

Hierarchy	KEY SERVICE CENTRES
Settlements:	Acle, Blofield, Brundall, Hingham, Loddon/Chedgrave, Poringland/Framingham Earl, Reepham, Wroxham

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

STAGE 1 – LIST OF SITES PROMOTED IN THE SETTLEMENT

LIST OF SITES TO BE CONSIDERED FOR COMMERCIAL/EMPLOYMENT

Address	Site Reference	Area (ha)	Proposal
Park Farm, Bungay Road, Bixley (Poringland)	GNLP0323	9.83	Employment & Commercial use
Land to the south of the A146, Loddon	GNLP0347	3.41	Storage and distribution hub
Land south A1042 Yarmouth Road. Postwick (Brundall)	GNLP0371	3.08	Commercial
Land north of Norwich Road (Hethersett)	GNLP0486	14.83	Employment
Little Melton Business Park - Site A (land to west) (Hethersett)	GNLP1023-A	2.90	Food-led industrial
Little Melton Business Park - Site B (land to east) (Hethersett)	GNLP1023-B	10.70	Food-led industrial
Land adjacent Postwick Interchange, Postwick with Witton	GNLP3029	3.12	Mixed use including leisure, roadside, retail
Land North of Yarmouth Road, Brundall	GNLP3049	1.71	Employment
Total area of land		49.58	

**LIST OF SITES TO BE CONSIDERED FOR
INFRASTRUCTURE/TRANSPORT/RECREATION AND LEISURE**

Address	Site Reference	Area (ha)	Proposal
Land around Thickthorn Roundabout. Either side A11 (Hethersett)	GNLP0177-BR / GNLP0358R	134.00	Outdoor leisure, residential care assisted living, renewable energy generation
The Old Rectory Meadow, Reepham	GNLP1007	1.69	Infrastructure extension
East of Brundall Memorial Hall, Brundall	GNLP2069	8.67	Recreation and Leisure
Total area of land		144.36	

**STAGE 2 – HELAA COMPARISON TABLE
COMMERCIAL/EMPLOYMENT**

	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														
GNLP0323	Amber	Red	Amber	Green	Amber	Amber	Amber	Amber	Amber	Green	Red	Green	Amber	Green
GNLP0347	Amber	Green	Green	Green	Green	Amber	Green	Green	Green	Green	Green	Green	Amber	Green
GNLP0371	Amber	Amber	Amber	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Amber
GNLP0486	Amber	Amber	Amber	Green	Green	Green	Green	Amber	Amber	Green	Green	Green	Amber	Amber
GNLP1023-A	Amber	Amber	Amber	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green
GNLP1023-B	Amber	Amber	Amber	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green
GNLP3029	Amber	Amber	Amber	Amber	Green	Green	Amber	Green	Green	Amber	Green	Green	Green	Amber
GNLP3049	Green	Green	Amber	Green	Green	Amber	Green	Amber	Green	Amber	Green	Green	Green	Green

INFRASTRUCTURE/TRANSPORT/RECREATION AND LEISURE

	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														
GNLP0177BR/ GNLP0358R	Amber	Amber	Amber	Amber	Amber	Red	Amber	Amber	Amber	Amber	Red	Green	Amber	Amber
GNLP1007	n/a													
GNLP2069	n/a													

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

Site Reference	Comments
GNLP0323	<p>General comments: Four representations in objection and one comment including representation from Bixley Parish Council and Poringland Parish Council. Issues raised (1) Remote, site with poor unsuitable access from the highway, Poringland PC would oppose on these grounds but development otherwise welcome (2) Will attract additional traffic on already congested B1132 (3) Would contribute to spread of urbanisation into the countryside (3) Housing requirement in the area already met: further development unnecessary [NB housing is not in fact included as part of this proposal] (4) No local infrastructure to support scale of development proposed (5) Agree with "official assessment" [i.e. the GNLP HELAA suitability assessment concluding the site as unsuitable]</p> <p>Supporting representation on behalf of the site promoter Arminghall Settlement. Findings of HELAA contested: Client has sufficient landholdings in the area to ensure that adequate highway access can be created. Site provides an opportunity to serve an alternative employment market to that catered for by sites on the edge of Norwich, which command higher rents. Furthermore, it enables employment uses to be provided closer to existing settlements to the south of Norwich and will assist in reducing journey times and trip lengths to access such facilities – not acknowledged in the HELAA. HELAA Amber rating for landscape impact acknowledges impacts can be mitigated: site well-screened and surrounded by land within the same ownership therefore potential to mitigate any potential landscape impact. Site is low lying and screening acts to limit views of the existing farm buildings from publicly accessible areas. A carefully designed layout would work to limit both short range and long-range views towards the development. The design would also work with the locally characteristic vegetation noted in the published Landscape Character Assessment, such as small areas of woodland and hedgerows with trees, to further limit or mitigate views. Amber rating for townscape impact in the HELAA can be similarly mitigated although it is not clear which aspect of townscape is likely to be impacted on.</p>
GNLP0347	<p>One objection raised concerns regarding the scale of development already taken place in Loddon.</p>
GNLP0371	<p>Postwick with Witton Parish Council comments: The site has a pending application for a church meeting hall. The proposed development for shops is inappropriate due to similar facilities being nearby.</p>

GNLP0486	<p>General comments: Objections raised concerns regarding unsuitable roads, traffic congestion and loss of farm land.</p> <p>Cringleford Parish Council comments: Roughly half of the site lies in Hethersett and both parish councils must be consulted about development proposals. This has not always been the case. Development for employment is envisaged which, presumably, would relate to developments at Thickthorn Farm. Development for employment would further increase the urbanisation of the area adjacent to the Thickthorn interchange where a service station, motel, Burger King, park-and-ride and McDonalds already form what many would consider an inappropriate cluster of activities on the approach to the historic city of Norwich. Further strengthening of the cluster is undesirable. It would also further erode the Southern Bypass Protection Zone and the Strategic Gap, which are important to the landscape setting of Cringleford.</p>
GNLP1023-A	<p>General comments: One objection raised concerns regarding loss of walking routes especially for dog walkers, traffic congestion and lack of exercise facilities. This would also add pollution to the village.</p>
GNLP1023-B	<p>See above</p>
GNLP3029	<p>No comments as site submitted during stage B consultation</p>
GNLP3049	<p>No comment submitted as site submitted during stage B consultation.</p>
GNLP0177BR/ GNLP0358R	<p>General comments: One comment in support of site. The Site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of employment space being delivered on the site and is viable.</p> <p>Objections raised concerns regarding It would significantly encroach on the "firebreak" in development between Hethersett/Wymondham and Norwich - leading to an urban sprawl from the centre of Norwich to Wymondham.</p> <p>Cringleford Parish Council comments: 0358 is in Hethersett, but the development of the site for employment purposes would simply strengthen the cluster of employment-related activities around the Thickthorn interchange. See comments on 0486</p>
GNLP1007	<p>General comments: Objections raised concerns regarding it is unclear what area is required for the extension of the existing sewage works. Other</p>

	<p>issues include lack of public transport, road suitability and The Old Rectory Meadow is a 'water meadow' and greenfield site close to Reepham conservation area. There is a diverse range of flora & fauna on the water meadow site and I believe that developing this ancient meadow will have a negative impact on the biodiversity and geodiversity of the local area.</p> <p>Norfolk Wildlife Trust comments: This is STW expansion. If expansion is necessary at this STW, there will need to be mitigation and/or compensation with regard to impacts on CWS</p> <p>Reepham Town Council comments: Given that this site has been proposed for an extension to the sewage works, the Town Council has not expressed a view on this submission except that we believe it would be unsuitable for housing.</p>
GNLP2069	<p>General comments: Comments made in support of site. In support of Brundall Parish Council application to have the land next to the memorial Hall allocated for recreation - we badly need more land for this in Brundall over the years there have been several attempts to get planning permission to build houses on the land to the east of the memorial hall - but this is the only space left in Brundall that could be used for informal recreation suitable for all ages groups - being next to the hall will also be convenient for toilets and other hall facilities.</p> <p>One objection raised concerns regarding lack of infrastructure for scale of development, road safety, traffic congestion and lack of facilities.</p> <p>Norfolk Wildlife Trust comments: We support the provision of this site for recreation and leisure. This site has significant opportunities to provide important green infrastructure and open space, which we would be happy to comment on further during the further development of the plan.</p>

STAGE 4 – DISCUSSION OF SUBMITTED SITES

In this section sites are compared against each other with regard to the form and character of the settlements in the cluster and the relationship between them. The emerging spatial strategy and current commitments will also be considered. A conclusion is drawn on the suitability of sites to be shortlisted for further consideration using constraints identified in the HELAA, consultation comments and school capacity and accessibility information.

Commercial/Employment

Bixley

Park Farm, Bungay Road, Bixley, GNLP0323, 9.83 ha, Employment & Commercial use.

GNLP0323 is put forward for commercial use accessed from the B1322 Bungay Road. The site size is 9.83 ha and given the significant existing commitment for strategic employment land GNLP0323 is not preferred for further assessment. Constraints on development include highways access, surface water flood risk on part of the site, and heritage issues to the setting of the Church of St Wandregelius (Grade II* listed). The site is considered an unreasonable alternative for further assessment.

Loddon

Land to the south of the A146, Loddon, GNLP0347, 3.41 HA, Storage and Distribution Hub.

GNLP0347 is disconnected from the built edge of Loddon and is proposed to have access from the A146 Beccles Road. The Highways Authority has raised concern, saying it is not possible to achieve a suitable access. A further consideration is the size of the site and that there is a significant strategic commitment of employment land. For these reasons the site is an unreasonable alternative for further assessment.

Postwick

Land south A1042 Yarmouth Road. Postwick, GNLP0371, 3.08, ha, Commercial. To the north of Postwick village, GNLP0371 is a 3 ha site south of the Yarmouth Road (A1042) promoted for commercial uses (ranging from restaurant, café, public house, takeaway, creche or day nursery uses). Since its promotion the scheme has gained planning consent for a new church hall (D1 use class), access, car parking & landscaping (ref: 20180504). Given the recent permission it is not considered necessary to assess the site further, and the site is not preferred for allocation.

Hethersett

Land north of Norwich Road (Hethersett), GNLP0486, 14.83 ha Employment. The employment land proposal GNLP0486 is for a significant strategic scale of development. There is no identified need for this scale of development in the locality. GNLP0486 would also conflict with the designated “strategic gap” and Norwich Southern Bypass Landscape Protection Zone identified in the SNC Development Management Policies Local Plan. The site is considered an unreasonable alternative for further assessment.

Hethersett

Little Melton Business Park - Site A (land to west), GNLP1023-A, 2.9 ha, Food-led industrial.

This proposal is to the west of the existing Little Melton Food Park production facility. GNLP1023-A is a large strategic scale proposal in a relatively remote location between Hethersett to the south and Little Melton to the north. The site is 2.9 ha and given the significant existing commitment for strategic employment land is not preferred for further assessment for inclusion in the local plan.

Hethersett

Little Melton Business Park - Site B (land to east), GNLP1023-B, 10.7 ha, Food-led industrial.

This proposal is to the east of the existing Little Melton Food Park production facility. GNLP1023-B is a large strategic scale proposal in a relatively remote location between Hethersett to the south and Little Melton to the north. The site is 10.7 ha and given the significant existing commitment for strategic employment land is not preferred for further assessment for inclusion in the local plan.

Postwick with Witton

Land adjacent Postwick Interchange, Postwick, GNLP3029, 3.12 ha, Mixed use including leisure, roadside, retail

This is a 3.12 ha site surrounded on all sides by strategically important road network. To the immediate west is the Postwick Interchange, and the site itself would be accessed from the A1042. Part of the site was last used as a compound associated to the construction of the Postwick Interchange, and since then development proposals for a petrol filling station, roadside retail, and a hotel have been made. The latest application (20190300) for a petrol filling station and two drive-through restaurants is withdrawn. Separately, an appeal for development on the site was also dismissed. Constraints on the site mean it is considered an unreasonable alternative for further assessment and inclusion in the local plan.

Brundall

Land North of Yarmouth Road, Brundall, GNLP3049, 1.71 ha, Employment. GNLP3049 is situated along the Yarmouth Road next to permission 20161483. GNLP3049 is not an inappropriate location for employment development; but, it is not considered a strategic priority and is not integral to achieving the objectives of the local plan. To justify a local plan allocation in this location more evidence would be required about the need for the proposal and how it would be delivered. A proposal of this scale would probably be better dealt with through the planning application process.

Infrastructure/Transport/Recreation and Leisure

Hethersett and Ketteringham

Land around Thickthorn Roundabout, either side A11, GNLP0177-BR/GNLP0358R, 134 ha.

GNLP0177-BR/GNLP0358R measures 134 ha and is promoted for mixed uses, comprising walking and cycle links, outdoor leisure, residential care assisted living and retirement, and renewable energy generation. Constraints (and to some degree

opportunities of the site) are heritage assets, including Thickthorn Hall and a Medieval Moat in the grounds, set within historic parkland. Further considerations are the South Norfolk “Strategic Gap” and “Norwich Southern Bypass Landscape Protection Zone” development management policies. The A11 corridor is strategically important for growth but there are nearby significant allocations and commitments already in place. Given the significant existing commitment for development in Colney, Cringleford, Hethersett, and Wymondham GNLP0177-BR/GNLP0358R is not preferred for further assessment.

Reepham

The Old Rectory Meadow, Reepham, GNLP1007, 1.69 ha, Infrastructure extension Site GNLP1007 is proposed as an allocation for extension of the sewage treatment works, but Anglian Water have not sought such an allocation. If an extension to the treatment works was required this site and alternatives would be able to be considered and a planning application determined under existing policies, e.g. the Broadland Development Management DPD policy CSU1. As such, there is no identified need for an allocation to be made, and if the use was needed it would be appropriate for this to be considered as an application for planning permission. Therefore, the site is not shortlisted as a reasonable alternative for more detailed assessment.

Brundall

East of Brundall Memorial Hall, Brundall, GNLP2069, 8.67 ha, Recreation and Leisure.

On the eastern edge of Brundall, GNLP0436 and GNLP2069 are partially overlapping parcels of land east of the Memorial Hall. GNLP0436 is a 17 ha proposal for up to 250 dwellings, open space, recreation and leisure uses considered in the main Brundall site assessment booklet. On a slightly different boundary extent GNLP0436 is promoted for recreation and leisure. Constraints exist, most notably over access, landscape intrusion into the Witton Run, and the potential for recreational open space. A planning application on this site (reference 20171386) for 170 dwellings, sports pavilion, country park and outdoor recreation was refused in July 2019. This means that existing open space allocation BRU3 from the Broadland Local Plan will be carried forward but on a smaller boundary than this site. It is not proposed to enlarge the area of the BRU3 allocation so this site is considered to be unreasonable for allocation.

STAGE 5 – SHORTLIST OF SITES FOR FURTHER ASSESSMENT

Based on the assessment undertaken at stage 4 above the following sites are shortlisted for more detailed assessment

Address	Site Reference	Area (ha)	Proposal
None			
Total area of land			

STAGE 6 – HIERACHY BASED APPRAISAL OF SHORTLISTED SITES AND IDENTIFICATION OF PREFERRED SITE/S (WHERE APPROPRIATE) FOR REGULATION 18C DRAFT PLAN CONSULTATION

Of sites promoted for non-residential uses in key service centres none are being taken forward as proposed allocations or reasonable alternatives. Reasons include: constraints relating to the site making it unsuitable for allocation; a planning permission on the site determining its development potential already; or, that the site is not required for allocation to fulfil the objectives of the local plan.

Unreasonable Sites

KEY SERVICE CENTRES

Address	Site Reference	Area (Ha)	Proposal	Reason considered to be unreasonable
Acle				
NO UNREASONABLE NON-RESIDENTIAL SITES				
Blofield				
NO UNREASONABLE NON-RESIDENTIAL SITES				
Brundall (including Postwick)				
Land south A1042 Yarmouth Road, Postwick	GNLP0371	3.08	Commercial	This site is not preferred for allocation as consent has already been given under planning application reference 20180504.
East of Brundall Memorial Hall, Brundall	GNLP2069	8.67	Recreation and Leisure	A planning application on this site (reference 20171386) for 170 dwellings, sports pavilion, country park and outdoor recreation was refused in July 2019. This means that existing open space allocation BRU3 from the Broadland Local Plan will be carried forward but on a smaller boundary than this site. It is not proposed to enlarge the area of the BRU3 allocation so this site is considered to be unreasonable for allocation.
Land adjacent Postwick Interchange, Postwick with Witton	GNLP3029	3.12	Mixed use including leisure, roadside, retail	This site is well located, being surrounded on all sides by strategically important roads. To the immediate west is the Postwick Interchange and the site itself would be accessed from the A1042. At the time of writing a planning application (reference 20190300) has been submitted for a petrol filling station and two drive through restaurants. This site is not preferred for allocation as it is recognised that a proposal of this nature is better dealt with through the development management process.

Land North of Yarmouth Road, Brundall	GNLP3049	1.71	Employment	This site has the potential to provide local employment opportunities but is not preferred for allocation at the current time. To justify a local plan allocation in this location more evidence would be required about the need for the proposal and how it would be delivered. A proposal of this scale would probably be better dealt with through the planning application process.
Hethersett (including Thickthorn)				
Land around Thickthorn Roundabout. Either side of A11	GNLP0177-BR / GNLP0358R	134.00	Outdoor leisure, residential care assisted living, renewable energy generation	This site is not preferred for allocation as although the A11 is strategically important for growth there are already significant allocations and commitments in place nearby at Colney, Cringleford and Hethersett and further land of this scale is not needed at the current time. This site includes heritage assets such as Thickthorn Hall set within historic parkland. It is also within the strategic gap separating Hethersett and Cringleford and the Norwich Southern Bypass Landscape Protection Zone.
Land north of Norwich Road, Hethersett	GNLP0486	14.83	Employment	This site is not considered to be suitable for allocation as evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich. There is therefore no need to allocate any additional large-scale employment sites in the new local plan. Development in this location would impact on the Southern Bypass Landscape Protection Zone and the strategic gap between Hethersett and Cringleford.

Little Melton Business Park - Site A (land to west)	GNLP1023-A	2.90	Food-led industrial	This site is not considered to be suitable for allocation as evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich. There is therefore no need to allocate any additional large-scale employment sites in the new local plan.
Little Melton Business Park - Site B (land to east)	GNLP1023-B	10.70	Food-led industrial	This site is not considered to be suitable for allocation as evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich. There is therefore no need to allocate any additional large-scale employment sites in the new local plan.

Hingham

NO UNREASONABLE NON-RESIDENTIAL SITES

Loddon and Chedgrave

Land to the south of the A146, Loddon	GNLP0347	3.41	Storage and distribution hub	This site is not considered to be suitable for allocation as it is disconnected from the built edge of Loddon and there are concerns that it is not possible to achieve a suitable access. In addition, evidence suggests that current committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich meaning there is no need to allocate any additional large scale employment sites in the new local plan.
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Porringland (including Bixley)

Park Farm, Bungay Road, Bixley	GNLP0323	9.83	Employment & Commercial use	This site is not considered to be suitable for allocation as evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich. There is therefore no need to allocate any additional large-scale employment sites in the new local plan. Constraints on development include highways access, surface water flood risk on part of the site, and heritage issues to the setting of the Church of St Wandregelius (Grade II* listed).
Reepham				
The Old Rectory Meadow, Reepham	GNLP1007	1.69	Infrastructure extension	This site is not preferred for allocation as no identified need exists and this proposal could be dealt with by a planning application if needed .
Wroxham				
NO UNREASONABLE NON-RESIDENTIAL SITES				

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

Brundall including Postwick and Witton

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2069 East of Brundall Memorial Hall, Brundall (Unreasonable Non-Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	2 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Members of the public	Support	Concerned that appeal application could be permitted, pressure on local services and spoil residential amenity, loss of recreation land.	<ul style="list-style-type: none"> None 	The appeal decision is outside the local plan process.	None
Members of the public	Comment	Concern for increase in traffic.	<ul style="list-style-type: none"> None 	Noted. The site is not allocated.	None

Hethersett

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0177BR/0358R Land around Thickthorn Roundabout, either side of A11, Hethersett (Unreasonable Non-Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 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
Hethersett Parish Council	Support	Oppose development – see comments under 0177BR	<ul style="list-style-type: none"> None 	Noted	None
Pigeon/Pegasus (site promoter)	Object	Supports site, promotes new land	<ul style="list-style-type: none"> Delivery statement proposes new sites 	Please see response under GNLP0177BR and GNLP0358R	None

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0486 Land North of Norwich Road, Hethersett (Unreasonable Non-Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 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
Hethersett Parish Council	Support	Oppose development as more employment will drive demand for housing and erode strategic gap between Hethersett and Cringleford	<ul style="list-style-type: none"> • None 	Noted	None

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP1023A Little Melton Business Park – Site A. (Land to west) (Unreasonable Non-Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 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
Hethersett Parish Council	Support	Oppose development as Burnthouse Lane recently approved as school walking route. There should be no increase in HGV for safety reasons.	<ul style="list-style-type: none"> • None 	Noted	None
Pegasus/Pigeon (site promoter)	Object	Supports site, promotes new land	<ul style="list-style-type: none"> • Delivery statement contains new sites. 	Evidence suggests current land commitments are more than sufficient to meet the employment growth needs of Greater Norwich. On this basis GNLP1023A is not considered a reasonable	None

				alternative for employment- related development.	
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP1023B Little Melton Business Park – Site B (Land to the east) (Unreasonable Non-Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 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
Hethersett Parish Council	Support	Oppose development as Burnthouse Lane recently approved as school walking route. There should be no increase in HGV for safety reasons.	<ul style="list-style-type: none"> None 	Noted	None
Pegasus/Pigeon (site promoter)	Object	Supports site, promotes new land	<ul style="list-style-type: none"> Delivery statement proposes new sites. 	Evidence suggests current land commitments are more than sufficient to meet the employment growth needs of Greater Norwich. On this basis GNLP1023BR is not considered a	None

				reasonable alternative for employment- related development	
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Poringland, Framingham Earl and Framingham Pigot, including well related parts of Bixley, Caistor St Edmund and Stoke Holy Cross

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0323 Park Farm, Bungay Road, Bixley (Unreasonable Non-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
Crown point Estate via Pegasus Group	Object	<ul style="list-style-type: none"> Client has sufficient landholdings in area to ensure adequate highway access – highways and transport technical note included. Enables employment uses closer to existing settlements to south of Norwich. Site well-screened Possible to mitigate any landscape impacts Would result in net increase in employment floorspace 	<ul style="list-style-type: none"> Transport technical note submitted. Reconsider need for employment land for low-tech B1 and start-up development 	Flood Risk Assessment and heritage statement referred to but not submitted. Evidence suggests that currently committed land is more than sufficient to meet the employment	None

		<ul style="list-style-type: none"> • Brownfield site, building here could mean less building on greenfield sites elsewhere. • Provides opportunity for low-tech and smaller/start-up businesses, at a reasonable cost, not catered for within GNLP. • Listed building noted and setting will remain largely unchanged in terms of character and appearance. • Flood Zone 1 		<p>growth needs in the area.</p>	
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Reepham

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP1007 The Old Rectory Meadow, Reepham (Unreasonable Non-Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 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
Reepham Town Council	Support	Supports decision that site is unreasonable for housing due to competing proposal for extension to WTC	<ul style="list-style-type: none"> Proposal was for WTC extension, not housing 	The site was proposed to GNLP as an extension to the Water Treatment Centre and therefore was not assessed for housing.	None

**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
Hethersett				
Land south east and west of Hethersett	GNLP0177BR	95.69	Open space, care, business	Unreasonable
Little Melton Business Park (Site B (land to east))	GNLP1023BR	16.05	Food Hub	Unreasonable
Hingham				
South of Watton Road, rear of GNLP0335	GNLP4007	4.24	Community Woodland	New Site
Reepham				
South of the high school, Whitwell Road	GNLP4055	0.84	School playing field	New Site
TOTAL		116.82		

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.

Hethersett

Land south east and west of Hethersett, GNLP0177BR, 95.69 ha, Open space, care, business

The previous proposal for GNLP0177 measured 134 ha, whereas this revised proposal measures 95 ha and has a different mix of uses. Three areas of development are proposed: (a) Community Business Hub Site A (1.4 ha); (b) Community Business Hub Site B (2.2 ha); and (c) Limited Scale Care Use (7.6 ha). The remainder is proposed as an “area for controlled permissive pedestrian and cycle routes with new outdoor recreational and leisure facilities.” Sites A, B, and C within GNLP0177BR are located in close proximity to the existing Thickthorn Park & Ride facility, its proposed extension, and the planned Highways England A11/A47 Thickthorn junction improvements. However, to justify a local plan allocation in this location more evidence is needed of likely end-user businesses to bring forward Sites A and B, and likewise evidence about the deliverability of the care village on Site C. The suitability of GNLP0177BR for development should also become clearer once funding and scheme layout decisions are made about the Highways England Thickthorn junction scheme (for which submission of the development consent order to the Planning Inspectorate is expected early 2021). Due to the uncertainties described, GNLP0177BR is not considered to be a reasonable alternative at the current time.

Hingham

South of Watton Road, rear of GNLP0335, GNLP4007, 4.24 ha, Community Woodland

There is no specific evidence to justify the allocation of GNLP4007 for community woodland and it is noted that the promoter's willingness to provide the land is contingent on the allocation of neighbouring land for residential use (GNLP0335). On this basis, GNLP4007 is unreasonable to consider for allocation in its own right and should instead be assessed in conjunction with GNLP0335 (which is a site measuring 5.81 ha promoted for 100-200 homes).

Little Melton

Little Melton Business Park – Site B (land to east), GNLP1023BR, 16.05 ha, Food Hub

GNLP1023-B originally measured 10.70 ha and this revised proposal includes an additional 6 ha to the south. Despite the change in site area the conclusion reached about GNLP1023BR remains the same in that evidence suggests current land commitments are more than sufficient to meet the employment growth needs of Greater Norwich. On this basis GNLP1023BR is not considered a reasonable alternative for employment-related development.

Reepham

South of the high school, Whitwell Road, GNLP4055, 0.84 ha, School playing field
GNLP4055 is adjacent to the existing high school playing field and its extension would be of obvious community benefit. Provision of GNLP4055 is though linked to the development of REP1 (an existing allocation of 8.2 ha for residential and community facilities). On this basis, GNLP4055 is undeliverable in its own right and unreasonable to consider for allocation. Instead, the inclusion of the additional playing field needs to be considered in conjunction with a planning application for developing REP1.

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.

None

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

None

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 considered to be unreasonable
Hethersett (including Thickthorn)				
Land south east and west of Hethersett	GNLP0177B R	95.69	Open space, care, business	The previous proposal for GNLP0177 measured 134 ha, whereas this revised proposal measures 95 ha and has a different mix of uses. Three areas of development are proposed: (a) Community Business Hub Site A (1.4 ha); (b) Community Business Hub Site B (2.2 ha); and (c) Limited Scale Care Use (7.6 ha). The remainder is proposed as an “area for controlled permissive pedestrian and cycle routes with new outdoor recreational

				and leisure facilities.” Sites A, B, and C within GNL0177BR are located in close proximity to the existing Thickthorn Park & Ride facility, its proposed extension, and the planned Highways England A11/A47 Thickthorn junction improvements. However, to justify a local plan allocation in this location more evidence is needed of likely end-user businesses to bring forward Sites A and B, and likewise evidence about the deliverability of the care village on Site C. The suitability of GNL0177BR for development should also become clearer once funding and scheme layout decisions are made about the Highways England Thickthorn junction scheme (for which submission of the development consent order to the Planning Inspectorate is expected early 2021). Due to the uncertainties described, GNL0177BR is not considered to be a reasonable alternative at the current time.
Little Melton Business Park - Site B (land to east)	GNL1023-B	10.70	Food-led industrial	This site is not allocated as evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich. There is therefore no need to allocate any additional large-scale employment sites in the new local plan.
	GNL1023BR	16.05	Food Hub	GNL1023-B originally measured 10.70 ha and this revised proposal includes an additional 6 ha to the south.

				Despite the change in site area the conclusion reached about GNLP1023BR remains the same in that evidence suggests current land commitments are more than sufficient to meet the employment growth needs of Greater Norwich. On this basis GNLP1023BR is not considered a reasonable alternative for employment-related development.
Hingham				
South of Watton Road, rear of GNLP0335	GNLP4007	4.24	Community Woodland	GNLP4007 is unreasonable to consider for allocation in its own right and should instead be assessed in conjunction with GNLP0335 (which is a site measuring 5.81 ha promoted for 100-200 homes).
Reepham				
South of the high school, Whitwell Road	GNLP4055	0.84	School playing field	GNLP4055 is undeliverable in its own right and unreasonable to consider for allocation. Instead, the inclusion of the additional playing field needs to be considered in conjunction with a planning application for developing REP1.

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 eight sites promoted for commercial/employment uses, and three sites for tourism/open space, across the Key Service Centres. 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. Reasons included: constraints relating to the site making it unsuitable for allocation; a planning permission on the site determining its development potential already; or, that the site is not required for allocation to fulfil the objectives of the local plan.

Non-residential uses across the Key Service Centres (KSCs) were limited to consideration of existing site allocations in the Regulation 18C consultation.

Summary of comments from the Regulation 18C draft plan consultation

Through the Regulation 18C consultation relatively few comments were received regarding the non-residential sites across the KSCs, but what was said has been taken into account (see part 2 above).

Comments included:

Site GNLP2069 in Brundall which partly overlaps carried forward allocation BRU3 received comment over concerns for its development.

In Hethersett, responses were received on sites GNLP0177BR/0358R, and GNLP0486. Regarding GNLP0177BR/0358R the promoter submitted detailed representations, but the Parish Council expressed opposition. Likewise, about GNLP1023A and GNLP1023B representations from the promoter were countered by opposition from the Parish Council. The Parish Council also opposed GNLP0486.

Site GNLP0323 in Poringland received comment from the promoter about the deliverability of development on their site.

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

Two new sites and two revised sites were submitted through the Regulation 18C consultation. The two revised sites are within the Hethersett cluster (Little Melton being within the same catchment). The two new sites are in Hingham and Reephams respectively. All the new and revised sites were subject to the same process of assessment as the earlier sites (detailed in part 3 of this booklet).

As to the revised sites, GNLP0177BR measures 95.69 ha, comprised from a mixed open space, care accommodation, and business uses. Assessment of GNLP0177BR raises questions about deliverability, due to the absence of evidence about end-user businesses and how development would integrate to the Thickthorn A11/A47 junction improvements. The second revised site (GNLP1023BR) represents a 16.05 ha extension to the existing Little Melton Business Park. GNLP1023BR is adjudged

unreasonable as evidence suggests current land commitments are more than sufficient to meet the employment growth needs of Greater Norwich.

None of the new and revised sites were considered to be suitable for allocation.

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 have been incorporated in policy requirements as appropriate. The Sustainability Appraisal (which can be found in the evidence base [here](#)) highlighted a number of negative and positive impacts for non-residential sites across the Key Service Centres (KSCs).

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 is to make no new non-residential allocations in the key service centres in addition to the carried forward allocations included within the Regulation 18C draft plan consultation..

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