Settlement Name:	Hainford and Stratton Strawless
Settlement Hierarchy:	Hainford and Stratton Strawless form a village cluster in the emerging Greater Norwich Local Plan, although no sites have been promoted in Stratton Strawless. The Towards a Strategy document identifies that 2,000 dwellings in total should be provided between all the village clusters. Services in the cluster include a primary school, village hall and public transport.
	The current capacity at Hainford Primary School is rated as green. The school is currently not up to its Published Admission Number and is not landlocked in such a way as to prevent future expansion. Consequently, it is considered that the Hainford cluster could accommodate development in the region of 50-60 dwellings. At the base date of the plan there are no carried forward residential allocations but there is a total of 7 additional

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			
Hainford						
Land at the junction of Frettenham Road and Buxton Road	GNLP0065	1.04	10-12 dwellings			
Land off Stratton Road	GNLP0069	10.70	Approx. 404 dwellings with associated open space			
Land at Hall Road	GNLP0181	1.16	Approx. 20 dwellings			
Arable Land, Hall Lane	GNLP0190	8.44	Residential (unspecified number), with potential recreation area and leisure community use and open space.			
Land at Hainford	GNLP0393	1.51	Approx. 45 dwellings			
Lady Lane / Hall Road	GNLP0512	3.60	Approx. 12 dwellings			
Land East of Newton Road	GNLP0582	3.00	60-80 dwellings with consideration of community use			
West of Cromer Road	GNLP2035	2.31	25 dwellings			
Harvest Close	GNLP2162	2.50	60 dwellings			
Total area of land		34.26				

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

Address		Proposal		
		Hainfo	rd	
Chapel Close	Road/Harvest	GNLP3046	0.27	6-8 dwellings

(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
None			

(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 Gl	Transport & Roads	Compatibility with neighbouring uses
Site Reference														
						На	inford							
GNLP0065	Amber	Amber	Amber	Green	Green	Amber	Amber	Green	Amber	Amber	Green	Green	Amber	Green
GNLP0069	Amber	Amber	Amber	Green	Green	Amber	Amber	Green	Amber	Amber	Green	Green	Amber	Green
GNLP0181	Amber	Amber	Amber	Green	Green	Amber	Amber	Green	Amber	Amber	Green	Green	Amber	Amber
GNLP0190	Amber	Amber	Amber	Green	Green	Green	Amber	Green	Amber	Amber	Green	Green	Amber	Amber
GNLP0393	Amber	Amber	Amber	Green	Green	Amber	Amber	Green	Amber	Amber	Green	Amber	Amber	Green
GNLP0512	Amber	Amber	Amber	Green	Green	Amber	Amber	Green	Amber	Amber	Green	Green	Amber	Green
GNLP0582	Amber	Amber	Amber	Green	Green	Amber	Amber	Green	Amber	Amber	Green	Green	Amber	Green
GNLP2035	Amber	Amber	Green	Green	Amber	Amber	Green	Green	Amber	Amber	Green	Green	Amber	Green
GNLP2162	Amber	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Amber	Green

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

Site	Comments
Reference	Hainford
GNLP0065	General comments The site is outside the development boundary and is in conflict with the status of "other village" and the Parish Plan. The site is not contiguous with Hainford and there is a reliance on narrow roads which are inadequate and the junction from Frettenham Road has visibility issues. The development is unsustainable due to lack of infrastructure and services. Residents of the development would be more likely to use the amenities of Frettenham.
	The area is characterised by many old, large and architecturally interesting houses which represent a countryside environment. We recognise the need for affordable housing and large houses to retain the character of the village. However, services should be kept to a minimum to keep it rural. The access road is very narrow which has witnessed many accidents. Buxton Road already has a problem with speeding.
	The village has a high water table and most areas are therefore subject to flooding. Services and infrastructure are limited are can barely cope with the existing population. There are poor road links and public transport services with nothing to support commuting to Norwich. This would encourage travel by car.
	Hainford used to have a post office and shop but these closed and community has suffered. New development would hopefully add life to the village.
	Hainford Parish council comments Objects on the grounds that the site is outside the development boundary, impact on setting of Hainford Hall, flood risk & drainage issues, conflicts with status of 'other village' and parish plan. Lacks infrastructure and facilities, very limited public transport and school inaccessible by footway and lacks capacity.
GNLP0069	General comments The proposal is outside the settlement boundary and is in conflict with the Hainford village status of "other village". Hainford is a village, not a suburb. It is disproportionate to the size of the village and would represent an 80% increase in population.
	The road and sewerage networks would be unable to cope with the increased use. There would unsafe access onto the B1354 and increased congestion on A140. The area is subject to flooding due to the high water table in the village. There is a lack of infrastructure

services as there are many power cuts and the bus service is inadequate. There would be a detrimental impact on mature trees. The development is in conflict with Hainford being an "other village". The site is on valuable arable land. Access road would affect the peaceful setting of the church.

Hainford has suffered from losing its post office and shop so new development would hopefully improve the amenities.

Hainford Parish council comments

Objects on the grounds that the site is outside the development boundary, it's too large and disproportionate to existing settlement, impact on setting of Hainford Hall, flood risk & drainage issues, conflicts with status of 'other village' and parish plan. Lacks infrastructure and facilities, very limited public transport and school inaccessible by footway and lacks capacity.

GNLP0181

General comments

20 houses seems excessive and the site is outside of the development boundary. The village has a very high water table and many areas are subject to surface water flooding. Narrow roads with no pavements are unsuitable for increased traffic. The infrastructure is poor e.g. there are limited power supplies, slow broadband, poor mobile connectivity, and a sporadic bus service.

The proposal is outside of the settlement boundary and in conflict with Hainford village status of "other village". The site is in conflict with the Parish Plan. There are also issues with flooding, infrastructure, power cuts and sewerage system. The development will impact upon the setting of Hainford Hall.

Hainford used to have a post office and shop which have since closed. New development would hopefully improve amenities. This site is also near the Village Hall which is a hub of activity and new development would only encourage this.

Hainford Parish council comments

Objects on the grounds that the site is outside the development boundary, impact on setting of Hainford Hall, flood risk & drainage issues, conflicts with status of 'other village' and parish plan. Lacks infrastructure and facilities, very limited public transport and school inaccessible by footway and lacks capacity.

GNLP0190

General comments

The proposal is outside the settlement boundary, in conflict with the status of "other village" and the Parish Plan. Development of this scale would change the nature of the village forever. There is inadequate sewerage capacity, public transport, electric supply, no social infrastructure, drainage capacity. If the development went

ahead the drains should go in the direction of Buxton Road. Hall Road has a lot of traffic already.

The proposal is outside the settlement boundary, in conflict with the status of "other village" and the Parish Plan. Development of this scale would change the nature of the village forever.

Comments submitted in support of site. The site is considered suitable for development and would potentially improve amenities.

This development would have little effect on the village as it is behind the car spare yard. Houses could potentially encourage someone to rescue Hainford Hall if they overlook it.

Hainford Parish council comments

Objects on the grounds that the site is outside the development boundary, impact on setting of Hainford Hall, flood risk & drainage issues, conflicts with status of 'other village' and parish plan. Lacks infrastructure and facilities, very limited public transport and school inaccessible by footway and lacks capacity.

GNLP0393

General comments

The proposal is outside the settlement boundary and in conflict with the village status of "other village" and the Parish Plan. There are issues with flooding, parking, lack of capacity in the school, lack of infrastructure and services. The site has a high water table, floods on a regular basis and has been previously objected by the Environment Agency. It will infringe on the setting of the church and school car park. There will be a loss of mature trees.

If some of the land was used for school facilities then that would be OK. However some of the land is owned by the Diocese of Norwich who won't allow any permanent development.

There are issues with flooding, parking, lack of capacity in the school, lack of infrastructure (social and transport) and services. There is no public transport to support commuting to Norwich. The site has a high water table, floods on a regular basis and has been previously objected by the Environment Agency. The number of homes is disproportionate to the size of the village.

Comment in support of the sites as more people could mean that the village facilities improve. Hainford used to have a post office and shop but these have closed and the village has suffered. New development would add life to the village and improve amenities.

Some of this site could be used for the school e.g. car park. Building more family sized houses will ensure more pupils attend the school and save it from potential closure as most kids go elsewhere.

Hainford Parish council comments

Objects on the grounds that the site is outside the development boundary, impact on setting of Hainford Hall, flood risk & drainage issues, conflicts with status of 'other village' and parish plan. Lacks infrastructure and facilities, very limited public transport and school lacks capacity.

GNLP0512

General comments

There are issues with flooding, parking, lack of capacity in the school, lack of public transport, lack of social infrastructure and services. The site has a high water table, floods on a regular basis and the proposal is not contiguous with existing settlement. Loss of protected trees is an issue. The site is on a single track road with no street lighting, footpaths etc. Sewerage system cannot cope. Site is outside of the development boundary.

The proposal is outside the settlement boundary and in conflict with the village status of "other village" and the Parish Plan. There are issues with flooding, parking, lack of capacity in the school, lack of public transport, lack of social infrastructure and services. The site has a high water table, floods on a regular basis and the proposal is not contiguous with existing settlement.

Lady Lane will not support higher volumes of traffic as it is single file. The development will spoil the outlook of the village. There will be an adverse effect on a wide range of wildlife. Many walkers, cyclists etc. go around the block so development would make it dangerous for them. Inadequate sewerage and electrical systems.

Hainford used to have a post office and shop but these have closed and the village has suffered. New development would add life to the village and improve amenities. Houses are already in the area so it makes sense to build here.

Hainford Parish council comments

Objects on the grounds that the site is outside the development boundary, impact on setting of Hainford Hall, flood risk & drainage issues, conflicts with status of 'other village' and parish plan. Lacks infrastructure and facilities, very limited public transport and school lacks capacity.

GNLP0582

General comments

The proposal is outside the settlement boundary and in conflict with the village status of "other village" and the Parish Plan. There are issues with flooding, parking, lack of capacity in the school, lack of public transport, lack of social infrastructure and services. The site has a high water table, floods on a regular basis and the proposal is not contiguous with existing settlement. Loss of protected trees is an issue. The site is on a single track road with no street lighting,

footpaths etc. Sewerage system cannot cope. Site is outside of the development boundary.

Hainford Parish Council comments

Objections raised concerns regarding scale, aspect and status of site. Issues raised include flood risk, drainage issues, tree preservation, agricultural impacts, inadequate infrastructure and roads with increased congestion at junction with B1354 and A140. The school is not accessible by footway and has insufficient capacity.

GNLP2035 Gei

General comments

Objections raised concerns regarding conserving the natural environment, road safety issues, access, flooding, drainage and infrastructure. Concern that the form and character of the village would be changed by development.

Objections raised regarding flooding and drainage. Concern that the form and character of the village would be changed by development.

Hainford Parish council comments

This site is outside the current development boundary and being remote from the main part of the village is totally disconnected from it with no pavements to access the school. There are no nearby facilities of any kind and any residents would have to rely on motor vehicles or the limited public bus service to access employment or shopping. Access to the development would be from the A140 which is difficult with fast flowing traffic in both directions. The site has a risk of flooding and there are nearby protected woodlands and species.

GNLP2162

General comments

Objections raised concerns regarding conserving the natural environment, road safety issues, access, flooding, drainage and infrastructure. Concern that the form and character of the village would be changed by development.

Comments received regarding site promotion to date, review of evidence base, addendum to the HELAA, Alternative Scale of Development, Delivery and Conclusions.

Hainford Parish council comments

This site is again outside the current development boundary and is totally disproportionate to the categorisation of "other" village". The surrounding area particularly Chapel Road and Dumbs Lane have repeated flooding problems with unresolved drainage issues. The Council is also doubtful that existing sewerage systems could cope with this size of development.

The local road system is very narrow and has no pavements to access the school making it totally unsuitable for an increase in housing in this area.

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

Nine residential sites larger than 0.5ha have been promoted in Hainford, with no sites submitted elsewhere in the cluster. The sites vary in scale, ranging from 0.27 ha to 10.7 ha. The majority of sites could not provide a safe walk with a footpath to the primary school on Newton Street and are therefore not considered to be reasonable alternatives for further assessment. The exceptions are GNLP0393 and GNLP0069. A footpath leads northwards of the school connecting Newton Street to Waterloo Road and Hainford Road. GNLP0393 is adjacent to the school, and GNLP0069 is 900 metres away. GNLP0393 is shortlisted for further assessment, as is GNLP0069 subject to a revised site boundary more appropriate to the scale of development sought in Hainford.

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		
	Hainfo	ord			
Land off Stratton Road	GNLP0069	10.70	Approx. 404 dwellings with associated open space		
Land at Hainford	GNLP0393	1.51	Approx. 45 dwellings		
Total area of land		12.21			

STAGE 6 – DETAILED SITE ASSESSMENTS OF REASONABLE ALTERNATIVE SITES

Site Reference:	GNLP0069
Address:	Land off Stratton Road
Proposal:	Approx. 404 dwellings with associated open space

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA

Amber Constraints in HELAA

Site Access, Accessibility to Services, Utilities Capacity, Flood Risk, Market Attractiveness, Sensitive Townscapes, Biodiversity & Geodiversity, Transport & Roads

HELAA Conclusion

This site lies to the north of Waterloo, just north of a recent permission on Stratton Road. Initial highway evidence has indicated that a suitable access could be achieved, but that the site is remote from services, although there is a bus stop and primary school within walking distance. It is likely that sewerage infrastructure would need to be upgraded and parts of the site are at risk of surface water flooding, but there are no known constraints from utilities infrastructure, contamination or ground instability. There would be no impact on sensitive landscapes or public open space, but there are listed buildings nearby and the site is within the impact risk zone of a SSSI. Although the site is constrained, it is considered suitable for the land availability assessment.

FURTHER COMMENTS

Highways

No. No access and feasibility of providing footway, concern also with visibility at B1354 Waterloo Road

Hainford Road is narrow and it doesn't appear feasible to widen to an acceptable standard and provide a footway to connect with the existing facility to the south. Additionally, there is concern that the highway extent at the north west corner of the Stratton Road junction with Waterloo Road is a constraint. Visibility requires on sight lines across private land and as such, development at this location would not be supported due to highway concern associated with traffic increase. Email from Highways 26/7/19

Development Management

Site has significant landscape impacts and would not be very well related to existing settlement.

As submitted the proposal is unacceptable from a DM perspective. We have also considered a potentially smaller allocation to the west of the proposed allocation

along the frontage of Hainford Road similar to the recent development to the south however serious concerns remain regarding the visual impact of this and the breakout into the countryside. We appreciate that new development will have a landscape impact and this has to be accepted but this is an attractive piece of countryside that is not currently affected by the existing built development. From recollection there were also highway concerns with this site which may need to be understood better to see if mitigation can be designed in? Email Development Management 25/7/19

Minerals & Waste

The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

Lead Local Flood Authority

Few or no Constraints - Standard information required at a planning stage.

PLANNING HISTORY:	
None	

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

No additional documents submitted to support this proposal.

Site Reference:	GNLP0393
Address:	Land at Hainford
Proposal:	Approx. 45 dwellings

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA

Amber Constraints in HELAA

Site Access, Accessibility to Services, Utilities Capacity, Flood Risk, Market Attractiveness, Sensitive Townscapes, Biodiversity & Geodiversity, Open Space & GI, Transport & Roads

HELAA Conclusion

This site lies to the south of Waterloo, separated from the hamlet by a small field and appears to partially overlap the school car park. Initial highway evidence has indicated that a suitable access could be achieved, and that any impact on local roads could be mitigated. There is a bus stop and primary school within walking distance. It is likely that sewerage infrastructure would need to be upgraded and parts of the site are at risk of surface water flooding, but there are no known constraints from utilities infrastructure, contamination or ground instability. There would be no impact on sensitive landscapes, but development is likely to affect the setting of listed buildings including the church and impact on the school car park capacity, and the site is in the impact risk zone of a SSSI. Although the site is constrained, it is considered to be suitable for the land availability assessment.

FURTHER COMMENTS

Highways

Reserve Frontage 110m. Visibility not achievable without wholesale removal of trees at frontage.

Development Management

History of the site suggests drainage and flood risk issues. Also, significant impact on setting of church which Historic Environment Officers object to.

Minerals & Waste

The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. As the site is under 2 hectares it is exempt from the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 – 'safeguarding', in relation to mineral resources. If the site area is amended in the future to make the area over 2 hectares CS16 (or any successor policy) will apply.

Lead Local Flood Authority

Mitigation required for heavy constraints - Significant information required at a planning stage. Flowpath crosses site from east to west. No watercourse or SW sewer visible on mapping if infiltration unsuitable

PLANNING HISTORY:

20090013

Withdrawn due to Environment Agency objections.

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

No additional documents submitted to support this proposal.

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

Two reasonable alternative sites have been identified in the Hainford and Stratton Strawless cluster at stage 5. These sites were considered to be worthy of further investigation to look at their potential for allocation as the initial assessment did not flag up any major constraints that would preclude allocation. These sites have been subject to further discussion with Development Management, Highways, Flood Authority and Children's Services in order to identify preferred sites for allocation and their comments are recorded under stage six above. As part of this further discussion it was agreed that neither site was suitable for allocation. Site GNLP0069 was discounted on landscape and highway grounds and despite site GNLP0393's location next to the school it was discounted on grounds of surface water flood risk.

Therefore, whilst it is considered the cluster could accommodate development of 50-60 additional homes, there are currently no new allocations proposed and no allocations to be carried forward in this cluster. There are however 7 dwellings with planning permission on small sites.

Preferred Sites:

Address	Site Reference		Proposal	Reason for allocating			
Hainford and	Hainford and Stratton Strawless						
NO PREFERR	ED SITES						

Reasonable Alternative Sites:

Address	Site Reference		Promoted for	Comments			
Hainford and	Hainford and Stratton Strawless						
NO REASONABLE ALTERNATIVE SITES							

Unreasonable Sites:

Address	Site Reference		Promoted for	Reason considered to be unreasonable
Hainford and St	ratton Strawl	ess		
Land at the junction of Frettenham Road and Buxton Road	GNLP0065	1.04	10-12 dwellings	This site is not considered to be suitable for allocation as there is no safe pedestrian route to Hainford Primary School and due to the

Address	Site	Area	Promoted for	Reason considered to
Addiess	Reference	(ha)	Tromoted for	be unreasonable
				distance it would not be feasible or viable to provide one.
Land off Stratton Road	GNLP0069	10.70	Approx. 404 dwellings with associated open space	This site is considered to be unreasonable for allocation as even a smaller area of development than the site proposed would have a significant visual impact and breakout into open countryside. There are also highway concerns. Hainford Road is narrow, and it is unlikely to be feasible to widen it to an acceptable standard and provide a footway to connect with the existing footway to the south. The highway extent at the north west corner of the Stratton Road junction with Waterloo Road is also a constraint with compromised visibility.
Land at Hall Road	GNLP0181	1.16	Approx. 20 dwellings	Although this site is adjacent to the existing settlement limit it is not considered reasonable for allocation as there is no safe pedestrian route to Hainford Primary School and due to the distance it would not be feasible or viable to provide one.
Arable Land, Hall Lane	GNLP0190	8.44	Residential development (unspecified number) with potential recreation area and leisure, community use and open space	This is site is considered to be unreasonable for allocation as it is located some distance from the existing settlement limit and development in this location would be out of keeping with the form and character of

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				Hainford. There is no safe pedestrian route to Hainford Primary School and due to the distance it would not be feasible or viable to provide a footway.
Land at Hainford	GNLP0393	1.51	Approx. 45 dwellings	This site is well located next to Hainford Primary School however it is not considered appropriate for allocation due to significant surface water flood issues.
Lady Lane/ Hall Road	GNLP0512	3.60	Approx. 12 dwellings	This site is not considered to be suitable for allocation as there is no safe pedestrian route to Hainford Primary School and due to the distance it would not be feasible or viable to provide one.
Land east of Newton Road	GNLP0582	3.00	60-80 dwellings with consideration of community use	This site is not considered to be suitable for allocation as there is no safe pedestrian route to Hainford Primary School and due to the distance it would not be feasible or viable to provide one.
West of Cromer Road	GNLP2035	2.31	25 dwellings	This site is considered to be unreasonable for allocation as it is quite some distance from the existing settlement limit and development in this location would be out of keeping with the form and character of Hainford. There is no safe pedestrian route to Hainford Primary School and due to the distance it would not be feasible or viable to provide a

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				footway. Direct vehicular access onto the A140 is unlikely to be acceptable.
Harvest Close	GNLP2162	2.50	60 dwellings	Although this site is adjacent to the existing settlement limit it is not considered reasonable for allocation as there is no safe pedestrian route to Hainford Primary School and due to the distance it would not be feasible or viable to provide a footway.

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

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0181 Land at Hall Road, Hainford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 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
Site Promoter	Object	Revised site boundary submitted.		This site has been revised from 1.16ha to 1.04ha. The original site was considered to be unreasonable for allocation as there was no safe walking route to primary school. No evidence has been submitted with the revised site to	None

	demonstrate how a safe walking route could be achieved so the	
	site is still considered to be unreasonable for allocation.	

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0393 Land at Hainford, Hainford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 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
Savills on behalf of Diocese of Norwich	Object	 Comments objecting to the site being unreasonable: Site can meet identified housing need (50-60 as identified in sites document) Village Hall, primary school (which has spaces) and public transport within walking/cycling distance of site. Site is immediately adjacent to school, and Diocese could facilitate school expansion if necessary and part of the site could accommodate a car park for use by the school 		Despite its location adjacent to the primary school this site is not considered to be reasonable for allocation due to significant surface water flood issues and heritage concerns about impact on nearby church. The LLFA have commented that a flow path crosses the site from east to west	None

 Area is well related to Norwich with A140 close by and bus stop 150m from site. Well related to existing settlement and it's boundary. Allocating the site would connect the school to the village. Access will be via Newton Road. Current access and carparking for the school would be incorporated into overall development plan for the site. Client has already installed a TROD footpath to provide access to the school and this could be upgraded through development Could incorporate SUDs to address pressures on site drainage and run off. Not locate on a flood zone 2 or 3, not subject to any PROW. Electric, water, sewerage and telecoms all available. 	and mitigation would be required for heavy constraints with significant information required at a planning stage. Without additional evidence the deliverability of the site is uncertain

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2162 Harvest Close, Hainford (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 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
Westmore Homes, Agent: Armstrong Rigg Planning	Object	Land adjacent to site has been acquired so it is now possible to provide a safe continuous segregated footway from Harvest Close to the primary school via a new 1.5m wide footpath to Newton Road then a further footway along the highway verge. There are no other constraints and building here will provide up to 60 dwellings including a proportion of affordable housing in line with GNLP policy as well as public open space and a new children's local area of play.	Liaise with Highways colleagues regarding suitability of footpath proposals	Further discussions have taken place with the highway authority regarding this site. Their view remains that the current road network is not of sufficient standard to support development traffic. Newton Road is presently narrower than the minimum required width of 5.5m and	

	the proposal seeks to further reduce the width of the road to provide a narrow footway. Therefore the site is still considered to be unreasonable for allocation. The highway authority have also stated they would be likely to object to any planning application that

PART 3 - ASSESSMENT OF NEW & REVISED SITES SUBMITTED DURING THE REGULATION 18C CONSULTATION

STAGE 1 – LIST OF NEW &REVISED 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	Status at Reg 18C
Hainford and Stratt	on Strawless	, ,		
Land at Hall Road, Hainford	GNLP0181R	1.04	Housing	Unreasonable
South of B1354, Hainford	GNLP4022	3.96	40 dwellings	New site
Shortthorn Road, Stratton Strawless	GNLP4038	0.51	10 dwellings	New site
TOTAL		5.51		

STAGE 2 – HELAA COMPARISON TABLE

Site reference	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 & GI	Transport & roads	Compatibility with neighbouring uses
Hainford and	Stratton	Strawless	5											
GNLP0181R	Amber	Amber	Amber	Green	Green	Amber	Green	Green	Amber	Amber	Green	Green	Amber	Amber
GNLP4022	Amber	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green
GNLP4038	Amber	Red	Green	Green	Green	Green	Amber	Amber	Green	Green	Amber	Green	Amber	Green

STAGE 3 – SUMMARY OF COMMENTS FROM THE REGULATION 18 STAGE C CONSULTATION

(See Part 2 above)

STAGE 4 - DISCUSSION OF NEW & REVISED 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, consultation responses received and other relevant evidence.

Hainford and Stratton Strawless

GNLP0181R, Land at Hall Road, Hainford, 1.04ha, housing

This greenfield site adjacent to the existing settlement boundary has been revised from 1.16ha to 1.04ha. The original site was not shortlisted at Stage 5 of the Hainford site assessment booklet as there is no safe walking route to primary school. No evidence has been submitted with the revised site to demonstrate how a safe walking route could be achieved so the site is considered still to be unreasonable for allocation.

GNLP4022, South of B1354, Hainford, 3.96ha, 40 dwellings

This is a greenfield site of 3.96 ha proposed for 40 dwellings and open space off Old Church Road and Newton Rd. It is adjacent to the settlement boundary, with residential development both to the north and west of the site, and agricultural land and a vets surgery to the east and as such it could be considered sympathetic to the character of the village. Access may be achievable via Old Church Road or Newton Road, though there are hedges and large trees which will need to be considered. Initial highway evidence suggests that the site may be suitable subject to access at

Newton Road with acceptable visibility, provision of a 2 metre footway for the full extent of the site frontage, active frontage at Newton Road and visibility improvements from Newton Road eastwards to the B1354. There is a bus stop adjacent to the north western boundary and the primary school is within 350m of the site with a continuous footway. There are a number of Grade II listed buildings in the vicinity which may require consideration, including The Chequers Public House, the Church of All Saint and the Hainford war memorial. Overall the site is shortlisted as reasonable for further consideration subject to internal consultee comments.

GNLP4038, Shortthorn Road, Stratton Strawless, 0.51ha, 10 dwellings

This 0.51ha greenfield site, located north of Shortthorn Road and Serpentine Lane, currently used for equestrian purposes is proposed for 10 dwellings where there is no existing settlement boundary. The site is considered to be unreasonable for allocation as there is no safe walking route to the primary school in Hainford which is 3km away. Initial highway advice highlights the location of the site on a bend/junction, which may make it difficult to achieve suitable access. The site is surrounded by mature trees and hedgerows which would also need consideration. The site is opposite Brickkiln Grove County Wildlife Site.

STAGE 5 – SHORTLIST OF REASONABLE ALTERNATIVE NEW & REVISED SITES FOR FURTHER ASSESSMENT

Address	Site Reference	Area (ha)	Proposal		
Hainford and Stratton Strawless					
South of B1354, Hainford	GNLP4022	3.96	40 dwellings		
TOTAL		3.96			

STAGE 6 – DETAILED SITE ASSESSMENTS OF REASONABLE ALTERNATIVE NEW & REVISED SITES

Site Reference:	GNLP4022
Address:	South of B1354, Hainford
Proposal:	40 dwellings

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agriculture	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA

Amber Constraints in HELAA

Access, Accessibility to Services, Utilities Infrastructure, Historic Environment

HELAA Conclusion

This is a greenfield site of 3.96 ha proposed for 40 dwellings and open space off Old Church road and Newton Rd. It is adjacent to the settlement boundary, with residential development both to the north and west of the site, and agricultural land and vets to the east as such it could be considered sympathetic to the character of the village. Access may be achievable via Old Church Road or Newton Road, though there are hedges and large trees which will need to be considered. Initial Highways advice that subject to access at Newton Road only with acceptable visibility, provision of 2.0m footway for full extent of site frontage, active frontage at Newton Road and visibility improvement from Newton Rd north eastwards to B1354. There is a bus stop adjacent to the north-western boundary, and Hainford VC Primary School is within 350m of the site with a continuous walking path. Other facilities, such as GP, dentist and pharmacy are in the neighbouring areas of Horsford, Horsham St Faith and Spixworth, all over 4km from the site. There are limited employment opportunities in the area, though there is a direct route into Norwich on the A140 or the B1150 Buxton Road. There are no known constraints from utilities infrastructure or contamination. There are a number of Grade II listed buildings in the range of approximately 100 -300 m, which may require considerations in terms of views; The Chequers Public House is 150m to the north, the Church of All Saint and Hainford War Memorial are over 200m to the south. There are no concerns over flood risk, the loss of designated public open space or loss of high-quality agricultural land as it is grade 3, however, the Waterloo Plantation County Wildlife Site is 300m to the west. In conclusion, although there are some potential constraints identified the site is considered suitable for the land availability assessment.

FURTHER COMMENTS

Highways

Subject to improvement at B1354 Waterloo junction with Newton Road to improve visibility to west, frontage footway and active frontage development at Waterloo Rd and enhancement to existing 30mph speed limit. Widening required at Newton Rd to a minimum of 5.5m. Part time 20mph speed limit required at school. Highway requirements will require removal of trees and hedges.

Development Management

The village has not really developed in that location historically. This site is not infill between other sites so development here would be going against the grain. Would make it difficult to resist further applications. Landscape concerns due to open fields at Newton Road.

Lead Local Flood Authority

GREEN – Surface water flood risk on site but not sever enough to prevent development, few or no constraints, standard information required at a planning stage. No internal & external flooding on site or within 500m. No watercourses on site or within 100m. No surface water sewer systems on site or within 100m. In Source Protection Zone 3. The site predominantly has superficial deposits of clay, silt and sand. Comments on infiltration potential are dependent on a complete geotechnical investigation.

PLANNING HISTORY:		

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

- Planning Statement
- (Site submission form and boundary plan)

STAGE 7 – INITIAL CONCLUSIONS ON THE SUITABILITY OF NEW AND REVISED SITES FOR ALLOCATION

The new and revised sites shortlisted at Stage 4 have been subject to further consideration with Development Management, the Local Highway Authority and Lead Local Flood Authority and their comments are recorded under Stage 6 above. Based on their views the following initial conclusions regarding the suitability of the sites for allocation have been drawn.

New and revised sites to be considered for allocation:

None

New and revised sites considered to be unreasonable for allocation:

Address	Site Reference	Area (ha)	Promoted for	Reason for rejection	
Land at Hall Road	at Hall GNLP0181		Approx. 20 dwellings	Although this site is adjacent to the existing	
	GNLP0181R	1.04	Housing	settlement limit it is not considered reasonable for allocation as there is no safe pedestrian route to Hainford Primary School and due to the distance it would not be feasible or viable to provide one. The site was revised through the Regulation 18C consultation but no additional evidence has been submitted to demonstrate how a safe walking route to school could be achieved so it is still considered to be unreasonable for allocation	
South of B1354, Hainford	GNLP4022	3.96	40 dwellings	This site is not considered suitable for allocation due to landscape concerns and the fact that it would set a precedent and make future development in that location difficult to resist	
Shortthorn Road, Stratton Strawless	GNLP4038	0.51	10 dwellings	This site is considered to be unreasonable for allocation as there is not safe walking route to Hainford Primary School which is 3 km away. Initial highway advice highlights	

Address	Site Reference	Area (ha)	Promoted for	Reason for rejection
				the location of the site on a bend/junction which may make it difficult to achieve suitable access.

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 9 sites promoted for residential/mixed use in the Hainford cluster totalling around 600 dwellings (with one site not specifying how many dwellings) and 34.26 hectares of land. The outcome of initial site assessment work (which is detailed in part 1 of this booklet) was that none of the sites promoted were suitable for allocation, primarily due to the fact that they did not have a safe walking route to the primary school. One site (GNLP0393) is located adjacent to the primary school but was not considered to be suitable for allocation due to flood issues. 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 Hainford. The main issues raised were in relation to sites GNLP0393 and GNLP2162. The promoter of GNLP0393 suggested that the site is suitable for allocation as flood issues can be overcome. This was given further consideration but without additional evidence to demonstrate this deliverability was considered to be uncertain bearing in mind LLFA advice that mitigation would be required for heavy constraints. The promoters of site GNLP2162 have put forward additional highway evidence including the potential for a safe walking route to school but this is not supported by the local highway authority. Therefore 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

Two new sites and one revision to an existing site were put forward through the Regulation 18C consultation totalling around 5.50ha of land. All the new and revised sites were subject to the same process of assessment as the earlier sites (detailed in part 3 of this booklet). The conclusion of this work was that none of the sites were suitable for allocation, two do not have a safe walking route to the primary school and the other raises landscape concerns and would set a precedent making further development in that location difficult to resist.

Sustainability Appraisal

The sustainability performance of each reasonable alternative site has been considered in the selection of sites. The Sustainability Appraisal 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. The Sustainability Appraisal (insert link) highlighted a number of negative and positive impacts for the sites in the Hainford. Site GNLP0069 scored 3 double negatives whereas GNLP0393 scored reasonably well in the SA but was dismissed through the site assessment process on flood risk grounds. Site GNLP4022 scored just one double negative but was not favoured through the site assessment process on landscape grounds.

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 Hainford 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.

