conclusion on sites for allocation in the Regulation 19 Plan

Based on all the information contained within this booklet the final conclusion of the site assessment process for Frettenham is not to allocate any sites, as promoted through the Regulation 18C consultation.






See tables of allocated and unallocated sites at appendices A and B for a full list of sites promoted with reasons for allocation or rejection.

FRETtenham


GREATER NORWICH LOCAL PLAN PROMOTED SITES BY SCHOOL CATCHMENT AREAS



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-  Primary School
-  Settlement Boundary
-  Primary School Catchment (2018-19)
-  Parish Boundary
-  Not Allocated

*new and extant permissions at 1st April 2020 (10 or more dwellings)


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 at A3
 Date: 03/12/2020