

Cluster Name:	Long Stratton and well related part of Tharston and Hapton parish
Settlement Hierarchy:	<p>Long Stratton is a large village which is set to grow into a small town, with Long Stratton having recently become a Town Council, and it is therefore identified as a Main Town in the Greater Norwich Local Plan. The settlement includes land that falls within the parish of Tharston and Hapton on its western edge. Current plans for Long Stratton, set out in Long Stratton Area Action Plan (May 2016), allocate a minimum of 1,800 new houses, 12 hectares of employment, an enhanced town centre and supporting infrastructure including a by-pass on the eastern side of the settlement.</p> <p>Long Stratton has a good range of services and facilities that are mainly located along The Street (A140). On the western side of the town there are primary and secondary schools, a leisure centre, the district council offices, and Tharston Industrial Estate. The historic core of Long Stratton evolved north-south along the A140 but in recent decades estate development has been added away from this area. In terms of the landscape and environment, the Tas Valley is to the west and various designated common lands are to the east and south.</p> <p>In 2016 a Neighbourhood Plan area for Long Stratton was agreed that covers the same area as Long Stratton Area Action Plan. The Neighbourhood Plan is currently being progressed.</p> <p>At the base date of the plan there are no carried forward allocations but a total of 1,892 additional dwellings with planning permission.</p> <p>Early work in the Towards a Strategy document identifies Long Stratton as a Town (together with Aylsham, Diss, Harleston and Wymondham) and suggests that circa 900 – 1000+ additional homes should be provided between them. This site assessment booklet looks in detail at the sites promoted in Long Stratton to determine which are the most suitable to contribute towards the overall allocation figure for the Main Towns.</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
Long Stratton			
Land south of St Mary's Road	GNLP0509	3.60	60-100 dwellings with associated open space
Tharston & Hapton (part of parish adjacent to Long Stratton)			
Land west of Chequers Road	GNLP0142	1.74	Residential (unspecified number)
Land next to Tharston Industrial estate, west of Chequers Lane	GNLP0201	3.90	Mixed use (residential and industrial)
Land to the west of Chequers Road	GNLP0458	0.96	Approx. 20 dwellings with open space
Blyth Green Park, Stratton Road	GNLP0576	1.45	Residential (unspecified number)
Land at Ciudad Rodrigo Farm, Forncett Road	GNLP1050	7.50	Housing with associated access and open space, ranging from 35-100 homes
South of Swan Lane	GNLP3033	5.28	80 dwellings plus 40 bed care home
Total area of land		24.43 ha	

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
Tharston & Hapton			
Land to the west of Tharston Industrial estate	GNLP0272	7.55	Employment

(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														
Long Stratton														
GNLP0509	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
Tharston & Hapton														
GNLP0142	Amber	Green	Amber	Green	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Amber
GNLP0201	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Amber	Green
GNLP0458	Amber	Green	Green	Green	Green	Amber	Green	Green	Green	Green	Amber	Green	Amber	Green
GNLP0576	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green
GNLP1050	Amber	Green	Amber	Green	Amber	Amber	Green	Green	Amber	Amber	Amber	Green	Amber	Green
GNLP3033	Amber	Green	Amber	Green	Green	Amber	Green	Green	Green	Amber	Amber	Green	Amber	Green

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

Site Reference	Comments
Long Stratton	
GNLP0509	<p>General comments: One comment submitted in support of site. On behalf of our client Orbit Homes (2020) Limited we wish to make representations to the Greater Norwich Local Plan (GNLP) 'New, Revised and Small Sites' consultation. These comments are made in light of the fact that no additional sites in Long Stratton were submitted as part of the previous 'Growth Options document and Site Proposals' in early 2018 and in light of our client's ongoing promotion of Land at St Mary's Road, Long Stratton.</p>
Tharston & Hapton	
GNLP0142	<p>General comments: One objection suggested the site is more suitable for commercial development not residential.</p> <p>Tharston and Hapton Parish Council comments: The Infrastructure is very poor and local roads are already being used as rat runs meaning that local residents are against future development till this infrastructure is better and local residents are able to feel safe in their own village. The area also suffers from a problem with speeding due to the lack of infrastructure</p>
GNLP0201	No comments submitted
GNLP0458	<p>General comments: One comment requested road safety improvement if the site would be developed.</p> <p>Tharston and Hapton Parish Council comments: The Infrastructure is very poor and local roads are already being used as rat runs meaning that local residents are against future development till this infrastructure is better and local residents are able to feel safe in their own village. The area also suffers from a problem with speeding due to the lack of infrastructure</p>
GNLP0576	<p>General comments: One comment suggested mixed use may be better for the site.</p>
GNLP1050	<p>General comments: One comment in support of site. However, a junction needs to be improved and new homes would need to be connected to existing settlement by a new footpath.</p> <p>Tharston and Hapton Parish Council comments:</p>

	The Infrastructure is very poor and local roads are already being used as rat runs meaning that local residents are against future development till this infrastructure is better and local residents are able to feel safe in their own village. The area also suffers from a problem with speeding due to the lack of infrastructure.
GNLP3033	No comments, site submitted during Stage B consultation

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.

Long Stratton benefits from a number of core facilities including a high school, library, medical centre and leisure centre, plus a range of other shops, services and community buildings as well as frequent travel to work public transport. These have been the focus around which the settlement has seen steady expansion since the 1960s. To the west of the A140, estate scale development has taken place in four distinct areas, from the 1960s onwards, extending the village into the adjoining parish of Tharston and Hapton. Recent housing development has been focused at Chequers Road, Tharston (120 dwellings at Tharston Meadow) and on land adjoining the district council offices at Swan Lane (50 dwellings and commercial units). Large-scale development to the east of the A140 has been limited to the 370-home Churchfields estate, completed in the early 2000's, alongside a few more recent smaller scale developments. Applications have been submitted covering the major 1800-home allocation promoted through the Area Action Plan. The historic core of the village extends in a linear form along the original Roman road now

forming part of the A140 and is characterised by a townscape of attractive historic buildings. It has Conservation Area status.

Seven sites have been submitted for consideration for potential allocation for housing and/or mixed uses in the GNLP; one within Long Stratton itself to the south of St Mary's Road (GNLP0509, subject to a refused application currently at appeal at the time of writing) and the remaining six in Tharston and Hapton parish on the western edge of the Long Stratton built up area, located to the west of Chequers Road adjoining and around Chequers Road industrial estate; one to the south of Swan Lane adjoining Tharston Meadow housing development.

Sites considered as reasonable alternatives are:

Site GNLP0509

Site GNLP0509 south of St Mary's Road is subject to an active proposal for 52 homes and open space which has been refused planning permission against officer recommendation and is at appeal (ref 2017/0810) at the time of writing. At a strategic level the site is suitable to accommodate some development as it has good access to services and facilities with a safe route to school available. Assessment through the HELAA did not highlight any notable constraints or impacts preventing development albeit that the decision to refuse permission refers to encroachment into open countryside, loss of a significant tree and a poorly integrated design. It is noted that the portion of the site extending into open countryside to the west would remain as open space under the submitted proposals.

On that basis (and allowing for potential design improvements and limiting housing numbers to a figure comparable with the submitted scheme) it is considered that the site could not reasonably be excluded as unsuitable in principle, given that the strategy promotes Long Stratton as having further capacity for growth. Site GNLP0509 is consequently proposed as a reasonable alternative.

Site GNLP0201

Site GNLP0201 presents the best opportunity of the sites along Chequers Road for development and is considered to a reasonable alternative for mixed use development with some local employment. A wholly residential scheme in this location is less favoured but a smaller element of housing within a mixed use scheme could be acceptable.

Site GNLP3033

Site GNLP3033 is considered to be a reasonable alternative, since it is on a bus route, highly accessible to the school (150m away), the council offices and a range of local services and facilities. It would be able to deliver a safe route to school and is particularly well related to the form and character of existing settlement, representing a "rounding off" complementary to existing housing development at Tharston Meadow ongoing immediately to the south.

Sites not considered to be reasonable alternatives are:

Sites GNLP1050 and GNLP0458

Sites GNLP1050 at Ciudad Rodrigo Farm and GNLP0458 to the west of Chequers Road are not considered to be reasonable alternatives. They would require significant road infrastructure, junction and highway improvements and footpaths to deliver a safe route to school, both would have potentially harmful impacts on adjacent heritage assets (adjoining Chequers Farm and Spreadingoak Farm) and the development of larger site GNLP1050 for up to 100 homes would inevitably involve a major intrusion into the rural gap with landscape and ecological impacts. Site GNLP0458 is subject to a high risk of surface water flooding across a large part of the site which may be difficult to mitigate.

Sites GNLP0142 and GNLP0576

Of the sites further south along Chequers Road, GNLP0142 and GNLP0576 south of the industrial estate are relatively accessible to services and facilities but slightly more remote, less well related to the built form of Long Stratton and afford less opportunity to deliver a safe route to school, with site GNLP0142 extending some distance into open countryside west of the employment area and into Wacton parish. These sites are considered to be out of scale with the form of settlement and not particularly compatible with adjoining existing and proposed commercial uses and are therefore not listed as reasonable alternatives.

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
Long Stratton			
Land south of St Mary's Road	GNLP0509	3.60	60-100 dwellings with associated open space
Tharston & Hapton			
Land next to Tharston Industrial estate, west of Chequers Lane	GNLP0201	3.90	Mixed use (residential and industrial)
South of Swan Lane	GNLP3033	5.28	80 dwellings plus 40 bed care home
Total area of land		12.78 ha	

STAGE 6 – DETAILED SITE ASSESSMENTS OF REASONABLE ALTERNATIVE SITES

Site Reference:	GNLP0201
Address:	Land next to Tharston Industrial estate, west of Chequers Lane
Proposal:	Mixed use (residential and industrial)

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
Amber Constraints in HELAA Access, Utilities Capacity, Historic Environment and Transport & Roads.
HELAA Conclusion The site is to the north of the existing industrial estate on Chequers Road and is promoted for a mix of residential and industrial uses. The site is on the periphery of Long Stratton but has access to a range of services however the routes are indirect. Constraints on the site are waste water treatment capacity, access, footpath links, road network, the setting of listed buildings and the proximity to two Sites of Specific Scientific Interests. The scale of the site is such that the waste Water Treatment capacity, access and local road network constraints have, based on current evidence, the potential to be overcome through development. The impacts on SSSIs and listed buildings are not considered detrimental given the context of existing development. The site is concluded as suitable for the land availability assessment.

FURTHER COMMENTS
Highway No. Earlier comment – No- Network capacity
Development Management No site-specific comments. DM officers recommend that due to the planned growth in Long Stratton through the existing allocation, the areas of 'white land' currently encompassed within this application should be considered for the purposes of allocation at this time. If an additional site is required St Mary's Rd is the reasonable option however due to the outstanding Appeal this is a politically sensitive site. The Swan Lane site is considered to be too constrained for development and we are concerned that residential development adjacent to the existing Tharston Industrial Estate would constrain future growth of this commercial site. 4 dwellings have been approved in LS since March 2018
Minerals & Waste

No safeguarded mineral resources

Lead Local Flood Authority

No comments

PLANNING HISTORY:

1970's refusal for residential development

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

No additional documents submitted to support this proposal.

Site Reference:	GNLP0509
Address:	Land at St Mary's Road
Proposal:	60-100 dwellings with associated open space

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Lower quality agricultural land	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
Amber Constraints in HELAA None
HELAA Conclusion This is a greenfield site on the south western edge of the village. It is accessible to a full range of core services in Long Stratton. There is no utilities infrastructure on site affecting development and no known issues in relation to contamination/ground stability or flood risk. Off-site mains reinforcement, enhancement to water treatment capacity and sewerage infrastructure upgrades may be required to serve growth in this location. There are no nationally or locally protected landscapes, natural sites or species in the immediate vicinity of the site and development would not result in the loss of any locally protected open space or high quality agricultural land. There are no significant concerns in relation to impacts on the historic environment, but the scale of development may have some townscape impact. Initial highway evidence has indicated that potential access constraints could be overcome through development and that any impact on the functioning of local roads could be mitigated. A number of constraints are identified but subject to these being overcome the site is considered suitable for the land availability assessment.

FURTHER COMMENTS
Highways Yes. Subject to provision of footway at south side of Flowerpot Lane between St Mary's Road and Manor Road.
Development Management No site-specific comments. DM officers recommend that due to the planned growth in Long Stratton through the existing allocation, the areas of 'white land' currently encompassed within this application should be considered for the purposes of allocation at this time. If an additional site is required St Mary's Rd is the reasonable option however due to the outstanding Appeal this is a politically sensitive site. The Swan Lane site is considered to be too constrained for development and we are concerned that residential development adjacent to the existing Tharston Industrial Estate would constrain future growth of this commercial site. 4 dwellings have been approved in LS since March 2018
Minerals & Waste

No safeguarded mineral resources

Lead Local Flood Authority

No comments

PLANNING HISTORY:

Current planning application subject to appeal (2017/0810)

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

- Sketch layout Plan

Site Reference:	GNLP3033
Address:	South of Swan Lane
Proposal:	80 dwellings plus 40 bed care home

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA

Amber Constraints in HELAA

Site access, Utilities Capacity, Flood Risk, Biodiversity & Geodiversity, Historic Environment and Transport & Roads.

HELAA Conclusion

This is a site of 5.28 ha located to the south of Swan Lane and immediately to the north of a 120 dwelling site, which is under construction, off Chequers Road (Tharston Meadow). It would form a northern extension to that scheme and is promoted for 80 dwellings and a care home. An existing care home and surgery adjoins its south eastern boundary. Initial highway advice has not raised concerns regarding access or impact on the local road network but advises that the site should be viewed in the context of development already committed in Long Stratton. The site is accessible to a range of core services in Long Stratton and is on a bus route; the nearest school is around 150 metres away and whilst there is no footpath access at present, it could be provided. There are no known constraints in relation to contamination/ground stability or utilities infrastructure. A low lying narrow tract of land running diagonally across the site from its northeast corner is prone to surface water flooding and this would need to be addressed through design (e.g. open space provision, water features and Sustainable Drainage Systems), as has been implemented in the adjacent development. There is a public footpath across the site from north to south which should be retained; there are no known significant impacts on other ecological sites or important landscapes. There could be some limited impact on the setting of the listed Spreadingoaks Farm to the west. Subject to addressing identified constraints, the site is considered suitable for the land availability assessment.

FURTHER COMMENTS

Highways

No, network concern at A140/Swan Lane

Development Management

No site-specific comments. DM officers recommend that due to the planned growth in Long Stratton through the existing allocation, the areas of 'white land' currently encompassed within this application should be considered for the purposes of allocation at this time. If an additional site is required St Mary's Rd is the reasonable option however due to the outstanding Appeal this is a politically sensitive site. The Swan Lane site is considered to be too constrained for

development and we are concerned that residential development adjacent to the existing Tharston Industrial Estate would constrain future growth of this commercial site. 4 dwellings have been approved in LS since March 2018

Minerals & Waste

The site is within the consultation area of a safeguarded water recycling centre. 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 consultation with the Mineral and Waste Planning Authority.

Lead Local Flood Authority

No comments

PLANNING HISTORY:

No recent planning history - 1970's refusal for residential use on western section of the site

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.

Three reasonable alternative sites have been identified in Long Stratton at Stage 5 of this booklet. 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 development. 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 6 above.

Long Stratton is considered to be transitioning from Key Service Centre to Main Town and the ‘Towards a Strategy’ document identifies a requirement for 900 – 1000+ dwellings across this sector of the hierarchy. Through further discussion the scale of planned but as yet undeveloped homes in the town is considered significant. In order to allow permitted housing sites in Long Stratton to be developed and existing service capacity to be clarified, there will be no new allocations in the Greater Norwich Local Plan. There is considered to be no reasonable alternative to this approach.

Sites GNLP0142, GNLP0201, GNLP0458, GNLP0509, GNLP0576, GNLP1050, GNLP3033, have been dismissed on highway and landscape grounds, as well as relation to the existing built form and ability to provide a safe route to school.

In conclusion, there are no new sites identified as preferred options in Long Stratton. There are no carried forward allocations but a total of 1,892 additional dwellings with planning permission. This gives a total deliverable housing commitment for Long Stratton & part of Tharston & Hapton of 1,892 homes between 2018 – 2038.

Preferred Sites:

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Long Stratton (including part of Tharston)				
NO PREFERRED SITES DUE TO THE SCALE OF EXISTING COMMITMENT				

Reasonable Alternative Sites:

Address	Site Reference	Area (ha)	Proposal	Reason for not allocating
Long Stratton (including part of Tharston)				
NO REASONABLE ALTERNATIVE SITES				

Unreasonable Sites:

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
Long Stratton (including part of Tharston)				
Land west of Chequers Road, Tharston and Hapton	GNL0142	1.74	Residential (unspecified number)	This site is relatively accessible to services and facilities but is less well related to the built form of Long Stratton and affords less opportunity to deliver a safe walking route to school than other sites put forward. The site is not considered to be suitable for allocation as it extends some distance into open countryside, out of scale with the form of the settlement and residential development in this location would not be particularly compatible with adjoining existing and proposed commercial uses. The existing level of commitment in Long Stratton through the Area Action Plan is high, limiting the need for additional sites.
Land next to Tharston Industrial Estate, west of Chequers Lane, Tharston and Hapton	GNL0201	3.90	Mixed use (residential and industrial)	This site is not considered to be suitable for allocation due to highway concerns over network capacity. The existing level of commitment in Long Stratton through the Area Action Plan is high, limiting the need for additional sites.
Land to the west of Chequers Road, Tharston and Hapton	GNL0458	0.96	Approx. 20 dwellings with open space	This site is not considered to be suitable for allocation as it would require significant road infrastructure, junction and highways improvements and as well as new footways to deliver a safe walking route to school. The site is also subject to a high risk of surface water flooding across a large part of the site which may be difficult to

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				mitigate. The existing level of commitment in Long Stratton through the Area Action Plan is high, limiting the need for additional sites.
Land south of St Mary's Road, Long Stratton	GNLP0509	3.60	60-100 dwellings with associated open space	This site is not considered to be suitable for allocation as a planning refusal for 52 homes and open space was recently upheld at appeal. The existing level of commitment in Long Stratton through the Area Action Plan is high, limiting the need for additional sites.
Blyth Green Park, Stratton Road, Tharston and Hapton	GNLP0576	1.45	Residential (unspecified number)	This site is relatively accessible to services and facilities but less well related to the built form of Long Stratton and affords less opportunity to deliver a safe walking route to school than other sites put forward. Residential development would not be particularly compatible with adjoining existing and proposed commercial uses and therefore the site is not considered to be suitable for allocation. The existing level of commitment in Long Stratton through the Area Action Plan is high, limiting the need for additional sites.
Land at Ciudad Rodrigo Farm, Forncett Road, Tharston and Hapton	GNLP1050	7.50	Housing with associated access and open space, ranging from 35-100 homes	This site is not considered to be suitable for allocation as residential development in this location would be a major intrusion into the rural gap with landscape and ecological impacts. The site would require significant road infrastructure, junction and highways improvements as well as new footways to deliver a safe walking route to school. The existing level of commitment in Long Stratton through the Area

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				Action Plan is high, limiting the need for additional sites.
South of Swan Lane, Tharston and Hapton	GNLP3033	5.28	80 dwellings plus 40 bed care homes	Despite being highly accessible to schools, the council offices and a range of other services and facilities, this site is not considered to be suitable for allocation due to highway issues as there are concerns over the network capacity of the A140 and Swan Lane junction. The existing level of commitment in Long Stratton through the Area Action Plan is high, limiting the need for additional sites.

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

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Long Stratton, No Preferred Sites (General Comments)
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
Rosconn Group	Object	<p>Objects to no allocations proposed in Long Stratton. Currently no deliverable planning permissions within AAP. Additional capacity within the existing allocations but unlikely to be delivered until late in the plan period or beyond. Soundness of plan questioned.</p> <p>RSL request that the land south of Flowerpot Lane,</p>	<ul style="list-style-type: none"> Consider additional information submitted 	Based on the Part 1 Strategy, no new allocations are being made in addition to the Long Stratton Area Action Plan. The Area Action Plan will be reviewed later, separately to the GNLP.	None

		Long Stratton should also be considered in these terms. Further details of site have been submitted including contribution to Stratton bypass			
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0509 Land South of St Mary's Road, Long Stratton (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
Armstrong Rigg Planning	Object	Orbit Homes object to the identification of Land south of St Mary's Road, Long Stratton as an 'unreasonable site'. This conclusion is not justified by the Council's own evidence contained in the Site Assessment Booklet for Long Stratton which demonstrates that the site is the only option for growth in the town that has been consistently assessed as	Reconsider Site Assessment for GNLP0509	Site not to be allocated. Note comment about existing commitment from the Area Action Plan, and its later, separate review to the GNLP.	None Site not to be allocated.

		<p>suitable for development. The reasons for discounting the site are dubious and unsubstantiated and the promoted development would bring significant benefits in terms of the delivery of market and affordable housing and open space. The proposed development is shovel ready and could be delivered in the short term to meet Long Stratton's needs now. In the context of the clear need for additional allocations in the town identified in Orbit Homes' representations to Policies 1 and 7.2, it should be therefore be allocated accordingly.</p>			
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**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
Long Stratton				
South of Flowerpot Lane	GNLP4033	33.79	Whole site, 700 dwellings, community facilities	New Site
South of Flowerpot Lane	GNLP4034	7.48	Northern site, 150 dwellings, open space	New Site
TOTAL		41.27		

STAGE 2 – HELAA COMPARISON TABLE

	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														
Long Stratton														
GNL4033	Amber	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Amber	Green	Amber	Green
GNL4034	Amber	Green	Green	Green	Green	Green	Green	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.

Long Stratton

South of Flowerpot Lane, GNLP4033, 33.79 ha, Whole site, 700 dwellings, community facilities

At a strategic level GNLP4033 is suitable to accommodate some development as it is at the built edge of Long Stratton, and local facilities are within an accessible walking distance. Neither are there physical constraints about the site that makes the principle of development unfeasible. There are though constraints to do with the highways network, as well as townscape and landscape considerations and comments will be needed from internal consultees. There is too the matter of the existing Long Stratton Area Action Plan and that the GNLP Draft Strategy consulted upon in January 2020 took the approach of no new allocations in Long Stratton due to the existing commitment of 1,892 homes. GNLP4033 is though considered a reasonable alternative. On the basis that development cannot be ruled out on principle, so further assessment of GNLP4033 is justified.

South of Flowerpot Lane, GNLP4034, 7.48 ha, Northern site, 150 dwellings, open space

At a strategic level GNLP4034 is suitable to accommodate some development as it is at the built edge of Long Stratton, and local facilities are within an accessible walking distance. Neither are there physical constraints about the site that makes the principle of development unfeasible. There are though constraints to do with the highways network, as well as townscape and landscape considerations and comments will be needed from internal consultees. There is too the matter of the existing Long Stratton Area Action Plan and that the GNLP Draft Strategy consulted upon in January 2020 took the approach of no new allocations in Long Stratton due to the existing commitment of 1,892 homes. GNLP4034 is though considered a reasonable alternative. On the basis that development cannot be ruled out on principle, further assessment of GNLP4034 is justified.

STAGE 5 – SHORTLIST OF REASONABLE ALTERNATIVE NEW & REVISED 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
Long Stratton			
South of Flowerpot Lane	GNLP4033	33.79	Whole site, 700 dwellings, community facilities
South of Flowerpot Lane	GNLP4034	7.48	Northern site, 150 dwellings, open space
TOTAL		41.27	

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

Site Reference:	GNLP4033
Address:	South of Flowerpot Lane, Long Stratton
Proposal:	Whole site, 700 dwellings, community facilities

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA:
<p>Amber Constraints in HELAA Site access, Significant landscapes, Historic environment, Transport & Roads</p>
<p>HELAA Conclusion: This is an area of land promoted for residential development to the south of Long Stratton, and on the western side of the A140. Two options are given for development. GNLP4033 is the whole site, measuring 33.79 ha, proposed for 700 dwellings, community facilities, public open space, landscaping and associated infrastructure. GNLP4034 is the northern portion of the site, measuring 7.48 ha, proposed for 150 dwellings, public open space, landscaping and associated infrastructure. It is noted that an adjacent site promoted as GNLP0509, and capable of providing access to GNLP4033/GNLP4034 via St Mary’s Road, was the subject of a planning application for 52 dwellings. Application 2017/0810 on GNLP0509 was refused in September 2018 for amongst other reasons a 5-year land supply being in place (and the decision was upheld on appeal in August 2019). However, other potential access points where GNLP4033/GNLP4034 abuts the highway network include from Alexander Close, Flowerpot Lane, Limetree Avenue, and possibly Ipswich Road (A140). Initial highways evidence raises concern over the suitability of the network at Flowerpot Lane and for traffic signals on the A140. The edge of settlement location means GNLP4033/4034 is accessible to facilities and services in Long Stratton. For example, Manor Field Infant School is approximately 700 metres from the northern edge of the site/s. To the south-east are two Grade II listed buildings, adjacent to the A140, called Poplars Farmhouse and Cherry Tree Farmhouse that will need consideration. Another consideration is the public right of way that follows the western boundary of the site/s. No ecological designations affect GNLP4033/4034 but regard is needed to Tree Preservation Orders at the edges of the site and near potential access points, such as Alexander Close, Flowerpot Lane, and Limetree Avenue. The land is of Grade 3 agricultural value and commands a slightly elevated</p>

position, creating both townscape and landscape considerations. However, there are no significant areas of flood risk, and no known constraints from contamination, ground instability, or potential loss of open space. In conclusion, the site is considered as suitable for the land availability assessment.

FURTHER COMMENTS:

Highways

No further comment

Lead Local Flood Authority

Relative to the large site size, the information provided by the LLFA in this review is very broad. Flood risk varies greatly across the site. There are flow paths present on-site in the larger AEP events. A large proportion of the proposed site is not affected by flood risk. Construction phase management appertaining to the surface water drainage would be crucial for the entire site. We would recommend a more detailed analysis of the site through smaller sub-sections to allow for a more detailed analysis.

Development Management

Rural approach into Long Stratton – could be issues of connectivity with existing settlement – issues with levels.

PLANNING HISTORY:

Not applicable to site specifically – but adjacent 2017/0810: Erection of 52 dwellings with associated car parking and amenity space, roads, public open space, landscaping and vehicular access off St Mary's Road. Appeal decision: dismissed.

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION:

Site submission form, site map and representation

Site Reference:	GNLP4034
Address:	South of Flowerpot Lane, Long Stratton
Proposal:	Northern site, 150 dwellings, open space

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA:
<p>Amber Constraints in HELAA Site access, Significant landscapes, Historic environment</p>
<p>HELAA Conclusion: This is an area of land promoted for residential development to the south of Long Stratton, and on the western side of the A140. Two options are given for development. GNLP4033 is the whole site, measuring 33.79 ha, proposed for 700 dwellings, community facilities, public open space, landscaping and associated infrastructure. GNLP4034 is the northern portion of the site, measuring 7.48 ha, proposed for 150 dwellings, public open space, landscaping and associated infrastructure. It is noted that an adjacent site promoted as GNLP0509, and capable of providing access to GNLP4033/GNLP4034 via St Mary's Road, was the subject of a planning application for 52 dwellings. Application 2017/0810 on GNLP0509 was refused in September 2018 for amongst other reasons a 5-year land supply being in place (and the decision was upheld on appeal in August 2019). However, other potential access points where GNLP4033/GNLP4034 abuts the highway network include from Alexander Close, Flowerpot Lane, Limetree Avenue, and possibly Ipswich Road (A140). Initial highways evidence raises concern over the suitability of the network at Flowerpot Lane and for traffic signals on the A140. The edge of settlement location means GNLP4033/4034 is accessible to facilities and services in Long Stratton. For example, Manor Field Infant School is approximately 700 metres from the northern edge of the site/s. To the south-east are two Grade II listed buildings, adjacent to the A140, called Poplars Farmhouse and Cherry Tree Farmhouse that will need consideration. Another consideration is the public right of way that follows the western boundary of the site/s. No ecological designations affect GNLP4033/4034 but regard is needed to Tree Preservation Orders at the edges of the site and near potential access points, such as Alexander Close, Flowerpot Lane, and Limetree Avenue. The land is of Grade 3 agricultural value and commands a slightly elevated position, creating both townscape and landscape considerations. However, there are no significant areas of flood risk, and no known constraints from</p>

contamination, ground instability, or potential loss of open space. In conclusion, the site is considered as suitable for the land availability assessment.

FURTHER COMMENTS:

Highways

No further comment

Lead Local Flood Authority

Standard information required at a planning stage.

Flood risk on-site is minor and concentrated to the site boundary. Greater depths are very localised.

Development Management

Rural approach into Long Stratton – could be issues of connectivity with existing settlement – issues with levels.

PLANNING HISTORY:

Not applicable to site specifically – but adjacent 2017/0810: Erection of 52 dwellings with associated car parking and amenity space, roads, public open space, landscaping and vehicular access off St Mary's Road. Appeal decision: dismissed.

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION:

Site submission form, site map and representation

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
Long Stratton (including part of Tharston and Hapton parish)				
South of Flowerpot Lane	GNLP4033	33.79	Whole site, 700 dwellings, community facilities	This site is not allocated. Based on the Part 1 Strategy, no new allocations are being made in addition to the Long Stratton Area Action Plan. The Area Action Plan will be reviewed later, separately to the GNLP.
South of Flowerpot Lane	GNLP4034	7.48	Northern site, 150 dwellings, open space	This site is not allocated. Based on the Part 1 Strategy, no new allocations are being made in addition to the Long Stratton Area Action Plan. The Area Action Plan will be reviewed later, separately to the GNLP.

FINAL CONCLUSIONS FOR THE REGULATION 19 VERSION OF THE PLAN

Site assessments prior to the Regulation 18C consultation

Up to the Regulation 18C consultation in January 2020 there were 7 sites in Long Stratton measuring 24.43 hectares, equalling the potential for approximately 610 homes. The outcome of initial site assessment work (which is detailed in part 1 of this booklet) was not to prefer any new sites for allocation. Due to the scale of the existing commitment in Long Stratton, the Part 1 Strategy consulted upon in January 2020 does not make further allocations in addition to Long Stratton's Area Action Plan (AAP).

Summary of comments from the Regulation 18C draft plan consultation

Very few comments were received about the site proposals for Long Stratton. Most likely due to the overriding strategic position of no new allocations in addition to the Area Action Plan. Comments were limited to those objecting the strategic approach and wanting more development land included.

Promoters of GNLP0509 submitted representations focused on the suitability of their site. Their submission included plans for a 52-home scheme accessed from St Mary's Road. The scope of comments extended as well to the evidence supporting the GNLP, and how GNLP0509 is needed to compensate for the stalled delivery of other sites.

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

Two new sites were submitted during the consultation between January and March 2020. Although they are from the same promoter. Giving options for part-development of a site or its whole development.

GNLP4033 is to the south of Long Stratton, west of the A140, located south of Flowerpot Lane, and measures 33.79 ha. Whilst less than optimal the site is considered a reasonable alternative. The land is at the built edge of Long Stratton and local facilities are within an accessible walking distance, but there are highways constraints, as well as townscape and landscape considerations.

GNLP4034 is the northern part of GNLP4033. The site measures 7.48, and could provide approximately 150 dwellings. Like GNLP4033, GNLP4034 is also considered a reasonable alternative. Constraints are the same too, amongst which are highways, townscape and landscape.

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 Long Stratton.

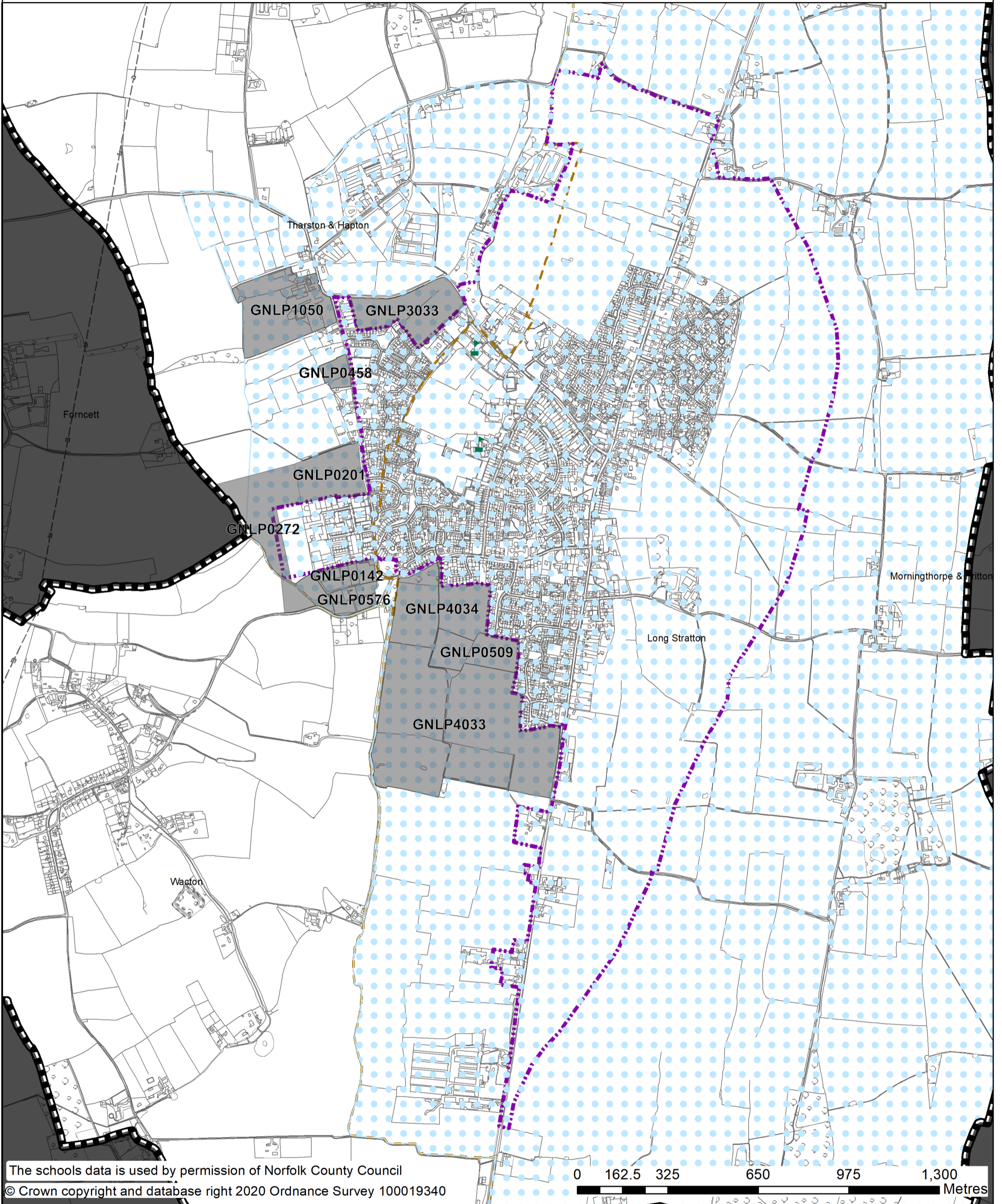
A total of 6 sites were considered (GNLP0201, 0509, 3033, 4033, 4034). Sites in Long Stratton obviously have commonalities. Shown in equal scoring for matters of 'Air Quality and Noise', 'Landscape', 'Deprivation', 'Health', 'Crime', 'Transport and Access to Services', 'Historic Environment', 'Natural Resources', 'Waste and Contaminated Land'.

Based on the Sustainability Appraisal post-mitigation scoring matrix, out of the 15 criteria, sites typically scored 7 to 8 'reds', 1 to 3 'neutrals', and 4 to 5 'greens'. As to major positive scores, 2 sites scored at least 1, and 2 sites scored 2 major positive scores – for criteria of 'Housing', 'Education', and 'Economy'. Issues flagged up by the sustainability appraisal have informed the site selection process, but the context set by the Part 1 Strategy remains a major factor.







Final conclusion on sites for allocation in the Regulation 19 Plan

The consultation feedback received during 2020 has reinforced the understanding that potential options exist for further development in Long Stratton, but that is not the overriding factor. Due to the scale of the existing commitment, the GNLP does not make further allocations in addition to Long Stratton's Area Action Plan. The Part 1 Strategy explains that the commitment is 1,922 homes (including uplift plus delivery 2018/19 and 2019/20).

LONG STRATTON



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-  Primary School
-  Not Allocated
-  Settlement Boundary
-  Primary School Catchment (2018-19)
-  Long Stratton Area Action Plan Boundary
-  Parish Boundary



1:12,500
at A3

Date: 25/11/2020

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