e centre in the Greater h neighbouring ol, primary school, nd library.
as 'made' in March The vision for the Vroxham parish to de community. It will to meet strategic and vices, effective traffic ses, developed in tation and the
no allocations to be tre. There are mission on small sites.
document identifies be provided between 3. This site the sites promoted in most suitable to on figure for the Key

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
	Wroxham		
Wroxham Football Club, Trafford Park, 35, Skinners Lane	GNLP0041	1.81	20 dwellings
East of Salhouse Road	GNLP2131	5.54	100 dwellings
South of Wherry Gardens	GNLP2135	5.90	100 dwellings
Total area of land		13.25	

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

Address	Site Reference	Area (ha)	Proposal
None			

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

LIST OF SITES SUBMITTED FOR OTHER USES

Address	Site Reference	Area (ha)	Proposal
None			

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

STAGE 2 – HELAA COMPARISON TABLE

RESIDENTIAL/MIXED USE

							Categ	jories						
	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														
						W	roxham							
GNLP0041	Amber	Amber	Amber	Green	Green	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
GNLP2131	Amber	Green	Amber	Green	Green	Green	Green	Amber	Amber	Amber	Amber	Green	Amber	Green
GNLP2135	Amber	Amber	Amber	Green	Green	Green	Green	Amber	Amber	Green	Green	Green	Amber	Green

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

Site	Comments
Reference	
	Wroxham
GNLP0041	General comments Objections raised concerns regarding the development being out of character of the peaceful retirement area, traffic congestion, road safety, lack of footpaths, no proper drainage, surface water runoff, site is within the domain of the Broads Authority, access issues and it is a conservation area.
	The Norfolk FA is fully supportive of the relocation of Wroxham Football Club to a new site, as identified within the GNGB Playing Pitch Strategy.
	One comment in support of site. A good location for a development of a good size for a small village. Football club current location is inappropriate for numbers of fans.
	Sports England comments Sport England would not object to the relocation of Wroxham Football Club, provided a suitable replacement facility was provided which satisfies exception E4 of Sport England's playing fields policy, and para 74 of the NPPF.
	Broads Authority comments Where would the current football club go? This might also visually impact on the Broads landscape and the existing Wroxham Conservation Area - early discussion about this would be welcomed. This site is also within the Wroxham Conservation Area.
	Wroxham Parish Council comments The village does not require another speculative development of larger family detached dwellings. Wroxham is overwhelmingly chosen by its residents as a retirement village and has a population substantially older than most similar sized communities in the GNLP area. We have an urgent demand for retirement properties, bungalows and apartments in the village for existing residents to downsize into while they remain in the village. This would help free up sizeable properties in the heart of Wroxham currently occupied by one or two elderly people. This site would be ideal for this purpose.
GNLP2131	General comments One comment in support of site. The Council's assessment does not identify issues which would preclude development on the site and concludes that the development is suitable. However, given that it overlaps with the previously submitted site GNLP0504 it is marked as unsuitable. The originally submitted site has been superseded by

	option GNLP2131 and GNLP2135 following discussions with the Parish Council and landowner and therefore it should take precedence over GNLP0504.
	Norfolk FA comments Norfolk FA are supportive of residential development in Wroxham, on the proviso of open space infrastructure associated to this development taking into consideration strategic local football infrastructure needs. Wroxham FC have been identified for a relocation within the existing PPS
	 Wroxham Parish Council comments 1) South of Wherry Gardens build on an existing community. 2) This site destroys vista that form the character of the village. 3) Unsustainable traffic access
	Salhouse Parish Council comments Considering the proposed sites for Wroxham, site number GNLP 2135 lies between the Salhouse/Wroxham road and the railway line, and is only 'a field away' from the Salhouse parish boundary. This would be a massive expansion (more than 100%) of the existing recent Wherry Gardens development, and it would have a huge visual impact on the character of the rolling landscape in this area as it would be visible from a considerable distance from both the road and rail. It would also leave Salhouse hemmed in by development on the Wroxham side, especially if site no. GNLP 2131 on the east side of the road also goes ahead. Development of site 2135 in particular would conflict with Policy 2 of the JCS as it would fail to maintain the strategic gap between the communities of Wroxham and Salhouse and damage the landscape settings of the two villages and their approaches. This development would also conflict with Broadland Policy EN 2 Landscape which refers to the local Landscape Character Assessment and the protection of gaps between settlements, particularly in this case the valley forms of the river Bure and unique geological/geomorphological landforms in this area, which need appropriate protection.
GNLP2135	General comments One comment in support of site. The site can deliver a quality development to assist in meeting the significant development needs in the District, including affordable housing needs. There is also potential to provide new areas of open space. The council's assessment concludes that the site is suitable for residential development. We agree with this conclusion as there are no constraints which would preclude development.
	Salhouse Parish Council comments Considering the proposed sites for Wroxham, site number GNLP 2135 lies between the Salhouse/Wroxham road and the railway line, and is only 'a field away' from the Salhouse parish boundary. This

would be a massive expansion (more than 100%) of the existing recent Wherry Gardens development, and it would have a huge visual impact on the character of the rolling landscape in this area as it would be visible from a considerable distance from both the road and rail. It would also leave Salhouse hemmed in by development on the Wroxham side, especially if site no. GNLP 2131 on the east side of the road also goes ahead. Development of site 2135 in particular would conflict with Policy 2 of the JCS as it would fail to maintain the strategic gap between the communities of Wroxham and Salhouse and damage the landscape settings of the two villages and their approaches. This development would also conflict with Broadland Policy EN 2Landscape which refers to the local Landscape Character Assessment and the protection of gaps between settlements, particularly in this case the valley forms of the river Bure and unique geological/geomorphological landforms in this area, which need appropriate protection.

Broads Authority comments

Site is extension to existing new development and remote from Broads, with no visibility from Broads area. Unlikely to impact adversely on Broads in terms of heritage. Suggest that pedestrian cycle access from Salhouse Road and along Salhouse Road should be provided

Norfolk FA comments

Norfolk FA are supportive of residential development in Wroxham, on the proviso of open space infrastructure associated to this development taking into consideration strategic local football infrastructure needs. Wroxham FC have been identified for a relocation within the existing PPS.

Wroxham Parish Council comments

Firstly to create a more viable community for Wherry Gardens by the creation of additional public spaces, community facilities and a public crossing as part of this scheme. The Council would insist on the relocation of the existing 30mph zone on the Salhouse Road to sit outside the boundary of this proposed development. This would enhance the public realm in the southern end of the village. Secondly as part of the Neighbourhood Plan consultation there was strong public support for development to take place south of Wherry Gardens (pp23).

STAGE 4 – DISCUSSION OF SUBMITTED SITES

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

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

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

The Greater Norwich Local Plan classifies Wroxham as a Key Service Centre due to the services shared with Hoveton. Development options for expanding the village are limited to sites at the south. The River Bure divides Wroxham from Hoveton, the railway runs north to south along the western edge of Wroxham, and the village is surrounded by ecologically important Broads habitat and landscapes. The farmland to the south-west of the village is classed as Grade 3 in the Agricultural Land Classification map, whilst that to the south-east, east of Salhouse Road is Grade 2, and so under the sequential approach sites that were Grade 3 would be preferred for this factor. Traffic issues on the A1151 in Wroxham and in the centre of Hoveton where there are particular air quality issues, will need to be taken into consideration in determining the scale of development.

In total three sites have been promoted, GNLP2131 and 2135 are adjacent to the existing allocation for 100 dwellings (reference WRO 1 / 20130965), known as Wherry Gardens which is now completed. There is a petrol station and shop nearby, but most facilities are at least 1 kilometre away in the direction of Hoveton. The three sites have some 'amber' constraints in the HELAA, such as over site access, the road network, townscapes and landscape impacts, and proximity to ecological important designations. Both GNLP2131 and 2135 will have landscape impacts, particularly GNLP2135 which would result in a significant southward elongation of the built up area into the open countryside. Development on GNLP2135 would also be the furthest distance for access to services. However, these two sites are regarded as reasonable alternatives to go forward for more detailed assessment.

GNLP0041 remains in active use for Wroxham Football Club, and although a potential replacement site has been identified by the promoter this is not definite. Also, relocating the football club would require substantial investment, likely to be significantly more than would be achieved by the Football Club from redevelopment of the ground. Given this situation, there is not a reasonable likelihood that the proposed residential development would take place and so an allocation would not be justified. Therefore, site GNLP0041 is <u>not</u> regarded as a reasonable alternative to go forward for more detailed assessment as an allocation. However, given that the site is already developed, containing the football stadium, car park, clubhouse etc, it forms part of the built-up area. As such there is a case for its inclusion in the settlement limit and it is identified for further assessment for this. However, settlement limits are not under consideration at this stage of the draft GNLP, but will be addressed for the Regulation 19 version of the plan.

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
	Wroxham		
East of Salhouse Road	GNLP2131	5.54	100 dwellings
South of Wherry Gardens	GNLP2135	5.90	100 dwellings
Total area of land		11.44	

STAGE 6 – DETAILED SITE ASSESSMENTS OF REASONABLE ALTERNATIVE SITES

Site Reference:	GNLP2131
Address:	East of Salhouse Road
Proposal:	Residential development (100 dwellings proposed)

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA

Amber Constraints in HELAA

Access, Utilities Capacity, Significant Landscape, Townscapes, Biodiversity & Geodiversity, Historic Environment and Transport & Roads.

HELAA Conclusion

The site 5.5 ha is located east of Salhouse Road. There are potential access constraints on the site as a result the Highway Authority has highlighted that the development would be required to provide improvements to the Salhouse Rd and Keys Drive junction. The site is near to the Broads National Park and additionally the north east of the site is Grade 2 agricultural land. Other site constraints include close proximity to two Grade II listed buildings. The site is in close to a tree preservation order at Broad Farm, the site also adjacent to two veteran trees and a designated species site, mitigation is required to offset the impacts. There is no flooding risk to the site. The site is concluded as suitable for the land availability assessment, however as it complete overlaps with site GNLP0504 which was assessed as part of the original HELAA it will not contribute any additional capacity for the purposes of this addendum and will therefore be marked as unsuitable.

FURTHER COMMENTS

Highways

Yes. Subject to rationalisation of Salhouse Road junction with Preston Close and Keys Drive, along with acceptable access strategy including visibility, carriageway widening, frontage footway and speed limit revision.

Development Management

Access arrangements unclear and need further explanation to demonstrate how this would be achieved - if via B1140 it may result in loss of 2 significant mature trees. Will have some landscape impact on gateway to town from south. Site also significant distance from primary school (in Hoveton) and other services.

Minerals & Waste

No safeguarded mineral resources.

Lead Local Flood Authority

No comments.

PLANNING HISTORY:

No relevant history

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

• Site layout plan

Site Reference:	GNLP2135
Address:	South of Wherry Gardens
Proposal:	Residential development (100 dwellings proposed)

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA

Amber Constraints in HELAA

Access. Accessibility to Services, Utilities Capacity, Significant Landscapes, Townscapes and Transport & Roads.

HELAA Conclusion

The 5.96 ha site is located south of Wherry Gardens. There are potential access constraints on the site, as a result the Highway Authority has highlighted that the development would be required to provide improvements to the Salhouse Rd and Keys Drive junction. The site is near to the Broads National Park which is an area sensitive to development due to its numerous environmental designations. Although there are a number of constraints the site is concluded as suitable for the land availability assessment.

FURTHER COMMENTS

Highways

No. Unbalanced development frontage, would require inappropriate extension to speed limit, could lead to unsatisfactory levels of compliance. Visibility requirements would be excessive to mitigate risk.

Development Management

Site has similar issues to 2131 but townscape issues more pronounced. Access issues need further consideration - preferable to be taken through existing new estate but presumably highways would want second point of access.

Minerals & Waste

No safeguarded mineral resources.

Lead Local Flood Authority

No comments.

PLANNING HISTORY:

No history

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

• Site layout plan

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

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

Wroxham is a Key Service Centre and the 'Towards a Strategy' document identifies a requirement for 400-600 dwellings across this sector of the hierarchy. During further discussion, traffic constraints and the proximity to the Broads have been identified as constraints. Therefore there are no preferred sites in Wroxham and there is no reasonable alternative to this approach to housing growth.

Therefore in conclusion there are no new allocations proposed and no allocations to be carried forward in this key service centre. There are however 4 dwellings with planning permission on small sites.

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Wroxham				
NO PREFERRE BROADS REST			ONSTRAINTS	AND PROXIMITY TO THE

Preferred Sites:

Reasonable Alternative Sites:

Address	Site Reference	Promoted for	Reason for not allocating
Wroxham			
NO REASONABL TO THE BROADS			CONSTRAINTS AND PROXIMITY

Unreasonable Sites:

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
Wroxham Football Club, Trafford Park 35 Skinners Lane	GNLP0041	1.81	20 dwellings	The site remains in active use for Wroxham Football Club and although a potential replacement site has been identified this is not definite. Relocating the football club would require substantial investment, likely to be significantly more than would be achieved by redevelopment of the current ground and for that reason the site is considered to be unreasonable for allocation at the current time. In addition, traffic constraints and proximity to the Broads restricts additional growth in Wroxham.
East of Salhouse Road	GNLP2131	5.54	100 dwellings	This site could have potential for allocation subject to rationalisation of the Salhouse Road junction with Preston Close and Keys Drive, along with an acceptable access strategy. There is a safe route to school, although the site is at the limits of an acceptable distance. However. the site is not considered to be suitable for allocation as it is considered that traffic constraints and proximity to the Broads restricts additional growth in Wroxham.
South of Wherry Gardens	GNLP2135	5.90	100 dwellings	This site is adjacent to the existing allocation, there is a safe route to school but the site is at the limits of an acceptable distance. The site is not considered to be suitable for allocation as it would result in a significant southwards elongation of development into the countryside. The site also has an unbalanced development frontage and would require

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				inappropriate extension to the speed limit and visibility requirements which would be excessive to mitigate risk. In addition, traffic constraints and proximity to the Broads restricts additional growth in Wroxham.

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

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0041 Wroxham Football Club, Trafford Park, 35 Skinners Lane, Wroxham (Unreasonable residential site)
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
Wroxham Parish Council	Comment	Agree development of site would be inappropriate for current road access, while road improvements would spoil riverside location.	• None	Noted. The site is not allocated.	None
Wroxham FC	Object	Unreasonable status will affect football club's ability to serve growing village and team's progress. Playing pitch strategy recommends WFC relocated in the growth triangle.	 Check contents of, and cross refer to Playing Pitch Strategy 	The Playing Pitch Strategy does identify relocation of WFC in the action pan. However, this site is not considered suitable for housing development.	None

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2131 East of Salhouse Road, Wroxham (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 2 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
Wroxham Parish Council	Comment	Agree that site is unreasonable, local residents agree, too large and proximity to conservation area and Broads.	• None	Noted. This site is not allocated.	None
Hopkins Homes	Object	Addressing technical points re landscape and traffic impacts (attachment)	Reconsider landscape and traffic impacts	Landscape impacts (appendix C) and traffic impacts (appendix B and D) have been reconsidered. However the landscape and townscape impacts and impact on the	None

				Broads from leisure users outweigh the benefits of developing the site.	
Hopkins Homes	Object	Reaffirms site's suitability and refers to same attachment	As above	As above	None

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2135 South of Wherry Gardens, Wroxham (Unreasonable Residential Site)
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
Wroxham Parish Council	Comment	Agree that site is unreasonable. Site is too large and would put pressure on roads and services. Proximity to conservation area and Broads.	• None	Noted. The site is not allocated.	None
Hopkins Homes	Object	Reaffirms site's suitability and attachment addresses constraints	Reconsider landscape and traffic impacts	Landscape impacts (appendix C) and traffic impacts (appendix B and D) have been reconsidered. However the landscape and townscape impacts and topography of	None

		the site outweigh	
		the benefits of	
		developing the site.	

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 Wroxham totalling 13.25 hectares of land. The outcome of initial site assessment work (which is detailed in part 1 of this booklet) was not to prefer any sites due to traffic constraints and the proximity to the Broads.

Summary of comments from the Regulation 18C draft plan consultation

Through the Regulation 18C consultation a number of comments were received regarding sites in Wroxham. The main issues raised were that two of the sites are too large for the village and one is constrained due to the local road network (detailed in part 2 above). Site promoters asserted the ability of their sites to mitigate these issues, and one raised concerns over the ability of the local football club to relocate if the current site was not redeveloped. These comments did not result in any changes to the selection of the site preferred for allocation.

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

No new or revised sites were 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 policy requirements as appropriate. The Sustainability Appraisal (which can be found in the evidence base <u>here</u>) highlighted a number of negative

and positive impacts for the sites in Wroxham but showed how the larger sites scored more intensely.

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 Wroxham is not to allocate any sites, which is the option promoted through the Regulation 18C consultation.

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

