Hierarchy:	Village Clusters
Settlements:	Smaller settlements and countryside in Broadland and South Norfolk

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 COMMERICAL/EMPLOYMENT

Address	Site Reference	Area (ha)	Proposal
Land at Seething Airfield, Brooke	GNLP0071R	4.91	Employment
Land at Little Green, Bunwell	GNLP0224	2.50	Employment
Land off Station Lane, Ketteringham (Mulbarton)	GNLP0245	7.92	Commercial
Willow Farm. Haddiscoe (Toft Monks)	GNLP0455	0.48	Employment
North of NDR (Horsham St Faith)	GNLP0466R	33.00	Employment
Land West of A140, Adjacent Hickling Lane, Swainsthorpe	GNLP0604R	10.99	Workshops, stores, offices, agricultural sales
Adjacent 10 Buxton Road, Frettenham	GNLP2076	0.39	Employment
North of Octagon Business Park, Gt & Lt Plumstead	GNLP2107	1.62	Office, storage
Former waste transfer station, Tivetshall	GNLP2128	1.80	Retail/petrol station
Glebe Farm North, Horsford	GNLP2133	26.23	Employment/mixed
Adjoining Fakenham Road, Attlebridge	GNLP2144	1.23	Industrial

South of Drayton Lane, Horsford	GNLP2154	2.30	Retail/car parking
East of Ipswich Road (Stoke Holy Cross/Poringland	GNLP2158	49.90	Commercial
Wymondham Road, East Carleton (Mulbarton)	GNLP2165	1.15	Employment
Adjacent Ashwellthorpe Industrial Estate	GNLP2182	6.10	Employment
East of Brook Farm, Gt & Lt Plumstead	GNLP3034	36.84	Employment B1, B2, B8
Total area of land		187.36	

LIST OF SITES TO BE CONSIDERED FOR TOURISM/OPEN SPACE

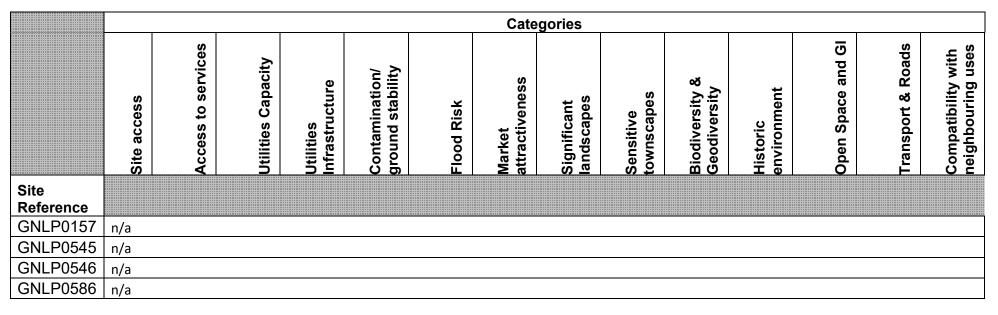
Address	Site Reference	Area (ha)	Proposal
Land to the north of Salhouse Road, Salhouse	GNLP0157	22.51	Tourism
Tacolneston Conservation Area	GNLP0545	19.68	Preservation as local green space
Tacolneston Manor House Area Local Green Space	GNLP0546	6.86	Preservation as local green space
Land North of Council field, Heath Lane, Lenwade/ Gt Witchingham	GNLP0586	2.94	Open space
Total area of land		51.99	

STAGE 2 – HELAA COMPARISON TABLE

COMMERICAL/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 Gl	Transport & Roads	Compatibility with neighbouring uses
Site Reference														
GNLP0071R	Amber	Amber	Amber	Amber	Amber	Green	Amber	Green	Green	Amber	Green	Green	Amber	Amber
GNLP0224	Amber	Amber	Amber	Green	Green	Amber	Green	Green	Green	Amber	Amber	Green	Amber	Green
GNLP0245	Amber	Red	Amber	Green	Amber	Green	Amber	Green	Green	Green	Green	Green	Amber	Green
GNLP0455	Amber	Amber	Amber	Green	Green	Red	Green	Amber	Green	Amber	Green	Green	Amber	Amber
GNLP0466R	Green	Green	Amber	Green	Amber	Green	Green	Green	Green	Green	Amber	Green	Green	Green
GNLP0604R	Amber	Amber	Amber	Green	Green	Amber	Green	Green	Green	Green	Green	Green	Red	Green
GNLP2076	Amber	Amber	Amber	Green	Amber	Green	Amber	Green	Green	Amber	Green	Green	Amber	Green
GNLP2107	Amber	Amber	Green	Green	Green	Green	Green	Amber	Green	Green	Amber	Green	Amber	Green
GNLP2128	Amber	Amber	Green	Green	Green	Green	Green	Amber	Green	Green	Amber	Green	Amber	Green
GNLP2133	Amber	Green	Amber	Green	Green	Green	Green	Amber	Amber	Green	Green	Green	Amber	Amber
GNLP2144	Amber	Amber	Amber	Green	Amber	Green	Amber	Green	Green	Amber	Green	Green	Amber	Green
GNLP2154	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green
GNLP2158	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green
GNLP2165	Amber	Red	Green	Green	Green	Green	Green	Green	Amber	Amber	Amber	Green	Red	Green
GNLP2182	Green	Amber	Amber	Green	Amber	Amber	Amber	Green	Amber	Amber	Green	Green	Green	Green
GNLP3034	Red	Amber	Green	Green	Green	Amber	Green	Green	Green	Green	Green	Green	Red	Green

OPEN SPACE



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

Site Reference	Comments
GNLP0071R	No comments submitted.
GNLP0224	General comments: Objection from an individual: issues raised (1) Site not well-related to settlement; (2) Likely light pollution from adjoining industrial area.
GNLP0245	General comments: One objection raised concerns regarding an adequate route for northbound traffic from the site using the A11/A47 junction at Thickthorn.
GNLP0455	Broads Authority comments: 'This is near our border. Would welcome early discussions on this. Would be extending the built-up area in a way that could affect the Broads. Dark skies. Potential for visual impact on the Broads landscape. Also, GNLP 0414 More limited potential for visual impact but early discussions on this would also be welcomed.'
GNLP0466R	General comments: One comment in support of site. In summary, Horsham Properties support the incorporation of the existing employment allocation (site reference GNLPSL0466) within the Greater Norwich Local Plan (GNLP) and note that sufficient planning harm does not arise to justify the current policy restrictions tying the site to airport related uses or controlling the mix of industrial use classes. Any associated policy wording should also be reviewed to promote the comprehensive delivery of the allocation, taking account of the current geography, necessity to promote long term viability and flexibility of businesses, and the need to ensure the impacts of development are suitably mitigated.
	Horsham and Newton St Faiths Parish Council comments: The Council is opposed as they feel that there are sufficient industrial estates in the area already and this would increase traffic in an already heavily congested area.
GNLP0586	General comments The description of the proposed development in the HEELA does not match the GNLP description.
	The road access is not suitable for residential development as Heath Lane is narrow and does not support two-way traffic. Access from Heath Lane onto A1067 is obscured and there is limited site of oncoming vehicles. Public open space would be

		acceptable provided there was access via the existing Right of Way.
		Great Witchingham Parish Council comments Objections raised regarding concerns for access from Heath Lane onto A1067 being obscured due to poor visual splays and limited sight of oncoming vehicles from Sparham Hill. Heath Lane is narrow and does not support two-way traffic, dangers would be exacerbated by any future development and increase with the volume of traffic.
ł	GNLP0604R	General comments
		Objections raised concerns regarding, traffic congestion, road safety, lack of facilities, access (Church Lane onto A140 is unsafe), site it outside development boundary, environmental and infrastructure issues, pollution, wildlife impacts, scale of development, no medical centre, shop, post office or school and agricultural impacts.
		Comments submitted in support of site. 'Agriculture is so important to Norfolk. Modern technologies & machinery to aid farming are vital to our rural economy. Companies willing to invest in our Counties main industry's future must be supported. Farming companies need to be in rural areas, this surely makes common, economic and environmental sense. The A140 that area is in desperate need of investment and development. Agri businesses across Norfolk are in rural areas supporting farmers but in South Norfolk there is a real lack of support for the farmers, this development and location would very much be in the interest of Norfolk and the farming community.'
		 Swainsthorpe Parish Council comments The Council objects strongly to the proposal of industrial development on a pristine greenfield site not contiguous with any other residential or commercial property and has concerns about: Loss of amenity, walks and views Pollution by noise, lights and effluent Disturbance to village life of 24/7 working Impact on traffic flow Impact on the water course and possible surface flooding.
	GNLP2076	General comments: Comments submitted in support of site as it has 'excellent' access and good visibility in both direction from proposed entrance. It will also compliment the units already in situ. GNLP2078 and GNLP2076 would add to the village as opposed to GNLP0492 which with the poor access onto Post Office Road and five-road junction has already drawn criticism from Highways stating that the layout would need to be changed before any development could be considered.

	Refer to consultation website to find an indicative layout masterplan incorporating site submissions 2078 and 2076.
GNLP2107	General comments: Comments raised regarding economic, environmental and social gains are worth the loss of a further green field site. Employment close to village of residence is to be encouraged. The road network remains an issue for any expansion.
	Great & Little Plumstead Parish council comments Objections raised regarding conserving the natural environment and agricultural land, road safety issues, access, flooding, drainage and infrastructure. Concern that the form and character of the village would be changed by development.
GNLP2128	General comments: Objections raised concerns regarding access, road safety, site should be retained as semi-industrial site, no shop, sewerage system, wild & environment, proximity to a roundabout and lack of services.
	Comments submitted in support of site to be developed to provide housing. There is good access and traffic would not compromise road safety on the internal narrow parish roads. Recognising this is a brownfield site and is not a loss of open space and gives developers an opportunity with less restrictions of matching the existing character of the rest of the parish.
	Comments submitted in support of site. The site is considered suitable for development for convenience retail/services including a small to medium sized refuelling station. It would be worth considering the redevelopment of the site for residential uses as well.
	Tivetshall St Margaret & Tivetshall St Mary Parish Council comments: A refuelling station in Long Stratton (4.5 miles north on A140) closed in the 1990s due to lack of trade. Permission has been granted for a refuelling station a few miles south at the Scole roundabout. Therefore the refuelling facility is well catered for and meets local needs. Retail outlets already exist nearby at Pulham Market where a general stores includes a Post Office. Cherry Lane Garden Centre (0.4 miles north on A140) also incorporates a full grocery, hardware, furniture, handicrafts, haberdashery, clothing, books and cards, a restaurant and takeaway. It is served by a large car park. Goodies (1.5 miles north on A140) is a full retail butchery, also retailing local provisions, craft items and again incorporates a restaurant. Any additional retail outlets in the vicinity will detract custom from these existing businesses and are therefore undesirable.

GNLP2133	 General comments: Objections raised concerns regarding traffic congestion, scale of development and unnecessary pressure on local services. One comment in support of site suggest is suitable, available, achievable and viable, and is deliverable within the first five years of the Greater Norwich Local Plan period. There are no constraints that would prevent the site from coming forward for employment-led mixed-use development, with potential land for residential uses. On this basis, the site should be taken forward as an allocation for employment-led mixed-use development in the emerging Local Plan. Horsford Parish Council comments:
	would be a constraint and any residential development would be disconnected from the main part of the village.
GNLP2144	No comments submitted
GNLP2154	General comments: Objections raised concerns regarding traffic congestion and there are potential, existing sites in the village for additional retail solution.
	One comment submitted in support of site. The Horsford Neighbourhood Plan indicates that the existing supermarket is not adequate in size for meeting the needs of the current population and a new or expanded supermarket is required as Horsford grows. The site promoter is undertaking further work to assess the impact and mitigation opportunities based on the assessment findings and is working closely with stakeholders and decision makers with requirements being met where justified for later submission.
	Horsford Parish Council comments: The Council objects citing inadequate highway provision and the fact that it is at the extremity of the village meaning it is very disconnected and any retail unit would have to be accessed mainly by motor vehicle.
GNLP2158	General comments: Objections raised concerns regarding This site is mostly in the valleys of the River Yare and River Tas, which are covered by Policy DM 4.5. It is also within the Bypass Landscape Protection Zone (NSBLPZ) and is constrained by Landscape Setting of Norwich Policy DM 4.6. Policy DM 4.5 includes the statement "Development proposals that would cause significant adverse

	impact on the distinctive landscape characteristics of an area will
	be refused." Policy DM 4.6 includes the statement "Development which would significantly harm the NSBLPZ or the landscape setting of the Norwich urban area will not be permitted." Furthermore, any development in this area will add to the already severe traffic congestion at Harford Bridge. Other issues include intrusion into the 'green corridor', removal of the distinct landscape characteristics and has poor transport links.
	One comment submitted in support. There are no constraints that would prevent appropriate development. Accordingly, our client considers the site to be suitable, available and achievable, and therefore deliverable within the Plan period. With the potential to provide 3,800 new jobs, the site would make a significant valuable contribution to the employment land requirements within the Plan period. See full report.
	Norfolk Wildlife Trust comments: We object to the inclusion of this site in the plan, due to the loss to Depot Meadow County Wildlife Site which would occur. We strongly recommend that this site is removed from any further consideration in the plan.
	South Norfolk Council comments: The north-western part of the site is in Flood zones 2 & 3
GNLP2165	General comments: The applicant states that there are no heritage assets nearby. This is not strictly true, as the site is very close to both the Grade II listed White House Farm of which the site was once part, and is directly adjacent to a residential development of barns which originally formed part of the farm which are also Listed (the law provides that buildings and other structures that pre-date July 1948 and are within the curtilage of a listed building are to be treated as part of the listed building).
	The response to item 7h is also incorrect. The entire western border of the site is directly adjacent to a residential property, so to say that there would be low impact to neighbouring uses is, in our view, inaccurate. Swardeston Parish Council comments: This road is entirely unsuitable for use of access additional dwellings and a business and offices as suggested. There is no demand for such facilities that would outweigh the negative impact
	on a small country lane and the parish council is opposed to this site being included in the local plan.
GNLP2182	General comments:

	Two objections raised concerning infrastructure already at capacity, road safety, scale of development proposed, flood risk and any further development should be small to suit the village size with its limited facilities and narrow roads. The existing South Norfolk Local Plan, adopted in 2015 and covering up to 2026 allocated ten houses to Wreningham. Since then at least 15 homes have been built.
	One comment raised suggesting any approval should maintain an open ditch along the proposal area & improve its flow, improve the flow across Wymondham road at The Loke, provide funds to construct another pipe/culvert across Wymondham road into the open ditch to deflect the flow in the covered pipe in this point, clear the small pipe that flows along the north of Wymondham Road and The Loke and work with the Parish Council, South Norfolk Council and Norfolk County Council.
GNLP3034	No comments as site submitted through Stage B Consultation
GNLP0157	 General comments: Likely to be too late for the Broads Local Plan. No details provided other than tourism use. Partly within the Salhouse Conservation Area. Broads Authority comments: Site appears party in Broads area, would like more discussion as lack of information is provided about the site. Salhouse Parish Council comments: The council has made comments regards the fact no details were given other than tourism use. Concerns raised over parking and traffic congestion, highly valued site, historic landscape and environmental concerns. They would not have objections provided the site covered no greater an area, the density and visual impact should be no greater than present, the use is seasonal and car parking and access issues are resolved.
GNLP0545	General comments: Comments raised in support of keeping site as green space, maintain the unique character surrounding the old, listed building.
GNLP0546	General comments: One comment submitted in support of site: I support the proposal to maintain this part of Tacolneston as 'green space'. It maintains the unique character surrounding a number of old, listed buildings and provides a natural break within the Village supporting wildlife. In a recent petition to the Parish Council, this is also supported by parishioners.

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

Seething

Land at Seething Airfield, Brooke, GNLP0071R, 4.9 ha, Employment use.

Site GNLP0071 at Seething Airfield (in Mundham parish) comprises brownfield land in a range of established industrial and agricultural uses. Existing buildings are used by Rattlerow Farms Ltd and J & H Bunn Ltd. The use of the land by these businesses is established and as no actual change in land use is proposed by GNLP0071R an allocation appears unnecessary.

<u>Bunwell</u>

Land at Little Green, Bunwell, GNLP0224, 2.5 ha, Employment.

GNLP0224 is a freestanding employment site some distance from the village core. GNLP0224 is not particularly well located and evidence shows that there is no quantitative need for further employment. There are also no known end-user businesses identified for the site. On this basis GNLP0224 is considered an unreasonable alternative.

Ketteriingham

Land off Station Lane, Ketteringham, GNLP0245, 7.92 ha, Commercial.

The proposal is in part for waste depot uses but also general employment uses. 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.

Toft Monks

Willow Farm. Haddiscoe, GNLP0455, 0.48 ha, Employment.

GNLP0455 is promoted for commercial development. This is a small remote site located in the northern part of the parish towards Lower Thurlton. It is not considered to be suitable for allocation as it is located within fluvial flood zones 2 and 3 and is therefore heavily constrained. It has been proposed for employment uses connected

to the adjacent business and would be better to come forward through the planning application process.

Horsham and Newton St Faiths

North of NDR (Horsham St Faith), GNLP0466R, Employment.

This subsumes the allocation HNF2 from the Broadland Local Plan. As well as being slightly larger than HNF2, a further difference is that GNLP0466R has been promoted without the restriction on employment uses benefitting from an airport location. A degree of relaxation in stipulating airport related uses could arguably assist in delivering development in this key strategic location. It is proposed to carry forward the HNF2 allocation to allow a full range of employment uses, including those benefitting from a location close to the airport.

Swainsthorpe

Land West of A140, Adjacent Hickling Lane, GNLP0604R, 10.99 ha, Workshops, stores, offices, agricultural sales.

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. The site is also subject to a planning application by Ben Burgess agricultural machinery (reference 2018/2631) and would be better dealt with through the development management process.

<u>Frettenham</u>

Adjacent 10 Buxton Road, Frettenham, GNLP2076, 0.39 ha, 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.

Great and Little Plumstead

North of Octagon Business Park, Gt & Lt Plumstead, GNLP2107, 1.62 ha, Office, Storage

This site has the potential to provide local employment opportunities but is not preferred for allocation at the current time, 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.

Tivetshall St Mary and St Margaret

Former waste transfer station, Tivetshall, GNLP2128, 1.8 ha, Retail/petrol station.

GNLP2128 is promoted for a retail/petrol station to the east of the Tivetshall St Mary and Tivetshall St Margaret village cluster. An important consideration is GNLP2128 has brownfield status as a former waste transfer station. This site is not considered to be suitable for allocation as to justify a local plan allocation in this location more evidence would be required to demonstrate need and the likely end-user businesses who would bring forward development.

<u>Horsford</u>

Glebe Farm North, Horsford, GNLP2133, Employment/mixed.

GNLP2133 measures 26 ha and is promoted for employment uses with no specified end-user. There are already large nearby commercial allocations that are undeveloped, and so full assessment of more land is unnecessary. There are commercial allocations at Horsham St Faiths (HNF2 and HNF3) that total 37.9 ha, as well as employment uses north of the Airport (known as Imperial Park) that totals 46 ha. There is therefore no need to allocate any additional large-scale employment sites in the new local plan.

<u>Attlebridge</u>

Adjoining Fakenham Road, Attlebridge, GNLP2144, 1.23 ha Industrial.

This site is proposed for industrial development and would be accessed from the nearby roundabout with the Broadland Northway, however there are concerns about the suitability of the access. The site could potentially provide local opportunities but to justify a local plan allocation in this location more evidence would be needed about the likely end user businesses who would bring forward development.

Horsford

South of Drayton Lane, Horsford, GNLP2154, Retail/car parking.

GNLP2154 is a 2.4 ha site promoted specifically for a supermarket, but the site is not an accessible walking distance from the village, and so is not preferred for full assessment.

<u>Caistor St Edmund</u> East of Ipswich Road, GNLP2158, 49.90 ha, Commercial. GNLP2158 is north of the A47 junction and east of the A140 near the Harford Bridge Tesco. The site size is 49 ha and given the significant existing commitment for strategic employment land GNLP2158 is not preferred for further assessment.

East Carleton

Wymondham Road, East Carleton, GNLP2165, 1.15 ha, Employment.

This is a 1.15 ha site, south of Wymondham Road, promoted as a business park, including offices, as well as four dwellings. The site's remoteness to core services and the road network are significant matters that would be difficult to mitigate. GNLP2165 is not preferred for allocation as its remoteness to core services and the inadequacy of the road network are significant constraints.

Ashwellthorpe (Wreningham booklet)

Adjacent Ashwellthorpe Industrial Estate, GNLP2182, 6.10 ha, Employment.

This site is located north and south of the existing Ashwellthorpe Industrial Estate and is proposed for commercial development (B1, B2 and B8). Expansion of the Industrial Estate is not necessarily inappropriate; but, more detail is needed on access arrangements and potential end-users to justify an allocation. Given the significant existing commitment for strategic employment land, and the site constraints, it is not preferred for further assessment for inclusion in the local plan.

Great and Little Plumstead

East of Brook Farm, Gt & Lt Plumstead, GNLP3034, 36.84 ha, Employment B1, B2, B8.

GNLP3034 is a large strategic extension to the Broadland Business Park. Given the existing commitment for strategic employment land GNLP3034 is not preferred for further assessment.

Tourism/Open Space

<u>Salhouse</u>

Land to the north of Salhouse Road, Salhouse, GNLP0157, 22.51 ha, Tourism.

The only non-residential site promoted in Salhouse is GNLP0157 for tourism use near Salhouse Broad. GNLP0157 is considered to be a reasonable site proposal, as Salhouse Broad is already a visitor attraction for sailing, canoeing walking, and camping. However, GNLP0157 is not preferred for allocation at the current time as further information is required regarding the need for the proposal and exactly what is planned for the site. (Note: The site is also partially within the Broads Authority administrative area.)

Lenwade/Gt Witchingham

Land North of Council Field, Heath Lane, Lenwade/ Gt Witchingham, GNLP0586, 2.94 ha, Open Space

This site is not preferred for allocation as there is no evidence of the need for additional open space in Great Witchingham/Lenwade. In addition, the adjacent site promoted for housing is considered to be unreasonable due to highway constraints.

Tacolneston

Tacolneston Conservation Area, GNLP0545, 19.68 ha, Preservation as local green space.

In respect of GNLP0545 the northern part of the village is characterised by a dispersed pattern of mainly linear development, with mature trees and hedgerows. This site is not considered to be suitable for allocation as a local green space because as submitted it is too large and does not meet the requirements as defined in the National Planning Policy Framework. This proposal would be more appropriate as part of a Conservation Area Appraisal or a smaller Local Green Space Designation in a Neighbourhood Plan.

Tacolneston

Tacolneston Manor House Area Local Green Space, GNLP0546, 6.86 ha, Preservation as local green space.

With regards to GNLP0546 it forms a significant part of the village's setting and encompasses the Grade II listed buildings associated to Manor House. This site is not considered to be suitable for allocation as a local green space because as submitted it is too large and does not meet the requirements as defined in the National Planning Policy Framework. This proposal would be more appropriate as part of a Conservation Area Appraisal or a smaller Local Green Space Designation in a Neighbourhood Plan.

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
North of NDR (Horsham St Faith)	GNLP0466R	33.00	Employment
Land to the north of Salhouse Road, Salhouse	GNLP0157	22.51	Tourism
Total area of land		55.51	

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

Of the sites promoted for non-residential uses only GNLP0466R is favoured for allocation on the boundary that coincides with existing allocation HNF2. HNF2 is already part of the strategic employment land supply, and so is appropriate to retain; but, not the additional land promoted under GNLP0466R.

GNLP0157 is the only site assessed as a reasonable alternative option. In principle, some tourism uses are likely to be acceptable on GNLP0157, but more information on the development proposal and its impact on the sensitive Broads location is required.

As to other non-residential sites within the villages cluster booklet, reasons for not allocating sites include: constraints relating to the site making it unsuitable for allocation; that sufficient strategic employment land is already identified; or, that the site proposal is not relevant to a local plan allocation.

Preferred Sites

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating			
SOUTH NORFOLK VILL	a de la companya de l						
NO PREFERRED NON-F	RESIDENTIAL	SITES II	N SOUTH NO	RFOLK VILLAGES			
BROADLAND VILLAGE	S						
Blofield Heath and Hem	blington						
NO PREFERRED NON F	RESIDENTIAL	SITES					
Buxton with Lamas and	Brampton						
NO PREFERRED NON-F	RESIDENTIAL	SITES					
Cantley							
NO PREFERRED NON-F	NO PREFERRED NON-RESIDENTIAL SITES						
Cawston, Brandiston ar	nd Swanningto	on					
NO PREFERRED NON-RESIDENTIAL SITES							
Coltishall, Horstead with Stanninghall and Belaugh							
NO PREFERRED NON-F	RESIDENTIAL	SITES					
Foulsham and Themelth	norpe						
NO PREFERRED NON-F	RESIDENTIAL	SITES					

Address	Site	Area	Proposal	Reason for allocating
	Reference	(Ha)		
Freethorpe, Halvergate	and Wickhamr	oton		
NO PREFERRED NON-R				
Frettenham				
NO PREFERRED NON-R	RESIDENTIAL S	SITES		
Great and Little Plumste	ad			
NO PREFERRED NON-R		SITES		
Great Witchingham, Len		I Longv	ille, Alderford, A	ttlebridge, Little
Witchingham and Morto				
NO PREFERRED NON-R	RESIDENTIAL S	SHES		
Hainford and Stratton St	trawless			
NO PREFERRED NON-R		SITES		
Hevingham				
NO PREFERRED NON-R	RESIDENTIAL S	SITES		
Horsford, Felthorpe and	Haveringland			
NO PREFERRED NON-R				
Horsham St Faith and N			T	Τ
North of NDR, Horsham St Faith	GNLP0466R	33.00	Employment	This site is similar in scale to allocation HNF2 from the Broadland Local Plan. Site GNLP0466R has been promoted to remove the restriction on the existing allocation for employment uses benefitting from an airport location to allow unrestricted employment use. It is proposed to carry forward the HNF2 allocation to allow a full range of employment uses, including those benefitting from a location close to the airport. The site boundary for

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating		
				GNLP0466R is slightly larger than the HNF2 allocation but it is not proposed to amend the existing allocation boundary at the current time.		
Lingwood and Burlingha	am, Strumpsh	aw and	Beighton			
NO PREFERRED NON-R	ESIDENTIAL	SITES				
Marsham						
NO PREFERRED NON-R	NO PREFERRED NON-RESIDENTIAL SITES					
Reedham	Reedham					
NO PREFERRED NON-RESIDENTIAL SITES						
Salhouse, Woodbastwick and Ranworth						
NO PREFERRED NON-R	ESIDENTIAL	SITES				

Reasonable Alternatives

Address	Site Reference	Area (Ha)	Proposal	Reason for not allocating					
SOUTH NORFO			1						
			N-RESIDENTIAL S	ITES IN SOUTH NORFOLK					
BROADLAND \	/ILLAGES								
Blofield Heath	and Hembling	ton							
NO REASONAE	BLE ALTERNA	TIVE NO	N-RESIDENTIAL S	ITES					
Buxton with La	mas and Bran	npton							
NO REASONAE	BLE ALTERNA	TIVE NO	N-RESIDENTIAL S	ITES					
Cantley									
NO REASONAE	BLE ALTERNA	TIVE NO	N-RESIDENTIAL S	ITES					
Cawston, Bran	diston and Sw	anningt	on						
NO REASONAE	BLE ALTERNA	TIVE NO	N-RESIDENTIAL S	ITES					
Coltishall, Hors	stead with Sta	nningha	II and Belaugh						
			N-RESIDENTIAL S	ITES					
Foulsham and	Themelthorpe								
			N-RESIDENTIAL S	ITES					
Freethorpe, Ha	Ivergate and V	Vickham	pton						
			N-RESIDENTIAL S	ITES					
Frettenham									
NO REASONAE	BLE ALTERNA	TIVE NO	N-RESIDENTIAL S	ITES					
Great and Little	e Plumstead								
NO REASONAE	NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES								
Great Witchingham, Lenwade, Weston Longville, Alderford, Attlebridge, Little Witchingham and Morton on the Hill									
NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES									
Hainford and Stratton Strawless									
NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES									
Hevingham	Hevingham								
	BLE ALTERNA	TIVE NO	N-RESIDENTIAL S	ITES					
Horsford, Felth	orpe and Have	eringlan	d						

NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES

Horsham and Newton St Faith

NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES

Lingwood and Burlingham, Strumpshaw and Beighton NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES

Marsham

NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES

Reedham

NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES

Salhouse, Woodbastwick and Ranworth

Reedham

NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES

South Walsham and Upton with Fishley

NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES

Spixworth and Crostwick

NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES

Unreasonable Sites

Address	Site Reference	Area (Ha)	Proposal	Reason considered to be unreasonable		
BROADLAND VILLAG	E UNREASON		ION-RESIDENTIAL	SITES		
Blofield Heath and He						
NO UNREASONABLE I	NON-RESIDEN	ITIAL S	ITES			
Buxton with Lamas an NO UNREASONABLE		ITIAL S	ITES			
			1120			
Cantley NO UNREASONABLE I	NON-RESIDEN	ITIAL S	ITES			
Cawston, Brandiston a	and Swanning	ton				
NO UNREASONABLE I			ITES			
Coltishall, Horstead w	ith Stanningha	all and l	Belaugh			
NO UNREASONABLE I	NON-RESIDEN	ITIAL S	ITES			
Foulsham and Theme						
NO UNREASONABLE I	NON-RESIDEN	ITIAL S	IIES			
Frettenham						
Adjacent 10 Buxton Road, Frettenham	GNLP2076	0.39	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.		
Freethorpe, Halvergate		-	ITES			
Great and Little Plums	Great and Little Plumstead					

North of Octagon Business Park, Gt & Lt Plumstead	GNLP2107	1.62	Office, storage	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.
East of Brook Farm, Gt & Lt Plumstead	GNLP3034	36.84	Employment B1, B2, B8	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.
Great Witchingham, Lo Witchingham and Mor			gville, Alderford, Att	lebridge, Little
Land North of Council field, Heath Lane (west of Hall Walk), Great Witchingham/Lenwade	GNLP0586	2.94	Open space	This site is not preferred for allocation as there is no evidence of the need for additional open space in Great Witchingham/Lenwade. In addition, the adjacent site promoted for housing is considered to be unreasonable due to highway constraints.

Adjoining Fakenham Road, Attlebridge		1.23	Industrial	This site is proposed for industrial development and would be accessed from the nearby roundabout with the Broadland Northway, however there are concerns about the suitability of the access. The site could potentially provide local opportunities but to justify a local plan allocation in this location more evidence would be needed about the likely end user businesses who would bring forward development.
NO UNREASONABLE I	NON-RESIDEN	ITIAL SI	TES	
Hevingham NO UNREASONABLE			TES	
			120	
Horsford Glebe Farm North, Horsford	GNLP2133	26.23	Employment/mixed	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.

South of Drayton Lane, Horsford Horsham and Newton	GNLP2154	2.30	Retail/car parking	This site is promoted specifically for a supermarket with associated car parking. The site is not preferred for allocation as it is not within an accessible walking distance of Horsford and there is no evidence of an end user being in place to assure delivery of the scheme.
NO UNREASONABLE			ITES	
Lingwood and Burling	ham, Strumps	shaw ar	d Beighton	
NO UNREASONABLE	NON-RESIDEN	ITIAL S	ITES	
Marsham				
NO UNREASONABLE I	NON-RESIDEN	ITAL S	115	
Reedham				
NO UNREASONABLE I	NON-RESIDEN	ITIAL S	ITES	
Salhouse, Woodbastw				
NO UNREASONABLE I	NON-RESIDEN	ITIAL S	IIES	
Spixworth and Crostw	vick			
NO UNREASONABLE		ITIAL S	ITES	
SOUTH NORFOLK VIL	LAGE UNREA	SONAL	BLE NON-RESIDENT	IAL SITES
Bunwell Land at Little Green,	GNLP0224	2.5	Employment	This is a freestanding
Bunwell				site some distance
				from the village core and not particularly
				well related to the
				settlement. There are
				no known end-user
				businesses and
				therefore the site is not considered to be
				suitable for allocation.
Gillingham (including	Haddiscoe)			

Willow Farm.	GNLP0455	0.48	Employment	This is a small remote
Haddiscoe		0110		site located in the
				northern part of the
				parish towards Lower
				Thurlton. It is not
				considered to be
				suitable for allocation
				as it located within
				fluvial flood zones 2
				and 3 and is therefore
				heavily constrained. It
				has been proposed for
				employment uses
				connected to the
				adjacent business and
				would be better to
				come forward through
				the planning
				application process.
Mulbarton (including I	Bracon Ash. E	ast Car	leton, and Hethel)	
Land off Station Lane,	GNLP0245	7.92	Commercial	This site is not
Ketteringham				considered to be
, C				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.
Wymondham Road,	GNLP2165	1.15	Employment	This site is not
East Carleton				preferred for allocation
				as its remoteness to
				core services and the
				inadequacy of the road
				network are significant
Newton Flotman (inclu		\		constraints.

Land West of A140, Adjacent Hickling Lane, Swainsthorpe	GNLP0604R	10.99	Workshops, stores, offices, agricultural sales	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. The site is also subject to a planning application by Ben Burgess agricultural machinery (reference 2018/2631) and would be better dealt with through the development management process.
Seething (including M Land at Seething Airfield, Mundham	undham) GNLP0071R	4.91	Employment	No change in land use proposed, allocation appears unnecessary.
Stoke Holy Cross East of Ipswich Road,	GNLP2158	49.90	Commercial	This site is not
East of Ipswich Road, Stoke Holy Cross	GNLP2158	49.90	Commercial	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.

Tacolneston Conservation Area	GNLP0545	19.68	Preservation as local green space	This site is not considered to be suitable for allocation as a local green space because as submitted it is too large and does not meet the requirements as defined in the National Planning Policy Framework. This proposal would be more appropriate as part of a Conservation Area Appraisal, Local Green Space Designation, or Neighbourhood Plan.
Tacolneston Manor House Area Local Green Space	GNLP0546	6.86	Preservation as local green space	This site is not considered to be suitable for allocation as a local green space because as submitted it is too large and does not meet the requirements as defined in the National Planning Policy Framework. This proposal would be more appropriate as part of a Conservation Area Appraisal, Local Green Space Designation, or Neighbourhood Plan.
Tivetshall St Mary and Former waste transfer station, Tivetshall Wreningham (Includin	GNLP2128	1.8 De)	Retail/petrol station	This site is not considered to be suitable for allocation as to justify a local plan allocation in this location more evidence would be required to demonstrate need and the likely end-user businesses who would bring forward development.

Adjacent Ashwellthorpe Industrial Estate	GNLP2182	6.10	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. Access to the site appears to be
				constrained.

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

Frettenham cluster

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2076 Adjacent 10 Buxton Road, Frettenham (Unreasonable Site – Non Residential)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Frettenham Parish Council	Comment	In favour if footpath along Pound Hill is included		Comments noted.	None
Matthew Hewitt via Nicole Wright (Agent)	Object	There are currently 10 tenants occupying the units on the site. A number of new enquiries received over the past 24 months demonstrate a reasonably high demand for additional spaces for start- ups. A planning application for a mixed- use low carbon scheme at the site is currently being prepared for submission in		To justify a local plan allocation for employment use in this location more evidence would be required about the need for the proposal and how it	None

2020. These include proposals for new footpath links to the village.	would be delivered and this has not been provided through this representation. The promoter states that a planning application for a mixed-use low carbon scheme is being prepared for submission in 2020, including new footpath links to the village but no further details have been provided. A proposal of this scale would probably be better dealt with through the planning application
	application process.

Great and Little Plumstead Cluster

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2107 North of Octagon Business Park, Great and Little Plumstead (Unreasonable Site – Non-residential)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 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
Great and Little Plumstead Parish Council	Support	Comments in support of site being unreasonable: Road network struggling to cope with current traffic on Highbrow Lane and Hospital Road/Water Lane		Comments noted	None
Joe Wiley via Nicole Wright (Agent)	Comment	Zero carbon starter units for small businesses		To justify a local plan allocation for employment use in this location more evidence would be required about the need for the proposal and how it would be delivered and this has not been	None

	p	rovided through
	t	nis
	re	epresentation. A
	p	roposal of this
	S	cale would
	p	robably be better
	d	ealt with through
	tł	ne planning
	a	pplication
	p	rocess.

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP3034 East of Brook Farm, Great and Little Plumstead (Unreasonable Site – Non-residential)
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
Great and Little Plumstead PC	Support	 Comments supporting the site being unreasonable: Roads surrounding site unsuitable for extra traffic. Toad Lane extremely narrow country lane. No exit onto A1270 as 70mph. Broad Lane/Norwich Road junction has very poor visibility 		No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.	None

Horsford, Felthorpe and Haveringland cluster

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2133 Glebe Farm North, Horsford (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
Member of the public	Support	Comment in support of site being unreasonable: This piece of land is far too big to support any employment led development given the current roads surrounding it. The feeder roads onto the NDR struggle now. This would increase that tenfold.		Comments noted. No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.	None

Horsham and Newton St Faith cluster

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Policy HNF2/Site GNLP0466R Land east of the A140 and north of Norwich International Airport, Horsham St Faith (Carried Forward Allocation
TOTAL NUMBER OF REPRESENTATIONS:	5
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 1 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
Member of the Public	Object	 Issues raised: Traffic impacts at NDR junction and traffic congestion. Vehicles use HSF as a bypass to NDR Loss of Semi-Rural feel 	Consider traffic impacts on surrounding area	The principle of the HNF2 allocation has already been agreed through the Broadland Local Plan. No evidence has been submitted to suggest it is undeliverable so it is carried forward unchanged into the GNLP for employment use. The policy does	

				include the need for highway improvements to deal with the traffic generated by the development.	
Member of the Public – 2 people	Comment	 Issues raised: Existing tree belt along boundary has been cut, diminishing the landscape Any development should enhance landscape with a tree belt to act as wildlife corridor, sound and pollution barrier Loss of village surroundings Concerns regarding access improvements 	Consider landscape and conservation impacts	The principle of the HNF2 allocation has already been agreed through the Broadland Local Plan. No evidence has been submitted to suggest it is undeliverable so it is carried forward unchanged into the GNLP for employment use. The policy does include the need for landscaping and highway improvements to address the impacts of the development	
GP Planning Ltd (site promoter)	Support	Supports retention of HNF2 and the change of wording in policy to reflect benefits of proximity to airport.	Consider policy wording to reflect Civil Aviation Authority Guidance	Add appropriate wording to the policy to reflect Civil Aviation	Add additional words to policy requirement about

Anglian Water	Comment	Strongly suggest amendments to the policy wording to reflect the primacy of the CAA guidance to assist in minimising aviation hazards posed by wildlife. Notes accompanying the policy refer to the site being promoted with a larger boundary. This was done to reflect extant policy Guidelines for Development that accepts a slightly larger area for development incorporating land that was safeguarded for Broadland Northway. To avoid future confusion, the landowners and promoters would strongly suggest that the allocation boundary is extended to reflect the full extent of anticipated development. No reference to water	Consider boundary change to reflect full extent anticipated	Authority Guidance. No amendments to the boundary of the carried forward allocation are proposed	landscaping to read: 'Civil Aviation Authority guidance should be followed to ensure aviation hazards posed by wildlife are minimised.
	Comment	efficiency forming part of the design unlike other allocation policies. See comments on Policy 2	approach to water efficiency needed	with under Policy 2 that applies to all sites. It is not necessary to	NOTE

	include it in the	
	allocation policy	

Salhouse

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0157 Land to north of Salhouse Road, Salhouse (Reasonable Alternative, Non-Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 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
Environment Agency (Eastern Region)	Comment	It is not clear what is being proposed at Salhouse Broad (Tourism GNLP0157) near Woodbastwick, if there are to be any changes then a WFD compliance assessment must be undertaken to assess the impacts on ecological elements. The east of the site adjacent to the river is Flood Zone 3 and Flood Zone 2. Part of Flood Zone 3 is also shown to be Flood Zone 3b on our modelling. Ideally all new built		No further information has been provided through the Reg 18C consultation regarding the need for the proposal or exactly what is planned for the site. Therefore there is considered to be no justification for	None

development should be sequentially	allocating the site
sited to be located within the large	for tourism use.
area of Flood Zone 1 on the site.	
However if the tourism uses were	
classed as 'water compatible' then	
this would be an acceptable land	
use within the flood zones,	
including Flood Zone 3b, providing	
that it is designed to: 'remain	
operational and safe for users in	
times of flood; result in no net loss	
of floodplain storage; and not	
impede water flows and not	
increase flood risk elsewhere'.	

South Norfolk village sites

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	GNLP 0604R, Land West of A140, Adjacent Hickling Lane, Swainsthorpe (Newton Flotman Cluster) (Unreasonable Site)
TOTAL NUMBER OF REPRESENTATIONS:	16
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	12 Support, 1 Object, 3 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	GNLP RESPONSE	CHANGE TO PLAN
Ben Burgess Ltd via CODE Development Planners Ltd	Object	Ben Burgess contends that as currently drafted the GNLP would fail when considered against the legal requirements and tests of soundness in accordance with paragraph 35 of the NPPF. Previous representations have demonstrated that the proposal for a new headquarters at Swainsthorpe is deliverable and would constitute sustainable economic development. The GNLP does not explain how the locational requirements of the sector within which Ben Burgess operates have been addressed in accordance with paragraph 82 of the NPPF. Ben	Consideration of soundness issues raised. Request for engagement with GNLP Team prior to Regulation 19 to discuss reasonable alternatives	Issues raised added to Soundness Log. The view remains that the site is better dealt with through the planning application process as there is no identified need to allocate any additional large scale employment sites in the Greater Norwich Local Plan. Evidence	

		Burgess would like to engage with GNLP team ahead of Regulation 19 to identify reasonable alternatives. The evidence base fails to consider the specific requirements of the industry in order to justify the claim "evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich". The decision to designate to the Development Management Process contradicts the very foundation of a policy led planning system. Ben Burgess contend that land west of Ipswich Road, Swainsthorpe should be considered as a preferred option in the GNLP and failure to do so would render the plan unsound. (More detail contained in representation)	shows that currently committed land is more than sufficient in quantity and quality to meet the employment needs in Greater Norwich.	
Members of the Public - various	Comment/ Support	 Comments in support of site being considered unreasonable include: Unjustified to destroy arable fields, landscape, habitats and wildlife Would destroy views of Grade II listed church and wider countryside for villagers 	Support noted	None

 Would contradict South Norfolk Local Landscape Designations Review – Landscape Character Areas and River Valleys in the Norwich Policy Area (2012) Would re-define Swainsthorpe as an adjunct to an industrial complex Will devastate a beautiful Saxon village Will add to congestion on A140 at peak times/terrible transport links. A140 traffic already due to increase due to Long Stratton bousing developments 	
increase due to Long Stratton housing developments.	
A140 has large number of accidents, turning onto A140 currently dangerous.	
 Important road for emergency services which would be affected. Noise pollution would increase for 	
nearby village.Already separate Planning	
 permissions for site (reference 2018/2631 and 2018/2632) Greenfield sites shouldn't be used 	
 when brownfield sites are available for development. Proposal contradicts 2.19 which 	
Proposal contradicts 2.19 which says smaller villages will have	

 appropriately smaller developments. Surface water concerns during winter/wet weather No/limited pedestrian access, potentially dangerous walking/cycling routes to site. Would contradict environmental protection policies. 		
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	GNLP 2128, Former Waste Transfer Station, Tivetshall (Tivetshall St Mary and St Margaret Cluster) (Unreasonable 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	GNLP RESPONSE	CHANGE TO PLAN
FCC Environment Ltd via Agent	Object	Identified discrepancies between the site assessment booklet and the 2018 HELAA addendum. The site was initially scored as 'green' for all constraints except for contamination in the 2018 HELAA. However, the HELAA comparison table in the site assessment booklet scores amber on a number of factors. FCC has reviewed the RAG assessment and considers that the amber scores for access to site, significant landscapes, historic environment and transport and roads should be green	Further investigation into discrepancies between the site assessment booklet and 2018 HELAA addendum Further consideration of implications of lack of brownfield/greenfield assessment in the HELAA	Issue regarding absence of brownfield assessment in the HELAA added to log of soundness issues. The HELAA is based on a Norfolk wide methodology Discrepancies between the HELAA addendum and site assessment booklets are noted and will be investigated through further site	

Not clear from Para 5.10 of HELAA 2017 whether overly cautious technical consultees have affected final RAG assessment or if these have been adjusted. This should be more transparent and adjusted appropriately where needed.Stage 4 of Assessment booklet concludes site not suitable as more evidence needed to prove demand (Presumed to be based off Parish Council comments). High level viability work only appears to have been done for residential developments which raises questions as to the evidence to support this reason to discount the site.FCC maintain the redevelopment of the site is viable/achievable with sufficient market demand particularly as there is a significant amount of growth permitted in Long Stratton to the north. A viability assessment has been undertaken by specialist consultants which concluded there is demand for a variety of commercial uses.Question the level of consideration that has been given to the brownfield	assessment work. However the view remains that the site is better dealt with through the planning application process as there is no identified need to allocate any additional large scale employment sites in the Greater Norwich Local Plan. Evidence shows that currently committed land is more than sufficient in quantity and quality to meet the employment needs in Greater Norwich.
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status of the site. Given that there is no specific criteria relating to brownfield land within the HELAA	
assessment, it is unclear how the council can demonstrate that they	
have considered the use of previously developed land above greenfield development sites.	
Therefore, the soundness of the evidence base documents, and thus, the Local Plan is questioned.	
FCC consider that the site is suitable, available and achievable for redevelopment, and would provide an	
opportunity to redevelop a redundant brownfield site, which national planning policy requires local plans to	
strive to achieve. Thus, the site should be allocated for development within the Local Plan.	

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
Horsham St Faith	n and Newton St	Faith		
Adjacent to Abbey Farm Commercial Park	GNLPSL2007R	4.34	Employment	Settlement Boundary Proposal
North of Abbey Farm Commercial Park	GNLP4061	0.74	Employment	New Site
Swainsthorpe				
West of A140	GNLP0604R	12.31	Employment	Unreasonable
TOTAL		17.39		

STAGE 2 – HELAA COMPARISON TABLE

							Categ	ories						
	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	V/										L — ¥	X	I	
Reference														
					Horsham	St Faith	and New	ton St Fa	aith					
				-										
GNLPSL2007 R	Amber	Green	Amber	Green	Green	Green	Green	Amber	Amber	Green	Amber	Green	Amber	Green
GNLP4061	Amber	Green	Amber	Green	Green	Green	Green	Amber	Amber	Green	Amber	Green	Amber	Green
	Swainsthorpe													
GNLP0604R	Amber	Amber	Amber	Green	Green	Amber	Green	Green	Green	Amber	Green	Green	Red	Amber

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.

Horsham St Faith and Newton

Adjacent to Abbey Farm Commercial Park, GNLPSL2007R, 4.34 ha Employment

GNLPSL2007R comprises land allocated under policy HNF3 in the Broadland Site Allocations DPD. The proposal of GNLPSL2007R is to include the HNF3 allocation within the settlement boundary, and hence the site's treatment as a settlement boundary extension. Given the established nature of the Commercial Park, the proximity and access to the A140, GNLPSL2007R is considered a reasonable alternative.

Horsham St Faith and Newton

North of Abbey Farm Commercial Park, GNLP4061, 0.74 ha, Employment

This is a small extension to the existing Commercial Park that envisages a single new building (and landscaping) to the north of the existing Block L. Given the existing well-established Commercial Park, and the existing HNF3 allocation to the west, this further extension is considered to be a reasonable alternative.

Swainsthorpe

West of A140, GNLP0604R, 12.31 ha, Employment

GNLP0604R was previously not considered to be suitable for allocation as evidence suggests that current land commitments are more than sufficient to meet the employment growth needs of Greater Norwich. The site also remains the subject of a planning application by Ben Burgess agricultural machinery (reference 2018/2631) and would be better dealt with through the development management process. On this basis GNLP0604R is not considered a reasonable alternative for employment-related development.

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
Horsham St Faith and New	vton St Faith		
Adjacent to Abbey Farm Commercial Park	GNLPSL2007R	4.34	Employment
North of Abbey Farm Commercial Park	GNLP4061	0.74	Employment
TOTAL		5.08	

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

Site Reference:	GNLPSL2007R
Address:	Adjacent to Abbey Farm Commercial Park, Horsham St Faith and Newton St Faith
Proposal:	Employment

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA:

Amber Constraints in HELAA

Site access, Utilities Capacity, Significant landscapes, Sensitive townscapes, Historic environment, Transport & Roads

HELAA Conclusion:

This is greenfield land bounded by A140 to the West and Church Street to the South. The site is proposed for Employment uses as an extension to the existing Southwell Road employment area. The site is a proposed enlargement to existing employment allocation HNF3. It is well-related to services and the character of the village. Initial highway evidence has indicated that the site could be considered suitable subject to access via Southwell Road and provision of a cycleway/footway at Church Street, to tie in with the existing facilities to the south and east. There are no concerns over potential flood risk, loss of high quality agricultural land, ecology, contamination or ground stability. However, other constraints include potential impact to the Ancient Monument, landscape character (site borders Horsham Meadows County Wildlife Site), scale of development proposed and noise. There are number of constraints but as these may be possible to mitigate. Removing the area already committed, approximately 0.75ha of the site is concluded as suitable for the land availability assessment. (See also GNLP4061)

For the purposes of the HELAA capacity assessment this site is considered to be: SUITABLE"

FURTHER COMMENTS:

Development Management: The original permission has built out and an application has come forward on the western section (existing allocation HNF3/planning reference 20201787).

Lead Local Flood Authority: Standard information required at a planning stage.

PLANNING HISTORY:

Original Permission 20121385: Erection of Commercial Building (1825sq.m Floorspace) for Class B1 (B) & (C), B2 and B8 Purposes, Associated Links to Blocks F and G, Parking and Servicing Areas, Ancillary Infrastructure and Structural Landscaping Including Earth Bunds, Pedestrian Footway, Minor Works to Trees and Ancillary Works.

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION:

Site form, representation, redline plan

Site Reference:	GNLP4061
Address:	North of Abbey Farm Commercial Park, Horsham St Faith and Newton St Faith
Proposal:	Employment

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA: Amber Constraints in HELAA Site access, Utilities Capacity, Significant landscapes, Sensitive townscapes, Historic environment, Transport & Roads HELAA Conclusion: This is greenfield land located to the north of Abbey Farm Commercial Park, North of Church Street. The site is proposed for Employment uses as a further extension to the existing Southwell Road employment area. It is well-related to services and the character of the village. Initial highway evidence has indicated the site could be considered suitable subject to access via Southwell Road and provision of a cycleway/footway at Church Street, to tie in with the existing facilities to the south and east. There are no concerns over potential flood risk, loss of high-quality agricultural land, ecology, contamination or

ground stability. However, other constraints include potential impact to the Ancient Monument, landscape character (site borders Horsham Meadows County Wildlife Site, scale of development proposed and noise. There are number of constraints but as these may be possible to mitigate. Removing the area already committed, approximately 0.9ha of the site is concluded as suitable for the land availability assessment. (See also GNLPSL2007R)

For the purposes of the HELAA capacity assessment this site is considered to be: Suitable"

FURTHER COMMENTS:

Development Management: The original permission has built out and an application has come forward on the western section (existing allocation HNF3/planning reference 20201787).

Lead Local Flood Authority: Standard information required at a planning stage.

PLANNING HISTORY:

Original Permission 20121385

Erection of Commercial Building (1825sq.m Floorspace) for Class B1 (B) & (C), B2 and B8 Purposes, Associated Links to Blocks F and G, Parking and Servicing Areas, Ancillary Infrastructure and Structural Landscaping Including Earth Bunds, Pedestrian Footway, Minor Works to Trees and Ancillary Works.

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION:

Site form, representation, redline plan

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

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

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating			
Horsham and Newton St Faith							
Land east of the A140 and north of Norwich International Airport, Horsham St Faith	HNF2/ GNLP0466R	35	Employment uses including for those benefitting from a location close to the airport	This site to the east of the A140 and north of Norwich Airport was allocated in the 2016 Broadland Local Plan but has yet to be developed at the base date of this plan. The principle of development on the site has already been accepted and it is expected that development will take place within the new local plan time-period up to 2038. The site is allocated for a full range of employment/commercial development, including those benefitting from a location close to the airport.			
Land at Abbey Farm Commercial, Horsham St Faith	SL2007R/ GNLP4061/ HNF3	4.39	Employment uses (Use Classes E(g) B2, B8)	Site HNF3 at Abbey Farm Commercial was allocated in the 2016 Broadland Local Plan but has yet to be developed at the base date of this plan. The principle of development on the site has already been			

New and revised sites to be considered for allocation:

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
				accepted and it is expected that development will take place within the new local plan time-period up to 2038. The site is re-allocated for employment/commercial development with a small extension to include site GNLP4061, which is already partly built out.

New and revised sites considered to be unreasonable for allocation

Address	Site Reference	Area (Ha)	Proposal	Reason for not allocating				
Newton Flotman (including Swainsthorpe)								
West of A140	GNLP0604R	12.31	Employment	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. The site is also subject to a planning application by Ben Burgess agricultural machinery (reference 2018/2631) and would be better dealt with through the development management process.				

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 16 sites promoted for commercial/employment uses, and four sites for tourism/open space, across the Broadland and South Norfolk villages. The outcome of initial site assessment work (which is detailed in part 1 of this booklet) was to prefer site HNF2/GNLP0466R in Horsham St Faith.

The new site GNLP0466R measures 33.00 ha and is similar in scale to existing allocation HNF2. A key difference with GNLP0466R to the existing allocation is removing the restriction to employment uses benefitting from an airport location. It was concluded that HNF2 is already part of the strategic employment land supply, and so is appropriate to retain; but not on a substantially extended boundary.

Existing non residential allocations in Foulsham, Horsham St Faith, Cawston and Brooke were carried over and included in the Regulation 18 C consultation.

One site (GNLP0157) at Salhouse was consulted on as a reasonable alternative at Regulation 18C as it is already a visitor attraction for sailing, canoeing, walking and camping and it was felt that further information was required regarding the need for the proposal and exactly what is planned for the site.

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 villages, but what was said has been taken into account (see part 2 above). For example, five comments were received about HNF2/GNLP0466R. These comments have been used in the further appraisal of the site.

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

A total of three new or revised sites were submitted through the Regulation 18C consultation. Two of these sites were about revision and expansion of Abbey Farm Commercial Park in Horsham St Faith. The third was a revised proposal for Ben Burgess Ltd to locate to Swainsthorpe.

Each of the sites has been fully reappraised, taking account of the information submitted. For GNLPSL2007R and GNLP4061, due to the established nature of the Abbey Farm Commercial Park, the proposals were considered reasonable.

GNLPSL2007R corresponds with existing allocation HNF3, and GNLP4061 is a small extension the existing Commercial Park.

Whereas the Ben Burgess Ltd proposal at Swainsthorpe is still considered unreasonable. The Swainsthorpe site GNLP0604R measures 10.99 ha and is of a strategic scale in nature. Evidence for the GNLP shows currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich. The site is also subject to a planning application by Ben Burgess agricultural machinery (reference 2018/2631) and is better dealt with through the development management process.

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 (insert link) highlighted a number of negative and positive impacts for non-residential sites across the Broadland and South Norfolk villages.

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 two sites in Horsham St Faith alongside carried forward allocations in Cawston and Foulsham.

The sites in Horsham St Faith, are in most part reallocations but with variations to the site boundaries and policy requirements. HNF2/GNLP0466R is a 35 ha strategic employment site; the principle of which is already set in existing plans. However, the requirement "to demonstrate a significant specific benefit from a use being located near the airport" is removed.

Also, in Horsham St Faith, SL2007/GNLP4061/HNF3 is in essence an existing employment allocation; the principle for which is set in the previous local plan. However, the site boundary is slightly expanded and policy requirements are updated. The changes reflecting recent development on part of the site and giving opportunity for enhanced landscaping.

As to the South Norfolk villages, one site is reallocated. BKE 3 in Brooke is still strategically relevant, and with policy wording updates is suitable to reallocate.

The site in Salhouse (GNLP0157) which was consulted on as a reasonable alternative at Regulation 18C is not allocated as no further information was provided through the consultation regarding the need for and nature of the plans. It was concluded that on that basis an allocation for tourism purposes is not integral to achieving the GNLP's strategic objectives.

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.