

Settlement Name:	Sprowston
Settlement Hierarchy:	<p>Sprowston forms part of an area identified for significant growth in the JCS referred as the Old Catton, Sprowston Rackheath, Thorpe St Andrew Growth Triangle where land is allocated through the OSRT Growth Triangle AAP. (NB the GNLP will not supersede the AAP document – the allocations at GT16 – GT19 are therefore not part of this plan). Sprowston is classified as an urban fringe parish in the emerging Greater Norwich Local Plan.</p> <p>Sprowston is major suburb to the north of the Norwich, with which it shares its southern boundary. The three wards that make up the town council area have a total population of approximately 14,000. The OSRT GT as a whole has a commitment of around 12,500 including around 6,000 in Sprowston. The Towards a Strategy Document indicates potential 200 dwellings as an indicative figure for new allocations in the north east sector, which includes Rackheath, Sprowston and Thorpe St Andrew. It also states that as part of a contingency plan land adjacent to the current White Woman Lane development could be considered for around 1,200 dwellings, but assumes no net impact on OSRT GT delivery pre-2036 given current commitment in the area. There is a total of 20 additional dwellings with planning permission on small sites at the base date of the plan.</p> <p>Sprowston has a good range of services and facilities, principally based around the designated district centre at Blue Boar that is anchored by a Tesco supermarket. There is primary and secondary school provision as well as recreational and health facilities within the area.</p> <p>The Sprowston Neighbourhood Plan to 2026 does not make any housing allocations however it does state that when the Park and Ride is relocated the current site should be redeveloped for appropriate uses that complement the area. In addition, the area at Harrison’s Plantation is identified for a woodland activity park and open areas near Barker’s Lane / Church Lane are retained for a network of green spaces to create a ‘green heart’ for the community.</p>

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

STAGE 1 – COMPLETE LIST OF SITES PROMOTED IN THE SETTLEMENT

LIST OF SITES TO BE CONSIDERED FOR RESIDENTIAL/MIXED USE ALLOCATION (0.5 HECTARES OR LARGER)

Address	Site Reference	Area (ha)	Proposal
Sprowston			
Land at Rear of Hill Farm House, Wroxham Road	GNLP0042	4.28	Residential (unspecified number)
Land off Blue Boar Lane/Salhouse Road, White House Farm	GNLP0132	66.78	Approx. 1,226 dwellings including public open space, sports pitches, landscaping etc.
Lushers Loke	GNLP2178	0.91	25 dwellings
Total area of land		71.97	

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

Address	Site Reference	Area (ha)	Proposal
None			

(Sites of less than 0.5ha are not considered suitable for allocation and therefore have not been assessed in this booklet. These sites will be considered as part of a reappraisal of settlement boundaries to be published with the Regulation 19 Submission version of the Plan).

LIST OF SITES SUBMITTED FOR OTHER USES

Address	Site Reference	Area (ha)	Proposal
Sprowston			
Sprowston Park and Ride, Wroxham Road	GNLP0383	5.19	High School (or, if not required for this purpose, Residential development of approx. 150 dwellings).
White House Farm	GNLP3024	6.04	Multi Use Community Hub

(Sites submitted for other uses are considered in separate 'Non-Residential' Site Assessment booklets and therefore have not been assessed in this booklet).

STAGE 2 – HELAA COMPARISON TABLE

RESIDENTIAL/MIXED USE

	Categories													
	Site access	Access to services	Utilities Capacity	Utilities Infrastructure	Contamination/ ground stability	Flood Risk	Market attractiveness	Significant landscapes	Sensitive townscapes	Biodiversity & Geodiversity	Historic environment	Open Space and GI	Transport & Roads	Compatibility with neighbouring uses
Site Reference														
	Sprowston													
GNLP0042	Amber	Amber	Green	Green	Green	Green	Green	Amber	Amber	Amber	Amber	Green	Amber	Amber
GNLP0132	Green	Green	Green	Green	Amber	Amber	Green	Amber	Green	Amber	Green	Amber	Amber	Green
GNLP2178	Amber	Green	Amber	Green	Amber	Amber	Green	Green	Green	Green	Green	Green	Amber	Amber

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

Site Reference	Comments
Sprowston	
GNLP0042	<p>General comments The site is isolated from any community and the access point would be on a blind bend. The land is a buffer zone between the NDR and the proposed development at Beeston St Andrew and Sprowston.</p> <p>Sprowston Town Council comments Sprowston Town Council are opposed to this site (GNLP0042) due to its isolation from any existing communities.</p>
GNLP0132	<p>General comments The site is suitable, available and viable and represents a sustainable location for growth. Evidence demonstrates there are no constraints to delivery.</p> <p>Norfolk Wildlife Trust comments The allocation should allow for the protection and enhancement of GI corridor.</p>
GNLP2178	No comments submitted

STAGE 4 – DISCUSSION OF SUBMITTED SITES

In this section sites are assessed in order to establish whether they are suitable for allocation. For the purposes of Sustainability Appraisal, suitable sites are those which are considered to be Reasonable Alternatives. Sites not considered suitable for allocation are not realistic options and therefore are not considered to be reasonable alternatives. The discussion below outlines the reasons why a site has been deemed suitable or unsuitable for allocation. By association this is also the outline of the reasons why a site was deemed to be a reasonable or unreasonable alternative.

A range of factors have been taken into account to establish whether a site should, or should not, be considered suitable for allocation. These factors include: impact on heritage and landscape; impact on the form and character of the settlement; relationship to services and facilities; environmental concerns, including flood risk; and, in particular, a safe walking route to a primary school. Sites which do not have a safe walking route to school, or where a safe walking route cannot be created will not be considered suitable for allocation.

Conclusions in regard to a sites performance against the relevant factors have also been informed by the outcomes of the HELAA, as set out under stage 2, consultation responses received, as summarised in stage 3, and other relevant evidence.

Three sites are proposed for residential development. Taking account of the comments received, existing commitment, achieving safe access to school, and constraints set out in the HELAA including those highlighted below, the following sites are considered to be reasonable alternatives:

GNLPO132

This is a large greenfield site off Salhouse Road adjacent a major allocation for mixed uses within an area where significant growth is expected. It is promoted for approx. 1,226 dwellings including public open space, sports pitches, landscaping etc. In addition, it is next to historic parkland and part of the site is within ancient woodland (Bulmer Coppice) an important green infrastructure feature that should be protected. Norfolk Wildlife Trust has commented that the allocation should allow for the protection and enhancement of the green infrastructure corridor. The site is set to benefit from the link road already under construction, and bus rapid transit (BRT) route. Other constraints include flood risk and ecological impacts, plus concerns over safe access to school.

Sites not considered to be reasonable alternatives are:

GNLPO042

This site is greenfield land off Wroxham Road, within an area allocated for landscape buffer and primary GI Corridor (policy GT2 which is not subject to this consultation) between Sprowston and Rackheath, beyond the settlement and existing commitment. It is therefore considered remote, disconnected from services and

unsympathetic to the character of the area. Furthermore, it is adjacent to ancient woodland (Sprowston Wood) and opposite historic parkland (Rackheath Park) therefore significant ecology and landscape character constraints exist.

GNLP2178

This site at Lushers Loke is a vacant employment site (a builders yard) promoted for 25 dwellings. To the north of the site is residential development and to the south the site borders a light industrial employment site which may not be compatible with this proposal. Local road capacity and lack of footpath provision are concerns. There is also is high risk of surface water flooding in the south east portion of the site.

STAGE 5 – SHORTLIST OF REASONABLE ALTERNATIVE SITES FOR FURTHER ASSESSMENT

Based on the assessment undertaken at stage 4 above the following sites are considered to be reasonable alternatives.

Address	Site Reference	Area (ha)	Proposal
Sprowston			
Land off Blue Boar Lane/Salhouse Road, White House Farm	GNLP0132	66.78	Approx. 1,226 dwellings including public open space, sports pitches, landscaping etc.
Total area of land		66.78	

STAGE 6 – DETAILED SITE ASSESSMENTS OF REASONABLE ALTERNATIVE SITES

Site Reference:	GNLP0132
Address:	Land off Blue Boar Lane/Salhouse Road, White House Farm
Proposal:	Approx. 1,226 dwellings including public open space, sports pitches, landscaping etc.

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural with woodland area	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
<p>Amber Constraints in HELAA Contamination and Ground Stability, Flood Risk, Significant Landscapes, Biodiversity and Geodiversity, Open Space and GI, Transport and Roads</p>
<p>HELAA Conclusion This is a large greenfield site off Salhouse Road adjacent a major allocation for mixed uses within an area where significant growth is expected. In addition, it is next to Historic Parkland and part of the site is within Ancient Woodland (Bulmer Coppice) an important green infrastructure feature that should be protected. The site is set to benefit from the link road already under construction, and BRT route and so access is deemed possible. The access is likely to be dependent on allocations nearby and BRT route proposed and impacts on the local highway network could be mitigated. There are no concerns over contamination, or loss of high quality agricultural land. Other constraints include small sections within low risk of surface water flooding, Great Crested Newts have been found in the vicinity, further investigations will be necessary. There are number of constraints but as these may be possible to mitigate the site is concluded as suitable for the land availability assessment.</p>

FURTHER COMMENTS
<p>Highways Yes. Subject to acceptable access strategy and sustainable links (approx. 1226 dwellings)</p> <p>Development Management Subject to a well planned development the site raises no significant issues. Key constraints are landscape, heritage, connectivity and access to services.</p> <p>Minerals & Waste</p>

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

Lead Local Flood Authority

Few or no constraints. Standard information required at planning stage. RoSWF mapping indicates that the site is free from flood risk in the 3.33% and 1% return periods. Mapping indicates the potential for some isolated ponding to occur in the 0.1% event associated with an existing pond on the site, and with the watercourse on the western boundary of the site. Our records indicate that we have been consulted on a number of planning applications around the site, but none for this plot. There is a watercourse shown on mapping on the western boundary of the site but further work would be needed to demonstrate that it is connected to the wider watercourse network. Given the location, surface water sewer connections may not be available and so ultimately the site may be reliant on the results of infiltration testing.

PLANNING HISTORY:

Not known

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

- Archaeological Desk Based Assessment
- Ecology Appraisal and Strategic Assessment
- Pre-Planning Water and Used Water Report
- Flood Risk and Surface Water Drainage Strategy
- Highways Access Appraisal
- Tree Survey
- Utilities Location Plan
- Preliminary Geo-Environmental Risk Assessment
- Vision and Delivery Document

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

One reasonable alternative site has been identified in Sprowston at stage 5 of this booklet. This site was considered to be worthy of further investigation to look at its potential for allocation as the initial assessment did not flag up any major constraints that would preclude development. It has been subject to further discussion with Development Management, Highways, Flood Authority and Children’s Services in order to identify preferred sites for allocation and their comments are recorded under stage 6 above.

The current local plan identifies Sprowston as part of the OSRT Growth Triangle. The OSRT GT AAP as a whole has a commitment of approx. 12,500 dwellings, including approx. 6,000 in Sprowston. (NB the GNLP will not supersede the AAP document – the allocations GT2 - 20 are therefore not available for comment in the GNLP public consultation).

Sprowston is an Urban Fringe parish in the north-east sector. The ‘Towards a Strategy’ document identifies an indicative allocation for 200 dwellings across this sector, with the possibility of a 1,200 dwelling contingency site at White House Farm (site GNLP0132). Through further discussion GNLP0132 was identified as the most suitable site to allocate for 1,200 dwellings, bringing the contingency site in as a preferred site. The reason for this is due to the extension of the plan period to 2038 with the subsequent requirement for additional dwellings and the fact that phase 1 development is nearing completion, with this allocation enabling phases 2 and 3 to come forward. There is considered to be no reasonable alternative to this approach.

In conclusion there is one site identified as a preferred option in Sprowston providing for 1,200 new homes. There is a total of 20 additional dwellings with planning permission on small sites. This gives a total deliverable housing commitment for Sprowston of 7,220 homes between 2018 – 2038. (NB the previous allocations GT2 – GT20 are carried forward allocations but the AAP sites are not available for comment).

Preferred Sites:

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Sprowston				
Land off Blue Boar Lane/ Salhouse Road, White House Farm	GNLP0132	66.78	1,200 dwellings	This is a large strategic scale greenfield site off Salhouse Road adjacent to a major existing allocation within the North East Growth Triangle. There are no major constraints to make the site unsuitable for development, therefore subject to an acceptable access

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
				strategy and masterplan the site is preferred for allocation. The option for the site to incorporate a well-located High School will be investigated further for the submission version of the Plan.

Reasonable Alternative Sites:

Address	Site Reference	Area (ha)	Promoted for	Reason for not allocating
Sprowston				
NO REASONABLE ALTERNATIVE SITES				

Unreasonable Sites:

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
Sprowston				
Land at Rear of Hill Farm House, Wroxham Road	GNLP0042	4.28	Residential (unspecified number)	This site is not suitable for allocation as it is located beyond the settlement and existing commitment. It is considered to be remote, disconnected from services and unsympathetic to the character of the area.
Lushers Loke	GNLP2178	0.91	25 dwellings	This is a brownfield site bordering a light industrial employment site which may cause compatibility issues. There are concerns about road capacity and lack of footpath provision and there is a high risk of surface water flooding in the south east portion of the site. As it is located within the built-up area it could come forward through the planning application process so it is not considered for allocation in the local plan.

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

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Sprowston – Site Assessment Booklet (General Comments)
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
Sprowston Town Council	Comment	Correction on a number of factual inaccuracies in the "draft gnlp sites, sprowston site assessment booklet : Sprowston has three wards not two as stated, there is not a designated district centre housing allocations <u>were</u> included in the Sprowston Neighbourhood Plan - See Policy 18.		Take account of comments when updating the site assessment booklet	Amend the Sprowston site assessment booklet as appropriate

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0132 Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston (Preferred Site).
TOTAL NUMBER OF REPRESENTATIONS:	9
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	4 Support, 1 Object, 4 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Sprowston Town Council	Support	Supports that this site should be classified as a preferred residential site		Support noted	None
Hopkins Homes, Persimmon Homes and Taylor Wimpey Bidwells	Support	Support the preferred allocation of GNLP0132, Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston. Policy wording should be adjusted to indicate that 1200 units is a minimum figure, and flexibility introduced in relation to affordable housing.		Support noted Correct errors identified in the policy	Update policy wording as appropriate.

		In all other respects, the requirements of the policy are considered generally appropriate. For accuracy, in the second bullet point, 'Mallard Way' should be replaced with 'Atlantic Avenue'. Similarly, the final bullet point contains a typing error and the word 'approached' should be replaced with 'approved'.			
Mr Oliver Gurney/ Mrs Nicole Wright	Support	On behalf of client White House Farm supports this proposed housing allocation. It will be important to secure a strategic buffer around White House Farm in the masterplan proposals for this allocation.		Comment noted. The additional buffer is not considered appropriate or justifiable. The matter is adequately addressed by Policy 3 (and policies in the Development Management DPD)	None
Historic England	Support	Although Rackheath Hall, grade II listed lies to the east of the site, the intervening vegetation should provide a suitable buffer. We welcome the		Comments noted	None

		reference to the historic parkland and need for protection of trees in bullet point 5.			
Norfolk Wildlife Trust	Comment	This site includes an area of ancient woodland in the south-west corner of the proposed allocation. This area should be safeguarded through sufficient buffering (at least 50m, preferably 100m, in line with Woodland Trust guidance). It should be accompanied by an ecological appraisal, with provision of biodiversity net gain (potentially also delivering contributions to green infrastructure).		Review policy wording to ensure area of Ancient woodland within the site is protected and safeguarded from development Provision of biodiversity net gain covered by strategic policies	Amend site policy as appropriate
Environment Agency	Comment	Sites such as this which intersect water courses should undertake a WFD compliance assessment for the watercourse receiving the runoff, maintain a buffer of 20 m between the watercourse and gardens and secure opportunities for riparian habitat restoration.		Review policy wording	Add policy requirement to read: 'This site intersects watercourses so a WFD compliance assessment will be required for the watercourse receiving the

					runoff. A buffer of 20m will need to be maintained between the watercourse and gardens and opportunities for riparian habitat restoration should be secured'.
The Woodland Trust	Object	Concerned about the potentially adverse impacts will have in relation to an area of ancient woodland known as Bulmer Coppice. Ancient woodland should not be included in areas that are allocated for development, whether for residential, leisure or community purposes as this leaves them open to the impacts of development. For this reason, we believe the site is unsound and should not be taken forward.		The policy will be revised to take account of the area of Ancient Woodland within the site to ensure it is protected and safeguarded from development	Amend site policy as appropriate

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0042 Land at Rear of Hill Farm House, Wroxham Road, Sprowston (Unreasonable 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
Sprowston Town Council	Support	Support that this site should be classified as an unreasonable residential site. As its too remote, outside the current settlement boundary, and not well served by public transport or other necessary infrastructure.		Comment noted	None
Arnold Keys on behalf of clients	Object	We seek the identification of site GNLP0042 (Land at rear of Hill Farmhouse, Wroxham Road) as a 'Preferred Housing Allocation' in the GNLP. An HELAA RAG assessment has been		This site is not considered to be suitable for allocation as it is located beyond the settlement and existing commitment. It is	None

		undertaken to demonstrate that the site is available, achievable and suitable for allocation.		considered to be remote, disconnected from services and unsympathetic to the character of the area.	
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2178 Lushers Loke, Sprowston (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Sprowston Town Council	Object	OBJECTS to this site being classified as an UNREASONABLE RESIDENTIAL SITE Council strongly opposes the suggestion that this is an unreasonable site for residential development and fully supports its inclusion instead as a PREFERRED RESIDENTIAL SITE. For further info see additional info.		This site is not considered to be suitable for allocation due to concerns about road capacity and lack of footpath provision. There is also a high risk of surface water flooding in the south east portion of the site. As it is located within the built up area it could come forward through the	None

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

No new or revised sites submitted through the Regulation 18C consultation.

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 3 sites promoted for residential/mixed use in Sprowston totalling nearly 72 hectares of land. The outcome of initial site assessment work (which is detailed in part 1 of this booklet) was to prefer site GNLP0132 as a strategic allocation for 1200 dwellings. The site was favoured due its strategic scale to contribute towards meeting the housing numbers identified for the urban fringe and its location adjacent to an existing allocation with the North East Growth Triangle. The site has no major constraints. The other sites were rejected as one was considered to be too remote and would result in a disconnected and unsympathetic development and the other was considered to have highway and flooding concerns.

Summary of comments from the Regulation 18C draft plan consultation

Through the Regulation 18C consultation a number of comments were received regarding sites in Sprowston (detailed in part 2 above). The main comments received were in relation to the preferred site including the need to protect the nearby historic environment and ancient woodland on site. These comments have resulted in the policy wording being strengthened but did not result in any changes to the selection of the site preferred for allocation. Further discussions have taken place with Norfolk County Council regarding the need for a high school on site and as a result the policy wording has been changed to require a 10 hectare site to be safeguarded for a high school.

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

There were no new or revised sites submitted through the Regulation 18C consultation.

Sustainability Appraisal

The sustainability performance of each reasonable alternative site has been considered in the selection of sites. The Sustainability Appraisal includes a scoring and assessment narrative on the sustainability performance of each reasonable alternative and recommendations for mitigation measures which have been incorporated in to policy requirements as appropriate. The Sustainability Appraisal (which can be found in the evidence base [here](#)) highlighted a number of negatives scores for site GNLP0132 but it is considered that due to the size of the site a number of these will be overcome by development and can be mitigated for through policy requirements and the design of development. For example the presence of ancient woodland can be mitigated through careful design and layout and the negative score for education will be mitigated by the provision of a new high school on the site.

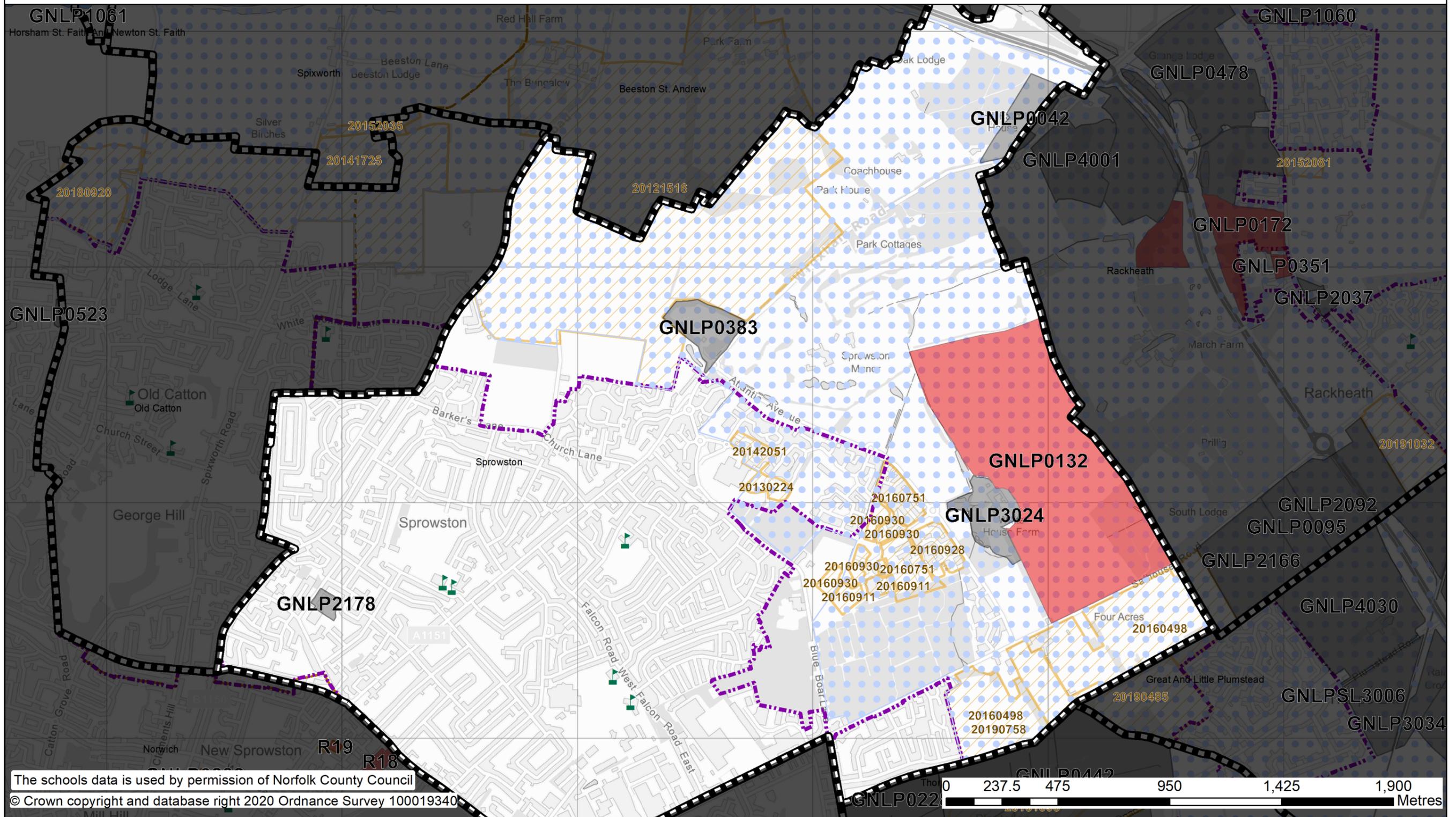
Final conclusion on sites for allocation in the Regulation 19 Plan

Based on all the information contained within this booklet the final conclusion of the site assessment process for Sprowston is to allocate site GNLP0132 as a strategic site for 1200 dwellings.

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

SPROWSTON

GREATER NORWICH LOCAL PLAN PROMOTED SITES BY SCHOOL CATCHMENT AREAS



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-  Primary School
-  Housing Allocation
-  Not Allocated
-  Settlement Boundary
-  Parish Boundary
-  Primary School Catchment (2018-19)
-  Aviation Related Employment Allocation
-  Growth Triangle Area Action Plan Boundary
-  Commitment*


 N
 1:15,000
 at A3
 Date: 25/11/2020

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