Settlement Name:	Marsham
Settlement Hierarchy:	Marsham forms a village cluster in its own right in the emerging Greater Norwich Local Plan as it has an accessible primary school. The Towards a Strategy document identifies that 2,000 dwellings in total should be provided between all village clusters. In terms of services and facilities there is a primary school, village hall and pub. The current capacity of Marsham Primary School is rated as green which means the settlement has potential capacity for 50-60 new dwellings. However, it is important to know that the High Street which leads to the school is only partly paved in some sections. At the base date of the plan there are no carried forward residential allocations but there is a total of 20 additional dwellings with planning permission on small sites.
	<ul><li>provided between all village clusters. In terms of services and facilities there is a primary school, village hall and pub.</li><li>The current capacity of Marsham Primary School is rated as green which means the settlement has potential capacity for 50-60 new dwellings. However, it is important to know that the High Street which leads to the school is only partly paved in some sections.</li><li>At the base date of the plan there are no carried forward residential allocations but there is a total of 20 additional</li></ul>

## 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
	Marshan	n	
Land to rear of 40-46 High Street	GNLP0171	1.71	Residential (unspecified number) including open space, landscaping & associated infrastructure.
Former Piggeries, Fengate Farm	GNLP0219	1.78	Approx. 25 dwellings
Land North, East, West and South of Marsham	GNLP0229	63.42	Approx. 1,000 dwellings, public open space, community facilities, retail, commercial development and land for school extension if required
Fengate Farm	GNLP0572	0.70	10-12 dwellings

South of Le Neve Road	GNLP2143	1.97	30 dwellings plus extension to cemetery (site part of GNLP0229)
Fengate Farm, Fengate	GNLP3035	3.06	35 dwellings
Total area of land		72.64	

## 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
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

							Categ	ories						
Site	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
Reference						M								
GNLP0171	Amber	Amber	Amber	Green	Green	Green	arsham Amber	Green	Green	Amber	Amber	Green	Amber	Green
GNLP0219	Amber	Amber	Amber	Green	Amber	Green	Amber	Green	Green	Amber	Amber	Green	Amber	Green
GNLP0229	Green	Amber	Amber	Green	Amber	Amber	Amber	Green	Green	Amber	Amber	Amber	Amber	Amber
GNLP0572	Amber	Amber	Amber	Green	Amber	Green	Amber	Green	Green	Amber	Amber	Green	Amber	Green
GNLP2143	Green	Amber	Amber	Green	Green	Green	Amber	Green	Amber	Amber	Green	Green	Green	Green
GNLP3035	Green	Amber	Amber	Amber	Amber	Green	Amber	Green	Green	Amber	Amber	Green	Green	Amber

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

Site Reference	Comments
	Marsham
GNLP0171	No comments submitted
GNLP0219	No comments submitted
GNLP0229	No comments submitted
GNLP0572	No comments submitted
GNLP2143	General comments Objections raised concerning loss of a greenfield site with more favourable brownfield sites available. Concerns regarding loss of heritage and ecological impacts, foot paths, loss of agricultural land and sewerage infrastructure capacity. Marsham Parish Council comments
	The council are opposing the plans and would like to obtain existing settlement limits and not to have infill.
GNLP3035	No comments as 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

The main point of access into the village is off the A140 on to the High Street. The primary school is located reasonably centrally in the village, but there are some gaps in the footpaths near to the school due to the width of the roadway. Elsewhere in the village footpath provision is relatively good.

In total six sites are promoted, including a large 63 ha site (GNLP0229) that wraps around the western and northern sides of the settlement. Three of the sites (GNLP0171, 0219 and 0572) are located to the north of the village and are not considered to be reasonable alternatives due to their poorer access along Fengate and/or Crane's Lane. As well as no footpath provision to the school Fengate and Crane's Lane are in character a single track country lane. GNLP0171 backs onto a permitted scheme for 8 dwellings off the High Street (ref: 20161232), but no vehicular access is available through the proposed development, and so GNLP0171 still relies on access via Fengate and/or Crane's Lane.

The remaining three sites are considered to be reasonable alternatives for further assessment (GNLP0229, 2143, and 3035). The former piggeries site, GNLP3035, benefits from a couple of access points, one of which is from Old Norwich Road. Redevelopment of previously used land is a further factor in the consideration of GNLP3035. GNLP3035 is shortlisted for further consideration but the density of development and extent of developable area will need particular attention. To the south of the village GN2143 has access to Le Neve Road and from here existing footpaths lead back to the High Street and School. GNLP2143 could provide 30 plus dwellings, as well as land for extending the cemetery, and is considered suitable for

further assessment. The 63 ha site GNLP0229 merits further consideration if smaller sections could be brought forward appropriate to the strategic requirement of 50-60 homes. The frontage sections of GNLP0229 on the northern and southern sides of the High Street appear to have the most potential. Access appears possible next to no. 26 The High Street, as well as on the southern and northern sides of the High Street adjacent to Crane's Lane.

## 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
	Marshan	n	
Land North, East, West and South of Marsham	GNLP0229	63.42	Approx. 1,000 dwellings, public open space, community facilities, retail, commercial development and land for school extension if required.
South of Le Neve Road	GNLP2143	1.97	30 dwellings plus extension to cemetery (site part of GNLP0229)
Fengate Farm, Fengate	GNLP3035	3.06	35 dwellings
Total area of land		68.45	

## STAGE 6 – DETAILED SITE ASSESSMENTS OF REASONABLE ALTERNATIVE SITES

Site Reference:	GNLP0229
Address:	Land North East, West and South of Marsham High Street, NR10 5AE
Proposal:	Strategic growth of Marsham to include approx. 1,000 new homes, public open space, community facilities, retail, commercial development and land for school extension if required.

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Mostly farm land with several redundant farmyards that are semi- derelict/unused/vacant.	Greenfield

#### CONSTRAINTS IDENTIFIED IN THE HELAA Amber Constraints in HELAA

Accessibility to services, Utilities Capacity, Contamination & Ground Stability, Flood Risk, Market Attractiveness, Biodiversity and Geodiversity, Historic Environment, Open Space & GI, Transport & Roads and Compatibility with Neighbouring Uses.

## **HELAA** Conclusion

The site is a single submission comprising four extensive parcels of land surrounding Marsham, incorporating sites GNLP0171, GNLP0219 and GNLP0572. Parts of the sites have some accessibility to core services and facilities but the proposal would need to enhance provision to support the level of growth envisaged. There are no known constraints from utilities infrastructure on any site. Areas of the sites incorporate former farm buildings (on the north) and filled ground (on the east) resulting in the potential need for decontamination and site remediation. Relatively small areas of the site are at risk of surface water flooding with parts in flood zones 2 and 3, principally on the eastern parcel. Off-site mains reinforcement, enhanced waste water treatment capacity and sewerage infrastructure upgrades would be required to serve growth in this location and local waste water treatment capacity is known to be very limited. There are no nationally or locally protected landscapes in the immediate vicinity, but some biodiversity interest is indicated with a county wildlife site and ecological corridor adjoining the eastern parcel and protected species in various locations. There are two SSSIs within 3km which would need specific mitigation from this scale of growth. Development would affect locally protected public open space (allotments) to the west of Marsham but would not lead to the loss of high quality agricultural land. There could be significant harmful impact on heritage assets from development and a severely detrimental impact on townscape character from the very

significant scale of growth proposed. Initial highway evidence has indicated that potential access constraints could be overcome through development but that the local road network is unsuitable and that the remoteness of the site to the east of the village would lead to increased car dependency. A number of constraints are identified but subject to being able to overcome these the site is considered suitable for the land availability assessment. A small area of the site (approx. 1%) is subject to an existing planning permission for housing but this would not have any significant impact on the contribution of the site to development capacity.

## FURTHER COMMENTS

#### Highways

No. Development of this scale not appropriate to this location, Aylsham would be better suited. 1000 dwellings with employment & land for school. Would require roundabout junction at A140/High Street junction. Other substantial highway improvements should be expected for a development of this scale. Re-routing of Allison Street may be required to a new junction north of existing at the A140.

### **Development Management**

Reduced site to the south of High Street is potentially acceptable subject to discussions over its size and precise boundaries.

#### **Minerals & Waste**

Underlain or partially by sand and gravel, any future policy matters should include CS16 if allocated

### Lead Local Flood Authority

Few or no Constraints. Standard information required at a planning stage. This allocation comprises 4 separate sites around the village. For ease it is recommended that this allocation is split into separate sites going forward. They are discussed in turn. Southernmost site, RoSFW mapping indicates that the site is not at risk of flooding. There is no mapped connection to a watercourse, sewerage connections may be available from nearby residential area, if not drainage will be reliant on infiltration. Westernmost site RoSFW mapping indicates that the site is not at risk of flooding. There are watercourses within 50m of the site but there are no mapped connections to them, sewerage connections are unlikely, so drainage may be reliant on infiltration. The LLFA have previously been consulted on a planning application for this site, but made no comment. Central Site RoSFW mapping indicates that the site is not at risk of flooding. There is no mapped connection to a watercourse, sewerage connections may be available from nearby residential area, if not drainage will be reliant on infiltration. Minor planning applications have been submitted for part of this site. The LLFA have not commented on them. Easternmost Site Unlike the other parcels, the northern part of this site is at risk from surface water flooding, with a flow path shown on mapping in the 0.1% event and flooding associated with the watercourse on the northern boundary in all return periods. Any planning application should be supported by appropriate fluvial flood modelling to understand the risk posed by ordinary watercourse within the eastern site so that development can take place without increasing risk on or off site. Groundwater flooding should be envisaged

due to several wells being located on the OS map. Surface water runoff for the development, if going to infiltration must take account of any private water supplies.

## PLANNING HISTORY:

Not known

## BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

No additional documents submitted to support this proposal.

Site Reference:	GNLP2143
Address:	South of Le Neve Road
Proposal:	Residential development (30 dwellings proposed) and extension to cemetery

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural	Greenfield

#### CONSTRAINTS IDENTIFIED IN THE HELAA Amber Constraints in HELAA:

### **HELAA** Conclusion

The site lies to the south of Marsham village, south of Croft Lane, it overlays a previously promoted site and is proposed for residential development and extension to the adjacent cemetery. Initial evidence suggests the Highways Authority support the site, and it has access to bus services and Marsham Primary School but is also close to listed buildings including the church. Sewerage infrastructure upgrades would be required to serve growth in this location and local waste water treatment capacity is known to be very limited. There is a SAC and two SSSIs within 3km which may require mitigation. Development would not result in the loss of any locally protected public open space or high quality agricultural land, and there is no known constraint from utilities infrastructure, contamination or flood risk. Subject to the above constraints being mitigated, in principle the site is considered suitable for the land availability assessment. However, as it overlaps site GNLP0229, it will not be counted to avoid duplication and will therefore be marked as unsuitable.

## FURTHER COMMENTS

Highways

Yes. Subject to access via Le Neve Road.

## **Development Management**

Likely ok from landscape perspective. Need Heritage Officer view on impact of setting of church.

## Minerals & Waste

Partially underlain by sand and gravel, policy matters should include CS16

## Lead Local Flood Authority

Few or no constraints, standard information required at a planning stage. No risk of surface water flooding. External flooding northwest of site boundary and south east of site boundary. No watercourses on or near site. No surface water sewer systems on or near site. Not a source protection zone. Site has superficial deposits of sand and gravel.

# PLANNING HISTORY: No known history

## BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

No additional documents submitted to support this proposal.

Site Reference:	GNLP3035
Address:	Fengate Farm, Fengate
Proposal:	35 dwellings

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Vacant poultry units.	Brownfield

## CONSTRAINTS IDENTIFIED IN THE HELAA

### Amber Constraints in HELAA

Access to services, Utilities Capacity, Utilities Infrastructure, contamination / ground stability, Market attractiveness, biodiversity & geodiversity, historic environment and compatibility with neighbouring uses.

## **HELAA** Conclusion

This is a 3 ha site previously used as a poultry unit. That use ceased in 2011 and it's now vacant but a number of disused buildings from the former business remain on the site. The proposal is for residential development and it is located adjacent to the settlement limit. Initial Highways comments indicate that no access of could be achieved of Fengate However, access off old Norwich Road subject to highway improvements could be an option. In addition, the site is within walking distance to Marsham Primary School, although the High Street is not paved throughout, also bus stop, village hall and local PH nearby. There are no insurmountable topographical issues affecting the site and the land is grade 3 agricultural land. Aylsham STW has no spare capacity and the local sewerage network is almost at capacity. There are no surface water sewers in Marsham. It will require enhancement to the WRC treatment capacity. In terms of Biodiversity, the Norfolk Valley Fens SAC/Buxton Heath SSSI and Cawston and Marsham Heaths SSSI are within 3km, a CWS approx. 350m to the east. Bolwick Hall and its garden house and stable block, approx. 270 m to the north east. In conclusion, the site is considered suitable for the land availability assessment.

## FURTHER COMMENTS

### Highways

No. Not acceptable. 35 dwellings. Fengate Lane is not of a sufficient standard to accommodate development traffic – narrow with no footway. Junction with A140 has a safety concern. Access achievable via Norwich Road but footway connection to school not continuous, not possible to improve appropriately within the constraints of the highway.

## **Development Management**

Site has recent history of refusals for similar scale of development in part in principle but also due to issues of access, visual impact, residential amenity due to contours of site and unsuitable location for scale of development (unsustainable). For these reasons the proposal is not considered suitable for further consideration.

## Minerals & Waste

No comments

### Lead Local Flood Authority

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

## PLANNING HISTORY:

#### 20131533

(36 dwellings) refused and dismissed at appeal. 20150802 (20 dwellings) refused.

## BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

No additional documents submitted to support this proposal.

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

Three reasonable alternative sites have been identified in the Marsham cluster at stage five. 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 site GNLP2143 was the most appropriate one for allocation, (including extension to the cemetery if appropriate) as it is the only site with adequate vehicular access. However, it is only considered suitable for 25-35 dwellings due to the need to respect the setting of the adjacent Grade I listed church, so will not wholly met the capacity identified for the cluster. Sites GNLP0229 and GNLP3035 were not favoured for allocation, primarily on highway grounds.

In conclusion, one site is identified as a preferred option, providing for between 25-35 new homes in the cluster. There are no carried forward residential allocations but there is a total of 20 additional dwellings with planning permission on small sites. This gives a total deliverable housing commitment for the cluster of between 45-55 homes between 2018 – 2038.

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Marsham				
South of Le Neve Road	GNLP2143	1.97	25 - 35 dwellings (and extension to cemetery)	This is the only site considered suitable for allocation in Marsham. It is allocated subject to vehicular access via Le Neve Road. Development will need to respect the setting of the adjacent Grade I listed church and provide an extension to the cemetery if required.

## **Preferred Sites:**

## **Reasonable Alternative Sites:**

Address	Site Reference		Promoted for	Comments				
Marsham	Marsham							
NO REASONABLE ALTERNATIVE SITES								

## Unreasonable Sites:

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
Marsham				
Land to rear of 40-46 High Street	GNLP0171	1.71	Residential (unspecified number) including open space, landscaping & associated infrastructure	This site is located to the north of the village, with poor access along Fengate and/or Cranes Lane, which are single track country lanes with no footway provision to Marsham Primary School 250m. The site does back onto a permitted scheme for 8 dwellings off the High Street but there is no vehicular access available through this scheme.
Former Piggeries, Fengate Farm	GNLP0219	1.78	Approx. 25 dwellings	This site is located to the north of the village, with poor access along Fengate and/or Cranes Lane, which are single track country lanes with no footway provision to Marsham Primary School.
Land North, East, West and South of Marsham	GNLP0229	63.42	Approx. 1000 dwellings, public open space, community facilities, retail, commercial development land for school extension if required	This is a very large development proposal which if developed in its entirety would be out of keeping with the form and character of Marsham and would total far more dwellings than is sought in the village cluster. Consideration has been given to whether smaller sections of the larger site could be brought forward and the frontage sections on the north and south side of the High Street would seem to have the most potential.

Address	Site	Area	Promoted for	Reason considered
	Reference	(ha)		to be unreasonable
				After careful consideration none of the site is thought to be reasonable for allocation due to highway constraints on The Street and the fact that all traffic from the development would have to travel via The Street to access the A140.
Fengate Farm	GNLP0572	0.70	10-12 dwellings	This site is located to the north of the village, with poor access along Fengate and/or Cranes Lane, which are single track country lanes with no footpath provision to Marsham Primary School.
Fengate Farm, Fengate	GNLP3035	3.06	35 dwellings	This former piggeries site is well located in relation to the form and character of the settlement and was considered to be worthy of further investigation due to the benefits of redeveloping previously used land rather than a greenfield site. However, after careful consideration it is considered unreasonable for allocation as there has been a history of planning refusals in terms of access, visual impact and residential amenity. The site is not acceptable in highway terms as Fengate Lane is not of a sufficient standard to

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				accommodate development traffic and the junction with the A140 poses a safety concern. The footway connection to Marsham Primary School is not continuous and it is not possible to improve this within the constraints of the highway.

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

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2143 Land South of Le Neve Road, Marsham (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	12
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 8 Object, 3 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Bidwells on behalf of client	Support	Support preferred allocation of GNLP2143. Land is in single ownership and available immediately. Further land is available if required. Upper limit of density for 25-35 dwellings is lower than the min. 25dph suggested in Policy 2 so site could accommodate at least 35 dwellings. Masterplan shows how land immediately adjacent to the existing cemetery could be used as an extension to the cemetery designed to mitigate visual impact on nearby heritage assets. Development has been designed around existing public right	Ensure densities across all sites are in line with Policy 2	Support for site noted. Densities have been re- looked at across the plan as a whole to ensure they are in line with the minimum requirements of Policy 2. It is proposed to allocate the site for 35 dwellings, which reflects its sensitive location and need for	Remove reference to a range and allocate site for 35 dwellings

Carter Jonas on	Object	of way and a landscape strategy would be submitted with any planning application. An access appraisal has been prepared and submitted with the representation showing safe access from Le Neve Road and safeguarding the public right of way from the south east corner of the site. A new junction with Croft Lane (private road) will be required.	Get highway view on access appraisal	careful design and adequate landscaping to minimise visual impact on the setting of the church to the east. The policy does state that more homes may be accommodate subject to an acceptable design and layout. The highway authority have looked at the access appraisal submitted and are happy subject to access via Le Neve Road, a walking to school assessment and implementation of any agreed measures. Site GNLP2143	None
behalf of Noble	Object	Questioning/comparing HELAA assessment of site suggesting that site GNLP3035 is	assessment for both	was only	INOTIE
Foods Ltd		more preferable for allocation. Question	sites GNLP2143 and	considered to be	
		why GNLP2143 was considered to be	GNLP3035 (including	unreasonable in	

unreasonable in HELAA yet preferred for	HELAA) in the context	the HELAA to
allocation.	of this submission	avoid double
		counting because
Sustainability Appraisal identified site as	Further SA work will	it overlapped with
having minor negative impact on landscape	be undertaken	site GNLP0229
and major negative impact on heritage		which had already
		been assessed as
Further work needed to look at impact on	Consider further	suitable. The
heritage assets and landscape, particularly	investigation of	conclusion for
setting of Grade 1 Listed Church of All	landscape and	GNLP2143 states
Saints and wider setting of the village.	heritage impacts	that in principle
		the site is
Why develop a greenfield site when there		considered to be
are brownfield sites available in the village?		suitable.
		Suitable.
		The Sustainability
		Appraisal did
		identify
		GNLP02143 as
		having a minor
		negative impact
		on landscape and
		major negative
		impact on
		heritage, however
		after careful
		consideration and
		site assessment
		GNLP2143 was
		considered to be
		the best site for
		allocation in the

				village and the selection process is clearly set out in the Marsham assessment booklet. It is considered that the potential heritage impacts can be mitigated through a well designed development and landscaping to the east of the site. The policy will also recognise that a Heritage Impact Assessment will be required.	
Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design. Also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Sue Catchpole, District Councillor for Aylsham	Comment	Support Marsham Parish Council view that there is no need to build outside originally designated area, especially after fire on old Chicken Farm, this site should be	Relook at Old Chicken Farm (Site GNLP3035) in the light	Comments noted	None

		developed first. Green space is important and should be included within any development.	of consultation comments received.		
Environment Agency – Eastern Region	Comment	There is not enough capacity in current permit at Aylsham WRC to accommodate this development and there are no plans for capacity upgrades in terms of flow in PR19. There are only plans to increase storage at intermittent CSOs. Development at this site will require phasing in line with upgrades to WRC and we will expect to see evidence of liaison with Anglian Water Services regarding this.	Further consideration of water capacity, in liaison with Environment Agency and Anglian Water	Noted	Add policy requirement and supporting text to reference that development will need phasing in line with upgrades to the Aylsham Water Recycling Centre with evidence of liaison with Anglian Water.
Historic England	Object	Sensitive site in terms of the potential impact upon multiple heritage assets, some of which are highly graded. We therefore have some concerns about the allocation of this site. Whilst there are no designated heritage assets within the site boundary, there are a number of listed buildings to the east of the site including the grade I listed Church of All Saints and the grade II listed Old Rectory, Colenso Cottage and Marsham War Memorial. Suggest a more detailed Heritage Impact Assessment be undertaken to assess the impact of the proposed development upon the significance of these heritage assets, to	Consider need for more detailed Heritage Impact Assessment with concept diagram showing proposed mitigation.	It is accepted that the policy should acknowledge the potential for harm to the heritage assets and the requirement for measures to address this including a Heritage Impact Assessment	Amend existing policy requirement to read: 'Any development must conserve and enhance the significance of the grade I listed Church of All Saints, the grade II listed Old Rectory, Colenso Cottage and the Marsham War Memorial to the east of the site,

Members of the	Object	<ul> <li>establish the suitability or otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable. If the site is found suitable, the findings of the HIA should then inform the policy wording.</li> <li>It might also be helpful to illustrate proposed mitigation in the form of a concept diagram for the site e.g. showing where open space and landscaping would be located.</li> <li>Various concerns raised including:</li> </ul>			including any contribution made to that significance by setting. This includes but is not limited to landscaping to the east of the site and a concept diagram showing where open space and landscaping would be located. Due to the sensitivities of this site a Heritage Impact Assessment will be required. Amend policy in
public – various		<ul> <li>Traffic/accessibility</li> <li>Highway access insufficient for contractors and residents. Current residents on Le Neve Road will experience a significant period of disruption.</li> <li>The junction with The Street and the A140 is difficult and dangerous.</li> <li>Le Neve Road and Wathen Way are narrow residential roads with parking on both sides and increased volume of traffic</li> </ul>	Promoters have submitted an access appraisal which will need to be considered by NCC highways	The highway authority have looked at the access appraisal submitted and are happy subject to access via Le Neve Road, a walking to school assessment and implementation of	line with recommendations from Historic England

	would be departous for pedastrians using		any agreed	
	would be dangerous for pedestrians using		any agreed	
	these roads.		measures.	
	Heritage/landscape			
	• Site would represent a clear breakout into	Consider need for		
	open countryside outside development	more detailed Heritage	The heritage	
	boundary. Other smaller sites would	Impact Assessment	sensitivities of the	
	integrate more successfully with existing	with concept diagram	site are	
	form (such as GNLP0171).	showing proposed	recognised and	
	<ul> <li>Impact/harm to the setting of Grade I</li> </ul>	mitigation.	amendments are	
	Parish Church. New landscaping will not		recommended to	
	mitigate this in the short or medium term.		the policy based	
	Church will be enshrouded by a modern		on comments from	
	housing estate		Historic England	
	• The site is a recognised historic Word	Investigate historic	including the need	
	War 1 landing strip which would be lost	importance and	to undertake a	
	forever if the site is built on.	implications of Word	Heritage Impact	
	<ul> <li>Site of archaeological interest</li> </ul>	War 1 landing strip	Assessment	
	<ul> <li>Important for wildlife. Hares, farmland</li> </ul>	5 1		
	birds, smooth snake and hedgerow bird			
	species			
	Other			
	• Village has few facilities other than the			
	school. Modest infill development may be			
	appropriate but a large allocation would			
	harm the character and setting of the			
	village.			
	<ul> <li>Allocation suggests 25-35 homes but</li> </ul>			
	accepts more could be accommodated.			
	Fear that up to 60 dwellings could come			
	forward. Site forms part of a much larger			
	site and promoter could push for further			
	growth.			
<u> </u>		1	1	

animals. Dust clouds and insects in abundance from the field
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP3035 Fengate Farm, Fengate, Marsham
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 2 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
Carter Jonas LLP on behalf of Noble Foods Ltd	Object	The findings of the site assessments for some of the preferred allocations and reasonable alternative are not robust or credible, including those in Marsham. We have reassessed the findings for sites in Marsham, attached to our representations. Site GNLP3035 contains vacant and unused buildings and areas of hardstanding associated with former poultry farm. Buildings recently damaged by fire and are due to be demolished. Site not likely to be reused for agricultural purposes.	Relook at site assessment for both sites GNLP3035 and GNLP2143 (including HELAA) in the context of this submission	The previously developed nature of the site is recognised but concerns still remain about vehicular access to the site and pedestrian connectivity to the school. Fengate Lane is not of a sufficient standard to accommodate development traffic and the	None
		Main access to development would be	Need further	junction with the	
		from Old Norwich Road and the access	information from NCC	A140 poses a	

		from Fengate would be used as a secondary/emergency access. Planning application for 36 dwellings submitted in 2013 was refused and dismissed at appeal. As number of dwellings exceed limit for service villages at the time. Some concern raised about proposed design and layout but no concerns about a vehicular access off Old Norwich Road. A contamination assessment would be needed because of previous uses on the site. Existing trees and hedgerows would be retained and a substantial landscape buffer provided. There would be a mix of housing including affordable. It is considered that the findings of the Sustainability Appraisal for landscape and heritage are incorrect and should be revised. Request that the site should be allocated for residential development of 35 dwellings in the GNLP.	Highways regarding suitability of site access. Look at highway comments made to refused planning application on this site	safety concern regarding the intensification of traffic accessing onto a corridor of movement. A Transport Statement dated July has been provided. Further discussions have taken place with the highway authority who have commented that the 2013 planning application was subject to a highway holding objection that was not resolved. A subsequent application in 2015 was refused partly due to lack of	
				highway information.	
Member of the public	Object	<ul> <li>Object to the site being unreasonable for the following reasons:</li> <li>Two points of access to the site from Fengate and the Old Norwich Road</li> </ul>		See above	None

<ul> <li>will naturally split traffic rather than forcing all traffic onto one road as would be the case with the preferred site.</li> <li>Access from Old Norwich Road should be able to support construction traffic without using Fengate.</li> <li>Site is brownfield and therefore will not destroy more greenfield sites as would be the case with the preferred site.</li> <li>Owner of site has already applied for planning permission so reasonable to assume they would like it to be built on</li> </ul>	
<ul> <li>Site should be big enough for 35 houses so would satisfy the requirement for housing without increasing the footprint of the village.</li> </ul>	

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

No new and revised sites

## FINAL CONCLUSIONS FOR THE REGULATION 19 VERSION OF THE PLAN

## Site assessments prior to the Regulation 18C consultation

Up to the Regulation 18C consultation there were 6 sites promoted for residential/mixed use totalling around 73 hectares of land in the Marsham cluster. The outcome of the initial site assessment work (which is detailed in part 1 of this booklet) was to prefer site GNLP2143 for 25-35 dwellings with an extension to the cemetery. This preferred site was favoured over other sites promoted in the cluster because it was the only one with adequate vehicular access and was consulted on as part of the Regulation 18C draft plan consultation. It is recognised that the site has historic environment sensitivities but it is through that these can be overcome through policy mitigations

### Summary of comments from the Regulation 18C draft plan consultation

Through the Regulation 18C consultation a number of comments were received regarding sites in the Marsham cluster. The main issues raised were historic environment concerns regarding the preferred site (detailed in part 2 above). These comments have resulted in the policy wording being strengthened to refer to the need for an Historic Impact Assessment but did not result in any changes to the selection of the site preferred for allocation. Site GNLP3035 was proposed an alternative/additional site for allocation. This was given due consideration and although the previously developed nature of the site is recognised concerns still remain about vehicular access to the site and pedestrian connectivity to the school. In particular the junction with the A140 poses a safety concern regarding the intensification of traffic accessing onto a corridor of movement.

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

No new and revised sites

## 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 Marsham cluster. Three sites were subject to SA, of the three GNLP0229 scored multiple double negatives indicating that it would not be a good site for allocation.

The preferred site GNLP2143 scored negatively for health and the historic environment due the proximity of the grade I listed church but it is felt that mitigation could be written into the policy. Site GNLP3035 scored slightly better through the SA with only a double negative score for health but it is felt that the highway concerns identified through the site assessment process are difficult to overcome.

## 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 the Marsham cluster is to allocate site GNLP2143 for 35 dwellings plus cemetery extension (the range of dwellings in villages was dropped after the Regulation 18C consultation). Other sites are rejected for allocation primarily due to highway grounds.

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.

