

Settlement Name:	Horsham And Newton St. Faith
Settlement Hierarchy:	<p>Horsham and Newton St Faith form a village cluster in the emerging Greater Norwich Local Plan. The Towards a Strategy document identifies that around 2,000 dwellings in total should be provided between all the village clusters. Horsham and Newton St Faith has a range of services including a primary school, village hall, food shop and public transport.</p> <p>The current capacity at St Faith Primary School is rated as 'amber'. The school is currently at its Published Admission Number (PAN). Although the site is not entirely 'landlocked' the available land for expansion is very limited. Consequently, it is considered that Horsham and Newton St Faith could accommodate development in the region of 20-50 dwellings.</p> <p>At the base date of the plan there is one carried forward residential allocation from the Broadland Local Plan (HNF1, Newton Street) for 60 homes and a total of 15 additional dwellings with planning permission on small sites.</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
Horsham & Newton St Faith			
Poor piece 80, Newton Street	GNLP0085	0.75	Approx. 4 dwellings
Land East of A140, Horsham St Faith	GNLP0125	14.85	Approx. 400 dwellings including highways improvements, public open space and community facilities
Manor Road	GNLP0246	0.78	Residential (unspecified number)
Land off West Lane	GNLP0471	1.21	Approx. 15 dwellings
Land east of Old Norwich Road	GNLP0482	17.38	Approx. 70 dwellings as well as 8.95ha of green space

Land off Manor Road	GNLP1054	5.50	Residential development extending the neighbouring allocation HNF1
Oak Tree Farm	GNLP2021	10.83	Residential (unspecified number)
The Warren	GNLP2030	1.65	Residential (unspecified number)
Manor Road / A140 Cromer Road	GNLP2141	2.63	20-40 dwellings
East of Manor Road	GNLP3027	2.63	25-50 dwellings
North of Meadow Farm Lane	GNLP3028	1.95	25-50 dwellings
Total area of land		60.16	

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
Horsham & Newton St Faith			
Adjacent to Abbey Farm Commercial Park	GNLPSL2007R	3.5	Extension of settlement limit for employment uses (promoted as SL proposal even though it is large enough for an employment allocation).

6(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
Horsham & Newton St Faith			
Land off the NNDR	GNLP0466R	33.00	Employment uses

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

*Site GNLP1061, which overlaps slightly into Horsham and Newton St Faith Parish, is considered in the Norwich 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														
Horsham & Newton St Faith														
GNLP0085	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green
GNLP0125	Amber	Green	Amber	Green	Green	Green	Green	Green	Amber	Green	Amber	Green	Green	Amber
GNLP0246	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green
GNLP0471	Amber	Green	Amber	Green	Green	Amber	Green	Green	Green	Green	Green	Green	Amber	Green
GNLP0482	Amber	Amber	Amber	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Amber	Amber
GNLP1054	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Amber	Green
GNLP2021	Amber	Amber	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Amber
GNLP2030	Amber	Green	Amber	Green	Green	Red	Green	Green	Green	Amber	Green	Green	Green	Green
GNLP2141	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green
GNLP3027	Green	Green	Green	Green	Green	Red	Green	Amber	Green	Amber	Green	Green	Amber	Green
GNLP3028	Amber	Green	Green	Green	Green	Amber	Green	Amber	Green	Amber	Amber	Green	Amber	Green

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

Site Reference	Comments
Horsham & Newton St Faith	
GNLP0085	<p>General comments Approval has already been given for four dwellings at this site. If the number of dwellings should be appropriate, there is no objection.</p> <p>Horsham and Newton St Faiths Parish Council comments Approval has already been given for four dwellings at this site and the Parish Council has no objection</p>
GNLP0125	<p>General comments The development is incompatible with the existing settlement and would not be supported by the current infrastructure. The site would prejudice a 'no development' policy near the NDR. The NDR should free traffic on radial roads.</p> <p>Comments submitted in support of site. The site is considered suitable for development and supporting information has been put forward.</p> <p>The site is available for development and the developer recognises that there are some constraints that need to be addressed.</p> <p>Horsham and Newton St Faiths Parish Council comments The Parish Council completely rejects this as being totally incompatible with the existing settlement and would not be supported by the current infrastructure.</p>
GNLP0246	<p>General comments This is a huge development and would put lots of pressure on Manor Road and increase demand for local services and increase pollution of many sorts.</p> <p>This site is suitable for a few houses that would not destroy the character.</p> <p>Horsham and Newton St Faiths Parish Council comments This would be suitable for a small number of houses which would not destroy the character of the village.</p>
GNLP0471	<p>General comments This is good agricultural land and the access is on narrow lanes.</p>

	<p>Horsham and Newton St Faiths Parish Council comments This would sacrifice good agricultural land and additional traffic on already narrow lanes.</p>
GNLP0482	<p>General comments Prime agricultural land would be sacrificed and there would be a significant impact on the village's character. Extra pressure on already congested roads.</p> <p>The site would prejudice a 'no development' policy near the NDR. The NDR should free traffic on radial roads.</p> <p>The site is suitable for housing development. Some technical issues include safety, access, heritage and flooding and these are addressed in the full representation submitted.</p> <p>Horsham and Newton St Faiths Parish Council comments The Parish Council objects to the use of prime agricultural land and the size of the development would be inappropriate to the "village" concept of Horsham and Newton St. Faith.</p>
GNLP1054	<p>General comments There is enough development here and an extension would be out of keeping with the village. Vehicular access is restricted and hazardous so would be more appropriate for cattle. The development would increase noise/air/light pollution and put pressure on services.</p> <p>The site would prejudice a 'no development' policy near the NDR. The NDR should free traffic on radial roads.</p> <p>Individual merits of the site have been wrongly assessed in the HELAA scoring. The alternative scoring (attached) better reflects the sites and the fact that no listed buildings/historic landscapes are near.</p> <p>Horsham and Newton St Faiths Parish Council comments There is sufficient development capacity in the existing allocation and an extension would be out of keeping with the village which has very few facilities.</p>
GNLP2021	<p>General comments Objections raised concerns regarding distance from the main village and services and the impact on rural character of the village.</p> <p>Horsham and Newton St. Faiths Parish Council comments The Council is opposed as this would be a settlement disconnected from the existing community.</p>

GNLP2030	<p>General comments One comment the site will need to be assessed against the overall level of growth in the village. This needs to be commensurate with amenities available. Horsham & Newton St Faith is a rural village with amenities to match. There is no local appetite to become a suburb of Norwich.</p> <p>Norfolk Wildlife Trust comments We note the proximity of this site to the Horsham Meadows CWS and are concerned at the potential ecological impacts of housing in this location. Should this site be progressed to the next consultation stage, then we would expect it to be accompanied by further details demonstrating how it would be deliverable without resulting in damage to adjoining areas of ecological value, for example through providing sufficient stand-off between development and priority habitats, and where proportional the provision of green infrastructure to ensure that the site has a net benefit for biodiversity.</p> <p>Horsham and Newton St Faiths Parish Council comments The Council has no objection in principle but is concerned at the possible effect on school places and, with the proximity to the school, the effect that this could have on possible future school expansion needs including recreational area.</p>
GNLP2141	<p>General comments Objections raised concerns regarding road safety, access, out of proportion, lack of infrastructure, impacts on the environment and the quality of communal village life.</p> <p>This parcel of land ref: GNLP2141 would, with already approved land commitments, leave a large proportion of Newton totally encapsulated by modern suburban sprawl and destroying the character currently viewed by others and not forgetting the strain on the local school and doctors.</p> <p>One comment in support of site suggest the site 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 residential development.</p> <p>Horsham and Newton St Faiths Parish Council comments The Council has no objection in principle but expresses concern at the effect on the Manor Road/A140 junction and the poor transport links to employment areas.</p>
GNLP3027	No comments as site submitted during Stage B consultation
GNLP3028	No comments as site submitted during Stage B consultation

STAGE 4 – DISCUSSION OF SUBMITTED SITES

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

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

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

11 sites larger than 0.5ha are promoted for residential use in the Horsham St Faith and Newton St Faith village cluster. The amount of land promoted gives potential for significant development but capacity at St Faiths Primary School is limited. New development is consequently limited to 20-50 new homes. Development could either be northwards in Newton St Faith or southwards in Horsham St Faith, as the school is located on Manor Road with a safe walking route in either direction.

Of the four sites promoted in Newton St Faith (GNLP0085, 0246, 1054 and 2141) all are considered to be reasonable alternatives as they are well related to the existing form and character of the village with a safe pedestrian route to St Faiths Primary School and minimal other constraints, other than a section of surface water flood risk in the centre of site GNLP1054. Site GNLP2141 would be prominent when viewed from the A140 and there could potentially be traffic noise issues. This does not necessarily preclude it from being a reasonable alternative site at this stage but these factors would need to be considered in the design and layout of any potential scheme on the site.

Of the sites proposed in Horsham St Faith GNLP0125 is considered to be a reasonable alternative. At 14 ha it exceeds the housing requirement for this village cluster, but an eastern portion of the site fronting West Lane could be suitable for further assessment. In highway management terms GNLP0125 is on the western side of the settlement nearer to the A140 and there is a footpath northwards along Church Street towards the school.

In terms of the other sites promoted in Horsham St Faith there are issues over highways constraints, flood risk, and that the size of sites exceeds the required amount of housing. GNLP0471, 2030 and 3027 are not considered to be reasonable alternatives due to flood risk reasons. Site 0471 also relies on access along the narrow Meadow Farm Lane or Mill Lane. Site GNLP2021 is not considered to be a reasonable alternative as it is separated from the existing form and character of the village with resulting townscape and landscape implications. Although closer to the existing built up area of the village GNLP0482 would also be prominent in landscape terms and is therefore is also not considered to be a reasonable alternative. GNLP3028 is not a reasonable alternative as there is no safe pedestrian route to school and vehicular access would be from narrow roads.

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
Horsham & Newton St Faith			
Poor piece 80, Newton Street	GNLP0085	0.75	Approx. 4 dwellings
Land East of A140, Horsham St Faith	GNLP0125	14.85	Approx. 400 dwellings including highways improvements, public open space and community facilities
Manor Road	GNLP0246	0.78	Residential (unspecified number)
Land off Manor Road	GNLP1054	5.50	Residential development extending the neighbouring allocation HNF1
Manor Road / A140 Cromer Road	GNLP2141	2.63	20-40 dwellings
Total area of land		24.51	

STAGE 6 – DETAILED SITE ASSESSMENTS OF REASONABLE ALTERNATIVE SITES

Site Reference:	GNLP0085
Address:	Poor Piece, 80 Newton Street
Proposal:	Approx. 4 dwellings

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural land	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
Amber Constraints in HELAA Access, Transport and Roads
HELAA Conclusion This site is greenfield land bounded by Newton St and Fairholme Rd. It is well related to services, and to the character of the village. Initial highway evidence has indicated that there are potential access constraints on the site, but these could be overcome through development. Also, subject to suitable footpath provision, any potential impact on the functioning of local roads could be reasonably mitigated. There are no concerns over contamination, ground stability, flood risk, ecology, landscape, or quality of agricultural land though careful consideration should be given to listed building to the south of the site. There are number of constraints but as these may be possible to mitigate the site is concluded as suitable for the land availability assessment.

FURTHER COMMENTS
Highways Yes. Frontage development required. (4 dwellings)
Development Management Difficult to see how 15 dwellings could be provided on this site given constraints - part of site has planning permission for 4 dwellings. Also, a significant distance from services in Horsham - Newton has very little to offer
Minerals & Waste No safeguarded mineral resources.
Lead Local Flood Authority Few or no Constraints. Standard information required at a planning stage. RoSFW mapping indicates that the site is not at risk from surface water flooding. There is a watercourse shown on mapping within 200m of the site but there is no connection to it shown on mapping. Given the location of the site there may be sewerage connections available. If not therefore surface water drainage may be reliant on

the results of infiltration testing. We have been consulted on a minor application for this site, but did not respond as we are not the statutory consultee for minor applications.

PLANNING HISTORY:

20170788

Site is a commitment under 20170788 for 4 dwellings.

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

No additional documents submitted to support this proposal.

Site Reference:	GNLP0125
Address:	Land East of A140, Horsham St Faith
Proposal:	Approx. 400 dwellings including highways improvements, public open space and community facilities

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
<p>Amber Constraints in HELAA Access, Utilities Capacity, Townscapes, Historic Environment, Compatibility with Neighbouring Uses</p>
<p>HELAA Conclusion This site is greenfield land bounded by A140, Church Road and West Lane. It is well-related to services and the character of the village. Initial highway evidence has indicated that there are potential access constraints on the site, but these could be overcome through development. Also, subject to suitable footpath provision, any potential impact on the functioning of local roads could be reasonably mitigated. 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, scale of development proposed and noise. 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 provision of frontage footways and any required carriageway widening. Review of and improvements required to walking route to school, particularly at junctions en route. Two vehicular accesses required.</p>
<p>Development Management The site is close to the historic core with conservation area and listed buildings nearby - development would need to very carefully consider these constraints through the highest standards of design. Scale of development is probably too large for a settlement of this size and a smaller allocation would therefore be preferable. Noted that school capacity is 15-20 which may be too small for the developer. This site is the most preferred from an access and proximity to services perspective.</p>
<p>Minerals & Waste No safeguarded mineral resources.</p>

Lead Local Flood Authority

Few or no Constraints. Standard information required at a planning stage. There is no surface water risk identified on this site as shown in the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible).

PLANNING HISTORY:

No applications found

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

- Concept master plan
- Surface Water Drainage Design
- Highway and Access
- Flood Risk and Drainage Assessment

Site Reference:	GNLP0246
Address:	Manor Road
Proposal:	Residential (unspecified number)

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agricultural	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
Amber Constraints in HELAA Access, Utilities Capacity, Historic Environment
HELAA Conclusion The site is greenfield land off Manor Road. It is well-related to services and character of the village as linear development. Initial highway evidence has indicated that there are potential access constraints on the site, but these could be overcome through development. Also, subject to suitable footpath provision, any potential impact on the functioning of local roads could be reasonably mitigated. 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 listed buildings. There are number of constraints but as these may be possible to mitigate the site is concluded as suitable for the land availability assessment.

FURTHER COMMENTS
Highways Yes. Frontage development required.
Development Management Site acceptable as continuation of built form but may struggle to deliver 15 dwellings at a similar density to existing built form. Would highways need footpath upgrades to access school (although this will need to be delivered for existing allocation where application is currently being considered therefore may not be necessary)?
Minerals & Waste No safeguarded mineral resources.
Lead Local Flood Authority Few or no Constraints. Standard information required at a planning stage. There is no surface water risk identified on this site as shown in the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps .Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible).

PLANNING HISTORY:

No history

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION
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No additional documents submitted to support this proposal.

Site Reference:	GNLP1054
Address:	Land off Manor Road
Proposal:	Residential development extending the neighbouring allocation HNF1

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Vacant agricultural land with well-established hedgerow boundaries	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
Amber Constraints in HELAA Access, Historic Environment, Transport and Roads
HELAA Conclusion This is greenfield site off Newton Street and Manor Road, adjacent to existing housing allocation. It is well related to services and character of the village. Initial highway evidence has highlighted concerns that the possibility of creating suitable access to the site is severely constrained. Other constraints include sections at risk of surface water flooding, impact to setting of listed building, and historic environment record. There are number of constraints but these may be possible to mitigate. Removing the area already committed, approximately 3ha of the site is concluded as suitable for the land availability assessment.

FURTHER COMMENTS
Highways Yes, subject to acceptable access via HNF1 and pedestrian/cycle only access at Manor Road to north.
Development Management Site is contrary to existing settlement grain however this has been eroded through existing allocation HNF1. Would result in loss of pasture detrimental to landscape character and raises neighbour amenity issues to access arrangements between two dwellings. Current application 20181525 under appeal against non-determination.
Minerals & Waste No safeguarded mineral resources.
Lead Local Flood Authority Few or no Constraints. Standard information required at a planning stage. RoSFW mapping indicates that the site is generally not at risk from surface water flooding. However, two small areas of ponding are shown to occur in the 3.33% event, and 1% event. In the 0.1% event, the ponding becomes more widespread, and is

mapped to reach depths of between 0.15m and 0.3m. There is a mapped watercourse within 200m of the site, but no connections are shown to it, on mapping. Surface water sewerage connections may be available. If not, disposal of surface water would be reliant on the results of infiltration testing.

PLANNING HISTORY:

20181525

Current outline application for 64 dwellings under 20181525 - appeal made against non-determination. Officers would have refused on landscape ground and neighbour amenity grounds (due to access).

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

No additional documents submitted to support this proposal.

Site Reference:	GNLP2141
Address:	Manor Road/A140 Cromer Road
Proposal:	20-40 dwellings

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Arable agriculture	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
Amber Constraints in HELAA Access, Utilities Capacity, Historic Environment
HELAA Conclusion The is a 2.63 ha greenfield site situated between the Cromer Road (A140) to the west and Manor Road to the east. Initial Highways Authority advice has indicated that access could be possible, subject to the necessary improvements. There is a footpath on the opposite side of Manor Road and facilities like the school are within an accessible distance. There are no concerns over potential flood risk, ecology, land contamination or ground stability. Whilst not necessarily a HELAA constraint, the site occupies a prominent position next to the A140 so may require particular consideration to landscaping, design layout, and noise attenuation. In conclusion, the site is suitable for the land availability assessment.

FURTHER COMMENTS
Site will extend settlement close to A140 with landscape and noise implications and breaks form of Newton which is wholly to east of Manor Road. Newton has very limited level of services. Scale of site likely larger than necessary to deliver required number of dwellings.

PLANNING HISTORY:
No history

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION
<ul style="list-style-type: none"> • Access Appraisal

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

Five reasonable alternative sites have been identified in the Horsham St Faith and Newton St Faith cluster at stage five. These sites were considered to be worthy of further investigation to look at their potential for allocation as the initial assessment did not flag up any major constraints that would preclude allocation. These sites have been subject to further discussion with Development Management, Highways, Flood Authority and Children’s Services in order to identify preferred sites for allocation and their comments are recorded under stage six above. As part of this further discussion it was agreed that site GNLP0125 was the most appropriate one for allocation to meet the capacity identified for the cluster, albeit on a much smaller boundary than originally proposed to reflect the fact that there is limited capacity in the school and sensitivities relating to the Conservation Area and nearby listed buildings. Other sites were discounted because they would either be too small to meet the minimum threshold for allocation or they would have significant landscape impacts.

In conclusion, one site is identified as a preferred option, providing for between 20-30 new homes in the cluster. There is one carried forward residential allocation for 60 homes and a total of 15 additional dwellings with planning permission on small sites. This gives a total deliverable housing commitment for the cluster of between 95-105 homes between 2018 – 2038.

Preferred Sites:

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Horsham & Newton St Faith				
Land to the west of West Lane	GNLP0125 (part of a larger site)	1.44	20 - 30 dwellings	This site is proposed for allocation but for a smaller area than submitted to reflect the fact that there is limited capacity at St Faiths Primary School. The site has sensitivities relating to the nearby Conservation Area and Listed Buildings.

Reasonable Alternative Sites:

Address	Site Reference	Area (ha)	Promoted for	Comments
Horsham & Newton St Faith				
NO REASONABLE ALTERNATIVE SITES				

Unreasonable Sites:

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
Horsham & Newton St Faith				
Poor piece, 80 Newton Street	GNLP0085	0.75	Approx. 4 dwellings	Although this site is well related to the form and character of the village adjacent to the existing settlement limit it is not considered to be reasonable for allocation as it unlikely to meet the minimum 12-15 dwelling allocation requirement as frontage development would be preferred. There are mature trees to the roadside, which add to the street scene and should be retained, which may also impact on the developable area. Part of the site already has planning permission for 4 dwellings.
Manor Road	GNLP0246	0.78	Residential (unspecified number)	This site is well related to the existing form and character of the village with a safe pedestrian route to St Faiths Primary School and minimal other constraints. It is not considered to be reasonable for allocation as it is unlikely to meet the minimum allocation threshold of 12-15 dwellings if developed at a similar density to reflect existing built form.
Land off West Lane	GNLP0471	1.21	Approx. 15 dwellings	This site is considered to be unreasonable for flood risk and highway

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				<p>reasons. There is an area of surface water flood risk which will affect the overall developable area and make it unlikely that the minimum 12-15 dwelling allocation requirement could be met. Access would be via West Lane which is a narrow unadopted road that is unlikely to be suitable for development traffic.</p>
Land east of Old Norwich Road	GNLP0482	17.38	Approx. 70 dwellings as well as 8.95ha of green space	<p>This is a sizeable site which if developed in its entirety would be too large for the identified capacity of the cluster. The site is considered to be unreasonable for allocation as development in this location would be particularly prominent in the landscape.</p>
Land off Manor Road	GNLP1054	5.50	Residential development extending the neighbouring allocation HNF1	<p>This site is reasonably well related to the existing built form and character of the village, adjacent to the existing HNF1 allocation, with a safe pedestrian route to St Faiths Primary School. There is a section of surface water flood risk. The site is not considered to be reasonable for allocation due to landscape character and neighbour amenity issues. Current outline planning application 20181525 is under appeal against non-determination.</p>

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
Oak Tree Farm	GNLP2021	10.83	Residential (unspecified number)	This site is considered to be unreasonable for allocation as it is separated from the existing form and character of the village with resulting townscape and landscape implications. There is no safe walking route to St Faiths Primary School.
The Warren	GNLP2030	1.65	Residential (unspecified number)	This site is considered to be unreasonable for flood risk reasons. The site is almost wholly covered by surface water flood risk which would affect the developable area. The site also appears to be covered by a large number of mature trees.
Manor Road/ A140 Cromer Road	GNLP2141	2.63	20-40 dwellings	This site has a safe pedestrian route to St Faiths Primary School. However, the site is not considered to be reasonable for allocation as it would be very prominent when viewed from the A140 and traffic noise would be an issue. Development in this location would extend residential development west of Manor Road contrary to the existing settlement pattern and would be out of keeping with the form and character of the village.
East of Manor Road	GNLP3027	2.63	25-50 dwellings	This site is considered to be unreasonable for allocation for flood risk reasons. The site is almost wholly covered

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				by surface water flood risk which would affect the developable area.
North of Meadow Farm Lane	GNLP3028	1.95	25-50 dwellings	This site is considered to be unreasonable for allocation as vehicular access would be from narrow roads and there is no safe walking route to St Faiths Primary School.

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

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0125 Land west of West Lane, Horsham St Faith (Preferred Site)
TOTAL NUMBER OF REPRESENTATIONS:	19
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 15 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
Anglian Water	Comment	No reference to water efficiency forming part of the design unlike other allocation policies. See comments on Policy 2	Consistent policy approach to water efficiency needed	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Historic England	Object	Concerns over any development as has potential impact on surrounding heritage assets (Grade I listed Church of Blessed Virgin and St Andrew and scheduled monument St Faith Priory). We suggest that a more detailed Heritage Impact Assessment	Consider need for more detailed Heritage Impact Assessment Consider the conservation area in policy wording	It is accepted that the policy should acknowledge the potential for harm to the heritage assets and the requirement for measures to address this including a Heritage Impact Assessment	Reword the current policy requirement to read: 'Any development must

		<p>be undertaken to assess the impact of the proposed development upon the significance of these heritage assets, to establish the suitability or otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable. If the site is found suitable, the findings of the HIA should then inform the policy wording.</p> <p>The policy wording should also reference the conservation area.</p>			<p>conserve and enhance the significance of the grade I listed Church of St Mary and St Andrew, the scheduled monument St Faith Priory and the conservation area, including any contribution made to that significance by setting. This includes but is not limited to a sensitive design and layout. Due to the sensitivities of this site a Heritage Impact</p>
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					Assessment will be required'.
Members of the public - various	Object	<p>Issues Including:</p> <ul style="list-style-type: none"> • Local amenities/infrastructure already stretched • Traffic already challenging • Joining up with the HNF2 area – losing semi-rural feel of area • Unsuitable access – dangerous for existing junction, visibility issues with existing tree belt • The culvert in West land needs to be kept open for flood risk • School Capacity • Sewage and drainage concerns • Grade II listed building opposite the church, near site. Church is also a listed building • Site would remove rural buffer between village, an A road and employment development to the south. • Landscape Issues • Lack of biodiversity benefits 	Further investigation of heritage, landscape and conservation impacts	Comments noted. Further discussions have taken place regarding the site and comments submitted during the Reg 18C consultation and it is still supported as the most appropriate site in the cluster for development.	None

		<ul style="list-style-type: none"> Detailed assessment of site should be made upon a reduced area 			
Member of the Public	Comment	<ul style="list-style-type: none"> Concerns regarding conservation area – very close to site entrance, suggests using land as a children’s play area 	Further investigation of conservation impacts	Comments noted. Further discussions have taken place regarding the site and comments submitted during the Reg 18C consultation and it is still supported as the most appropriate site in the cluster for development although it is recognised that the design and layout of the site is very important to minimise adverse impact on nearby heritage assets.	None
Bidwells (Site Promoter)	Support	<p>Sustainable location for growth, benefitting from a range of services and amenities, including a primary school, village hall, local shop and public transport provision.</p> <p>The site is suitable, available, achievable and viable, and is deliverable within the first five years of the plan period. There are no constraints which would affect the suitability of the site for residential development.</p>	Consider revised policy wording	A revised site proposal was submitted through the Reg 18C consultation to increase the size of site slightly to accommodate up to 50 dwellings. Further consideration has been given to this proposal and it is considered to be acceptable as there is capacity in the cluster and the proximity of existing employment allocations to the north and south. The	Amend the site boundary as submitted to increase allocation to 50 dwellings

		<p>We have demonstrated the suitability of the site to accommodate all of the growth allocated to the cluster of Horsham and Newton St Faith (i.e. 50 dwellings), if required, and is capable of meeting the requirements of Policy GNLP0125 . This is particularly relevant given that no alternative sites are identified in Horsham and Newton St Faith as being suitable for development. Accordingly, the foregoing text demonstrates that this specific site is a suitable location for further development, and Abel Homes supports the GNLP's proposals to allocate the site under Policy GNLP0125 for residential development.</p> <p>Assessment of Deliverability included and suggested revised policy wording.</p>		<p>local highway authority are supportive of the increase in site size subject to acceptable access, provision of frontage footways and any required carriageway widening. There will need to be a review of any improvements required to the walking route to school and two points of vehicular access.</p> <p>It is not considered that extending the site further west wards will have an additional impact on heritage assets.</p>	
Bright Future Developments St Faiths Ltd	Object	<p>The basis of identifying this site for allocation appears flawed when the site is considered against the HELAA, as there are clearly significant constraints associated with the development of the site. There</p>	Relook at HELAA assessment	<p>All sites in the Horsham St Faith cluster were considered on their merits and consideration given to whether a smaller part of a larger site may be acceptable for</p>	None

		<p>are also questions as to whether the small scale of development will be viable and besides affordable housing there will be no benefits arising from the site. The site is also a considerable distance from the Primary School and the community buildings when compared with other sites within both Newton and Horsham St Faiths. No works are sought to improve pedestrian access to this facility.</p> <p>The identification of this site as a preferred option should be rejected. If not a detailed assessment of the site should be made based upon the reduced area. This assessment should also demonstrate how the impact of the development is to be properly mitigated in relation to the wider landscape setting. At the same time other sites should be reassessed to confirm whether a smaller site area would render them suitable for development. This aspect of the plan is</p>		<p>development. The process of site selection is clearly set out in the site assessment booklet.</p> <p>A revised site proposal was submitted during the Reg 18C consultation which has been subject to HELAA and further discussion and has been determined to be suitable for 50 dwellings.</p>	
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		considered to be unsound and the evidence available does not justify the identification of this site as the preferred option.			
Horsham and Newton St Faiths Parish Council	Object	The Council feel that further development in the parish should be confined to “infill” within the current local plan boundary. They have no doubt that if the proposal to allocate GNLP0125 for residential development went ahead the planning authority would come under extreme pressure to increase this further into that landholding putting even more stress on local facilities and infrastructure. The land west of West Lane provides a green buffer zone to the various areas adjacent to the A140, Church Street and the NDR which are allocated for commercial activity.		Comments noted. The need to find additional housing in the Greater Norwich area over the plan period to 2038 means that it is necessary to make small scale allocations in villages such as Horsham St Faith and infill within the current local plan boundary is not a realistic option. Site GNLP0125 has been assessed as the most suitable site for allocation in the cluster but on a smaller boundary than originally proposed in the period up to 2038.	None

Horsham and Newton St Faith Cluster – Carried Forward Allocations

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Policy HNF1 Land east of Manor Road, Newton St Faith (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	4
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 3 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
Historic England	Object	Whilst there are no designated heritage assets within the site boundary, the grade II listed Middle Farmhouse and Granary lie to the east of the site. Any development of the site has the potential to impact upon the setting of these listed buildings. There is currently no mention of the listed building in the policy or supporting text. Landscaping along the	Further investigation of heritage impacts Revisit policy to take in consideration listed building	It is accepted that the policy should acknowledge the potential for harm to the heritage assets and the requirement for measures to address this.	Add a policy requirement to read: 'Any development must conserve and enhance the significance of the grade II listed Middle Farmhouse and Granary to the east of the site, including any

		<p>eastern edge of the site would help to mitigate the impact on the heritage asset.</p> <p>Suggested Change: Amend the policy and supporting text to make reference to the grade II listed Middle Farmhouse and Granary and the need to conserve and enhance the significance of the heritage assets (including any contribution made to that significance by setting). Mention landscaping along the eastern site boundary.</p>			<p>contribution made to that significance by setting. This includes but is not limited to landscaping along the eastern site boundary’.</p>
Anglian Water	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design. See comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>Consistent policy approach to water efficiency needed</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p>	<p>None</p>
Member of the Public – 2 People	Object	<p>Issues Include:</p> <ul style="list-style-type: none"> • Environmental Impact • Capacity of local amenities • Loss of country roads 	<p>Further investigation of landscape and environmental impacts</p>	<p>The principle of the HNF1 allocation has already been agreed through the Broadland Local</p>	

		<ul style="list-style-type: none">• Noise pollution from NDR• Loss of countryside views		Plan. No evidence has been submitted to suggest it is undeliverable so it is carried forward unchanged into the GNLP for 60 dwellings.	
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Horsham and Newton St Faith Cluster – Unreasonable Sites

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0482 Land east of Old Norwich Road, Horsham and Newton St Faith (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	22
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	21 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
Member of the Public – Various	Support	Supports Unreasonable site because: <ul style="list-style-type: none"> • Intrusion on rural landscape • Narrow, unsafe roads and junctions • HGV restrictions • Amenity land already exists • Bullock Hill – newly built cycle path links to nearby villages already in place • Highly productive agricultural land 		Comments noted	None

		<ul style="list-style-type: none"> • Local historic site (Old Drivers' Road), ancient hedgerows and Norfolk Wildlife logged endangered species • Noise Pollution • Access to NDR through narrow roads and sharp bend • Sewer System already failing • Not enough infrastructure • Loss of Wildlife • Land is of Historical Interest • Added to important history area- largest cattle and horse fair in Norfolk was held from 12th Century • Lack of paths 			
ESCO Developments Ltd (Site Promoter)	Object	<p>No significant infrastructure constraints have been identified that would impede or delay the development. Has accessibility to existing local businesses and services. Only 2 schedules monuments within 2km of the site.</p>	<p>Revisit HELAA assessment</p> <p>Consider full utilities statement and landscape assessment</p>	<p>A revised site was submitted through the Reg 18C consultation. Further discussion has taken place regarding the site which is still considered to be unreasonable for</p>	None

		<p>Mitigation planting is proposed by new boundary trees and hedgerows to all boundaries. Informal group planting trees to public open spaces and native planting of meadow grass and wildflowers.</p> <p>Corner of Spixworth road and Old Norwich Road to remain as open space with grass and trees.</p> <p>No Visible water courses or ditches, site is in flood zone 1 and no risk of surface water flooding recorded.</p> <p>Site areas assessed was much larger than proposed in the December 2018. This makes assessment invalid and contradicts 2017 and 2018 HELAAs.</p>		allocation on landscape grounds.	
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP1054 Land off Manor Road, Horsham and Newton St Faith (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	5
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	4 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
Member of the public – various	Support	Support unreasonable site because: <ul style="list-style-type: none"> • Size of development • Lack of amenities and infrastructure • Increase in traffic • Dangerous junctions • Broadland has substantial land supply 		Comments noted	None
Bright Futures Developments St Faiths Ltd (Site Promoter)	Object	Site reflect infill whereas preferred site represents an intrusion into the open countryside. Full Review of Horsham and Newton St Faiths requested. Questions Soundness of Plan.	Consider implications on existing planning permission on HNF1 Revisit HELAA Assessment	A revision to the site was submitted through the Reg 18C consultation to reduce the site from 5.50ha to 1.55ha. Further discussion has	None

		<p>Should be considered against existing built form and character of village. HNF1 is subject to extant planning application (20182043 Full application) for the demolition of a dwelling and the erection of 69 Dwellings and Associated Infrastructure and landscaping at Land off Manor Road, Newton St Faiths, NR10 3LG. The Lovells scheme is also committed to providing a footpath to the south to St Faith's Primary School and the landowners of site GNLP1054 have stated in a recent planning appeal and via a current application that they are committed to extending the pedestrian link on Manor Road.</p> <p>Suggest flood risk comments are incorrect.</p>	<p>Consider reduced number of dwellings</p>	<p>taken place regarding this site and it is still considered to be unreasonable for allocation.</p> <p>The local highway authority has highlighted concerns about creating a suitable access the site and it is not acceptable as a standalone site with direct vehicular access onto Manor Road. Other constraints include sections at risk of surface water flooding, particularly to the eastern boundary and nearby listed buildings.</p> <p>The site was subject to appeal on a planning application 20181525, the</p>	
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		<p>Access has been confirmed as acceptable by Highways.</p> <p>It is accepted that the eastern part of the site is less suitable for development and the most easterly fields should be removed from any assessment. As a result the capacity of the site is circa 25-30 dwellings. The reduced density and site area will still allow surface water drainage to be attenuated on site.</p> <p>In reviewing all of the documents relating to the allocation of development sites in Horsham and Newton St Faiths it is apparent that there are inconsistencies in the commentary relating to the rejection of this site when compared with the HELAA comparison table. This table confirms that the site is not at risk of flooding and</p>		<p>appeal was dismissed and permission refused in December 2019 due to the effect of the proposed development on the character and appearance of the area with specific regard to the setting of listed buildings, the effect of the proposed development on the living conditions of neighbouring occupiers with specific regard to noise disturbance and whether the site is in an appropriate location for development having regard to scale, access to services, sustainable patterns of development and</p>	
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		whilst the Historic Environment is detailed as amber, if the most easterly field is deleted then the score should be green.		the Councils supply of housing sites.	
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2021 Oak Tree Farm, Horsham and Newton St Faith (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	2 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	There is now sufficient development at Newton St Faith there is no need ruin the village with more and more estates.		Comments noted	None
Brown & Co	Support	Whilst the overall strategy for village clusters contained in Policy 7.4 is supported, we believe that	Consider assessment of agricultural land Consider additional land	This site was considered to be unreasonable for allocation as it is	None

		<p>GNLP2021 and the additional land identified should be included as part of the delivery of growth in this part of Greater Norwich. The sites would offer an opportunity to deliver additional housing growth in a highly sustainable area. In particular the land between Meadow Farm Lane and Coltishall Lane is well related to the built form of the village and would form a logical extension to the built form.</p> <p>The contention in the general comments of the Horsham St Faith Assessment Booklet that 'prime agricultural land would be sacrificed' is incorrect as the latest Agricultural Land Classification map of Eastern England places these sites within Grade 3- Good to Moderate agricultural land.</p> <p>Additional Land Submitted</p>		<p>separated from the existing form and character of the village with resulting townscape and landscape implication with no safe walking route to St Faiths Primary School. This situation has not changed so the site continues to be unreasonable for allocation.</p>	
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2030 The Warren, Horsham and Newton St Faith (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
Member of the public	Support	The Warren had recently had a small development a lot of the area surrounding the Warren is waterlogged and marshy. The infrastructure will have difficulty maintaining further development.	Consider waterlogged and marsh comments in assessment	Comments noted. No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.	None
Member of the public	Object	Concerns raised over flooding. Circle housing developed part of this site in 2012 installing additional drainage and have left	Consider drainage comments and potential access	Comments noted. No evidence submitted through Regulation 18C	None

		provision for access for the rest of this site for additional housing in the future. They had the pick of the original site and we asked that they build near the school. We cannot understand why the additional land is unsuitable for development given the contours of the site are exactly the same. Mature trees to be retained.		consultation to justify changing the classification of the site so it remains unreasonable for allocation.	
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2141 Manor Rd/A140 Cromer Road, Horsham and Newton St Faith (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	3 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
Members of the public - various	Support	Support unreasonable site on the basis: <ul style="list-style-type: none"> • Ruin landscape of village • Lack of facilities to support development • Lack of employment opportunities in village • Increase in air pollution • Highway issues and increased traffic • Loss of conservation wildlife site 		Comments noted. No evidence submitted through Regulation 18C consultation to justify changing the classification of the site so it remains unreasonable for allocation.	None

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP3027 East of Manor Road, Horsham and Newton St Faith (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	6
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	4 Support, 0 Object, 2 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 - Various	Support	Support unreasonable site on the basis: <ul style="list-style-type: none"> • Land waterlogged • Lack of infrastructure • Flood Risk • Traffic concerns, dangerous junctions and increased traffic • Access is opposite school 		Comments noted	None
Trustee of M.A Medler	Comment	Additional Land submitted	Consider additional Land	This site as originally proposed was not considered to be suitable for allocation as it was almost wholly covered by surface	None

				<p>water flood risk. The site was revised through the Reg 18C consultation to include a further 2.62ha of land to allow for water attenuation/drainage and green space use although no specific details or layout proposals have been submitted. The local highway authority have commented that the site would be suitable subject to a Transport Assessment and implementation of any agreed measures, maybe as part of a comprehensive strategy with other sites, although that would be much too large for the needs of the cluster.</p>	
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				The LLFA has commented that significant mitigation would be required for severe constraints with significant information required at a planning stage. They recommend a more detailed review of the site. Without specific details or layout proposals this site is not considered to be reasonable for allocation.	
Horsham and Newton St Faiths Parish Council	Support	Concurs with your assessment that these two sites are totally unsuitable for development.		Comments noted	None

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP3028 North of Meadow Farm Lane, Horsham and Newton St Faith (Unreasonable Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	8
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	7 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
Trustee of M.A Medler	Comment	Additional land submitted	Consider additional land	A revised site proposal was submitted through the Reg 18C consultation. The original site was considered to be unreasonable for allocation because vehicular access would be from narrow roads and there is no safe walking route to St Faiths Primary School. No	None

				additional information has been submitted regarding how these issues may be overcome so the site continues to be considered as unreasonable for allocation. The local highway authority have suggested that the site could be looked at as part of a wider strategy with other land submitted but this would be much too large for the needs of the cluster and so is not supported.	
Member of the Public - various	Support	Support unreasonable site on the grounds of: <ul style="list-style-type: none"> • Narrow/Poor access • Narrow roads • Lack of a pedestrian access to School • Flood Risk • Poor drainage • Insufficient infrastructure 		Comments noted	None

Horsham and Newton St Faiths Parish Council	Support	Concurs with your assessment that these two sites are totally unsuitable for development.		Comments noted	None
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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 at Reg 18C
Horsham St Faith and Newton St Faith				
Land to the west of West Lane	GNLP0125R	2.30	Housing	Preferred
Land east of Old Norwich Road	GNLP0482R	5.44	Housing	Unreasonable
Land off Manor Road	GNLP1054R	1.55	Housing	Unreasonable
East of Manor Road	GNLP3027R	10.55	Housing	Unreasonable
North of Meadow Farm Lane	GNLP3028R	12.05	Housing	Unreasonable
Off Manor Road	GNLP4027	0.70	12+ dwellings	New site
West Farm	GNLP4042	12.28	Housing	New site
West Farm	GNLP4043	7.79	Housing	New site
West Farm	GNLP4044	2.67	Housing	New site
Meadow Farm Lane, Coltishall Lane	GNLP4046	6.50	Housing	New site
Coltishall Lane/ Spixworth Road	GNLP4047	8.90	Housing	New site
North of Spixworth Road	GNLP4059	9.36	TBC	New site
South of Spixworth Road	GNLP4060	6.98	TBC	New site
Total		87.07		

STAGE 2 – HELAA COMPARISON TABLE

Site reference	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 & GI	Transport & roads	Compatibility with neighbouring
Horsham St Faith and Newton St Faith														
GNLP0125R	Amber	Green	Amber	Green	Green	Green	Green	Green	Amber	Green	Amber	Green	Green	Green
GNLP0482R	Amber	Amber	Amber	Green	Green	Green	Green	Green	Amber	Green	Amber	Green	Amber	Amber
GNLP1054R	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Amber	Green
GNLP3027R	Amber	Green	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber	Green	Amber	Green
GNLP3028R	Amber	Green	Amber	Green	Green	Amber	Green	Amber	Amber	Amber	Amber	Green	Amber	Green
GNLP4027	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green
GNLP4042	Amber	Green	Amber	Green	Amber	Amber	Green	Green	Green	Green	Amber	Green	Amber	Amber
GNLP4043	Amber	Green	Amber	Green	Amber	Amber	Green	Green	Green	Green	Amber	Green	Amber	Green
GNLP4044	Amber	Amber	Amber	Green	Green	Amber	Green	Green	Green	Green	Amber	Green	Amber	Green
GNLP4046	Red	Amber	Amber	Green	Green	Green	Green	Amber	Green	Amber	Amber	Green	Amber	Green
GNLP4047	Amber	Amber	Amber	Amber	Green	Green	Green	Amber	Green	Amber	Amber	Green	Amber	Green
GNLP4059	Amber	Amber	Amber	Green	Green	Amber	Green	Green	Green	Amber	Green	Amber	Amber	Green
GNLP4060	Amber	Amber	Amber	Amber	Green	Amber	Green	Green	Green	Green	Amber	Green	Amber	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 St Faith

GMLP0125R, Land to the west of West Lane, 2.30ha, housing

This site was originally promoted on a much larger site boundary of 14.85ha for 400 homes and associated infrastructure, following assessment part of the site was preferred for allocation 1.44ha (20-30 homes). The promoter has now submitted a revised site of 2.30ha to accommodate up to 50 homes. The site is well related to services and to the form and character of the village. Initial highway evidence has indicated that the site could be considered suitable subject to provision of frontage footways and any required carriageway widening. Review of and improvements required to walking route to school, particularly at junctions en-route. Two vehicular accesses would be required to site. Proximity to the conservation area, ancient monument and listed buildings including Grade I listed church need to be considered. To allow full consideration of the additional information submitted the site revision is considered to be a reasonable alternative.

GNL0482R, Land east of Old Norwich Road, 2.30ha, housing

This 5.44ha greenfield site is bounded by Old Norwich Road, Spixworth Road and Bullock Hill, the NDR is located approximately 400m to the south of the site. This is a reduction of 11.94ha in site area from the previously submitted site proposal of 17.38ha and a reduction in housing to 60 units. It is well related to services and character of the village and initial highway advice is that potential access constraints could be overcome. There appears to be a safe walking route to St Faiths Primary School. Other constraints include proximity to the conservation area, potential impact to setting of listed buildings, archaeological surveys likely to be required and noise and proximity to Norwich Airport. The site was not shortlisted in the previous site assessment process as it was considered that the original larger proposal would have a significant prominence in the landscape. The site is now considered to be reasonable to shortlist to allow for further discussion to take place regarding the additional; evidence submitted to consider whether it addresses the landscape impact concerns. It is likely that only the triangle of land between the Old Norwich Road and Bullock Hill would be considered as having any potential. The other side of Bullock Hill more prominent in the flat landscape and out of scale with the development required in St Faiths. The submission proposes open space at the front of the development which may soften the landscape impact.

GNL1054R, Land off Manor Road, 1.55ha, housing

This is a 1.55ha greenfield site off Newton Street and Manor Road, adjacent to existing housing allocation HNF1. The site is reduced from 5.50ha. Initial highway evidence has highlighted concerns that the possibility of creating suitable access to the site is severely constrained and it is not acceptable as a standalone site with direct vehicular access to Manor Road. Other constraints include sections at risk of surface water flooding, particularly to the eastern boundary of the site and nearby listed buildings. The original site was shortlisted at Stage 5 of the Horsham and Newton St Faith site assessment booklet but was ultimately not considered to be suitable for allocation due to landscape concerns and neighbour amenity issues. At the time of the previous site assessment process the site was subject to a planning application 20181525 which was at appeal for non-determination. The appeal was dismissed and planning permission refused in December 2019 due to the effect of the proposed development on the character and appearance of the area with specific regard to the setting of listed buildings, the effect of the proposed development on the living conditions of existing neighbouring occupiers with specific regard to noise disturbance and whether the site is in an appropriate location for development having regard to scale, access to services, sustainable patterns of development and the Council's supply of housing sites. For these reasons the site is considered to be unreasonable for allocation and therefore it is not shortlisted for further consideration.

GMLP3027R, East of Manor Road, 10.55ha, housing

This greenfield site was not shortlisted at Stage 5 in the Horsham and Newton St Faith site assessment booklet because the site as originally promoted was almost wholly covered by surface water flood risk which would have affected the developable area. The site is now being promoted for 10.55ha, an increase from 2.62ha to allow additional land for water attenuation/drainage and green space use although no specific details or layout proposals have been submitted. The site abuts the existing settlement boundary and is reasonably located to services in Horsham St Faith. It is opposite St Faiths Primary School so a safe walking route should be possible. Access is proposed from Manor Road and initial highway evidence suggest the site may be suitable subject to a Transport Assessment and implementation of any agreed mitigation measures. Access strategy to be agreed, cycleway/footway required at Manor Road site frontage, no vehicular access to Mill Lane and community car park required to support school and crematorium and to ensure that Manor Road remains clear of parked vehicles. Listed buildings within the vicinity will need to be considered. A large proportion of the site is within flood zone 3 and there is the risk of surface water flooding across the north, east and south boundaries but on balance the revised is considered reasonable to shortlist so that the potential for development on the area of land in flood zone 1 adjacent to Manor Road can be explored further. Highways have suggested that the site could be looked as part of comprehensive strategy with other nearby sites but this would be much too large for the needs of the cluster.

GMLP3028R, North of Meadow Farm Lane, 12.05ha, housing

This greenfield site was not shortlisted at Stage 5 in the Horsham and Newton St Faith site assessment booklet because vehicular access would be from narrow roads and there is no safe walking route to St Faiths Primary School. The site is now being promoted for 12.05ha, an increase from 1.95ha to allow additional land for water attenuation/drainage and green space use although no specific details or layout proposals have been submitted. The surrounding roads remain narrow with no safe walking route to St Faiths Primary School. No additional information has been submitted regarding how these issues may be overcome so the site continues to be considered as unreasonable for allocation. There are a number of listed buildings in the vicinity of the site and it is adjacent to the Horsham Meadows and Spixworth Bridge Meadows County Wildlife Sites. Highways have suggested that the site could be looked at as part of a wider strategy but this would be much too large for the needs of the cluster.

GMLP4027, Off Manor Road, 0.70ha, 12+ dwellings

This 0.7ha greenfield site is off Manor Road. It is well related to services and the character of the village as linear development. This site has previously been

submitted under reference GNLP0246 with a slightly larger boundary 0.78ha. The site was shortlisted at Stage 5 of the Horsham and Newton St Faith site assessment booklet but was then ultimately considered to be unreasonable for allocation as it was thought to be unlikely to meet the minimum 12-15 dwelling threshold for allocation if built at a similar density to reflect the existing built form. This submission is for a slightly smaller site with no detailed layout proposals to demonstrate how 12-15 dwellings could be accommodated on site so it continues to be considered unreasonable for allocation.

GNLP4042, West Farm, 12.28ha, housing

This 12.28ha site is greenfield land bounded by Old Norwich Road to the east and West Lane to the west. The A1270 Broadland Northway (NDR) bounds the site to the south. It is a significant increase of area to previously submitted site reference GNLP0471 (1.21ha). Initial highway evidence has indicated that the site is unsuitable, it is remote with no network access, it would require highway improvement on third party land beyond the site. There is no safe walking route to local primary school. Other constraints include sections at risk of surface water flooding (in the north of the site). In terms of heritage matters, the Horsham St Faith Conservation Area is 300 metres to the north, and the St Faith Priory Scheduled Monument is 400 metres to the north as well as proximity to grade II listed buildings. There are number of constraints including noise and proximity to adjacent proposed employment site (existing allocation), the NDR and Norwich Airport. The site is considered to be unreasonable for allocation and therefore is not shortlisted for any further consideration.

GNLP4043, West Farm, 7.79ha, housing

The site is greenfield land bounded by Old Norwich Road to the west and A1270 Broadland Northway (NDR) to the west. Initial highway evidence has indicated that the site is unsuitable, it is remote with no network access, it would require highway improvement on third party land beyond the site. There is also no safe walking route to primary school. Other constraints include sections at 1:1000 risk of surface water flooding (flow across the site). In terms of heritage matters, the Horsham St Faith Conservation Area is approximately 90 metres to the north, and the St Faith Priory Scheduled Monument is 470 metres to the north as well as proximity to grade II listed buildings. There are number of constraints including noise and proximity to NDR & Norwich Airport. The site is considered to be unreasonable for allocation and is therefore not shortlisted for any further consideration.

GNLP4044, West Farm, 2.67ha, housing

This 2.67ha greenfield site is bounded by Spixworth Road, Calf Lane and Bullock Hill with the NDR located approx. 250m to the south of the site. Although reasonably well related to services there is currently no safe walking route to school along

Spixworth Lane as the current footway does not begin until after the Coltishall Lane junction. It may be possible to provide a footway through development but it is considered that development here would push the boundaries of Horsham St Faith further out into the countryside and be particularly prominent in the flat landscape. Initial highway evidence has indicated that there are potential access constraints on the site but these could be overcome through development, subject to a Transport Assessment. There is a suggestion that transport issues for the site could be considered as part of a comprehensive access strategy with sites GNLP0482R and GNLP4060 but this would lead to a form of development far larger than the needs of the cluster. Other constraints include patches of surface water flood risk, proximity to the conservation area, listed buildings, archaeological surveys possibly required, noise and proximity to Norwich Airport. The site is considered to be unreasonable for allocation and is therefore not shortlisted for any further consideration.

GNLP4046, Meadow Farm Lane, Coltishall Lane, 6.50ha, housing

This is a 6.5ha greenfield site stretching out to the east of Horsham St Faith. The southern edge of the site abuts Coltishall Lane from which access is proposed. The Highway Authority raises concern, stating that as a standalone scheme the site is not suitable but it could be considered with other sites as part of a comprehensive access strategy. This is not considered to be a reasonable proposal as the resulting development would be too large for the strategic requirements of the cluster. The site is reasonably well related to services and facilities with the Primary School 900m away, however although an existing footway reaches the south western corner of the site on Coltishall Lane there does not appear to be a continuous safe walking route to the school. Building on this site would also extend development further out into the countryside contrary to the form and character of the settlement. For these reasons the site is considered to be unreasonable for allocation and is therefore not shortlisted for any further consideration.

GNLP4047, Coltishall Lane/Spixworth Road, 8.90ha, housing

This 8.9ha greenfield site is bounded on the north by Coltishall Lane and to the south by Spixworth Road, from which access is proposed. It is not considered to be suitable for allocation as it is too large in scale for the needs of the cluster and is detached from the main part of the village. Development in this location would be particularly prominent in the flat agricultural landscape. The Highway Authority raises concern, stating that as a stand-alone scheme the site is not suitable, but it could be considered with other sites as part of a comprehensive access strategy. This is not considered to be a reasonable proposal as the resulting development would be too large for the strategic requirements of the cluster. In addition there is no continuous safe walking route to St Faiths Primary School. For these reasons the site is considered to be unreasonable for allocation and is therefore not shortlisted for any further consideration.

GNL4059, North of Spixworth Road, 9.36ha, Use to be confirmed

This 9.36ha greenfield site is proposed for 50-150 homes with open space. The site is between Coltishall Lane to the north and Spixworth Road to the south. Vehicular access is proposed from Spixworth Road. It is not considered to be suitable for allocation as it is too large in scale for the needs of the cluster. Development in this location would be particularly prominent in the flat agricultural landscape. The Highway Authority have raised some concerns about the need for a transport assessment, possible carriage way widening and footways. They state that GNL4059 could benefit from a comprehensive access in conjunction with other promoted sites. This is not considered to be a reasonable proposal as the resulting development would be too large for the strategic requirements of the cluster. In addition there is no continuous safe walking route to St Faiths Primary School. There are no ecological designation but there is a pond and areas with vegetation and trees that will need consideration. There are also areas affected by surface water flood risk. There is an area of designated open space at the north west of the site, however the proposal notes that this will be retained for open space. For these reasons the site is considered to be unreasonable for allocation and is therefore not shortlisted for any further consideration.

GNL4060, South of Spixworth Road, 6.98ha, use to be confirmed

This 6.98h greenfield site is bounded by Spixworth Road to the north, Calf Lane to the west and Bullock Hill to the south, with the NDR located approximately 250m to the south of the site. . It is not considered to be suitable for allocation as it is too large in scale for the needs of the cluster. Development in this location would be particularly prominent in the flat agricultural landscape. Initial highway evidence has indicated that this is not suitable for development as a standalone site as it is not feasible to provide satisfactory walking/cycling provision to access local facilities. They suggest that this site could be considered as part of a comprehensive access strategy for surrounding sites. This is not considered to be a reasonable proposal as the resulting development would be too large for the strategic requirements of the cluster. Other constraints include an area of surface water flood risk to the west of the site and noise due to the proximity of the A1270 Broadland Northway and Norwich International Airport. For these reasons the site is considered to be unreasonable for allocation and is it is therefore not shortlisted for any further consideration.

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 Newton St Faith			
Land to the west of West Lane	GNLP0125R	2.30	Housing
Land east of Old Norwich Road	GNLP0482R	5.44	Housing
East of Manor Road	GNLP3027R	0.55	Housing
TOTAL		18.29	

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

Site Reference:	GNLP0125R
Address:	Land to the west of West Lane, Horsham St Faith
Proposal:	Housing

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agriculture	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
Amber Constraints in HELAA Access, Utilities Capacity, Sensitive Townscapes, Historic Environment
HELAA Conclusion This 2.3ha site is greenfield land bounded by A140, Church Road and West Lane. 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 provision of frontage footways and any required carriageway widening. Review of and improvements required to walking route to school, particularly at junctions en-route. Two vehicular accesses would be required to the site. 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 bounding the Horsham St Faith conservation area, scale of development proposed and noise. There are number of constraints but as these may be possible to mitigate the site is concluded as suitable for the land availability assessment. This is a revised boundary to a previously submitted site. The original site as promoted was far larger than this revision so therefore to avoid double counting for the purposes of the HELAA the site has been marked as unsuitable

FURTHER COMMENTS
Highways Subject to acceptable access, provision of frontage footways and any required carriageway widening. Review of and improvements required to walking route to school, particularly at junctions en route and provision of any agreed measures. Two vehicular accesses required.
Development Management Development Management no concerns about extending the site, particularly due to proximity of employment allocations to the north and south. Main issue appears to be school capacity.
Lead Local Flood Authority GREEN – no surface water flood risk on site, few or no constraints, standard information required at a planning stage. No internal & external flooding on site

but external flooding within 500m. No watercourses on site but ordinary watercourse within 100m. No surface water sewer system on site but within 100m obstructed by housing. In Source Protection Zone 3. The site predominantly has superficial deposits of clay, silt and sand. Comments on infiltration potential are dependent on a complete geotechnical investigation.

PLANNING HISTORY:

None

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

Original submission:

- Assessment of Floor Risk and Drainage
- Highways and Access
- Preliminary surface water drainage design
- Concept Masterplan
- Site access
- (Representation, site submission form and boundary plan)

Revised site:

- (Representation and revised masterplan)

Site Reference:	GNLP0482R
Address:	Land east of Old Norwich Road, Horsham St Faith
Proposal:	Housing

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agriculture	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
<p>Amber Constraints in HELAA Access, Accessibility to Services, Utilities Capacity, Sensitive Townscapes, Historic Environment, Transport and Roads, Compatibility with Neighbouring Uses</p> <p>HELAA Conclusion his 5.44ha greenfield site is bounded by Old Norwich Road, Spixworth Road and Bullock Hill, the NDR is located approximately 400m to the south of the site. This is a reduction of 11.94ha in site area from the previously submitted site proposal of 17.38ha. It is well related to services and character of the village.</p> <p>Initial highway evidence has indicated that there are potential access constraints on the site which could be overcome subject to Transport Assessment and implementation of any agreed mitigation measures. Highway extent at Crown Rd needs to be verified - visibility to west from Old Norwich Rd could be a concern. Access might be appropriate from a realigned Bullock Hill. Footway required at site frontages. This site could perhaps consider a comprehensive access strategy for 0482R, 4044, 4060, 4059, 4047 3028R & 3027R combined, along with appropriate highway improvements.</p> <p>Also, subject to suitable footpath provision, any potential impact on the functioning of local roads could be reasonably mitigated. The site is within adequate distance to utilities, requirements in relation to local network capacities & potential upgrades need to be determined. Other constraints include proximity to conservation area, potential impact to setting of listed buildings, archaeological surveys likely to be required, noise and proximity to Norwich Airport. There are number of constraints but as these may be possible to mitigate. The original site has already been counted towards the land availability assessment, and 11.94ha of the site should be deleted from the HELAA bank to avoid double counting.</p>

FURTHER COMMENTS
<p>Highways Subject to Transport Assessment and implementation of any agreed mitigation measures and subject to agreement on removal of vehicular rights at Bullock Hill. Footway required at site frontages. Perhaps consider a comprehensive access strategy for 0482R, 4044, 4060, 4059, 4047, 3028R & 3027R combined, along with appropriate highway improvements.</p>

Development Management

Not favoured by Development Management due to landscape issues.

Lead Local Flood Authority

GREEN – surface water flood risk on site but not severe enough to prevent development. Few or no constraints, standard information required at a planning stage. No internal & external flooding on site but both within 500m. No watercourses on site or within 100m. No surface water sewer systems on site or within 100m. In Source Protection Zone 3. The site predominantly has superficial deposits of clay, silt and sand. Comments on infiltration potential are dependent on a complete geotechnical investigation.

PLANNING HISTORY:

None

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**Original submission:**

- Transport Technical Note
- Utilities Statement
- Landscape Assessment
- Green Infrastructure Strategy
- Footpath/cycleway and landscape connections to Broadland Northway
- Site Access plans
- (Site submission form and boundary plan)

Revised site:

- (Revised boundary plan)

Site Reference:	GNLP3027R
Address:	East of Manor Road, Horsham St Faith
Proposal:	Housing

CURRENT USE OF SITE:	BROWNFIELD/GREENFIELD:
Agriculture	Greenfield

CONSTRAINTS IDENTIFIED IN THE HELAA
<p>Amber Constraints in HELAA Access, Utilities Capacity, Utilities Infrastructure, Flood Risk, Significant Landscapes, Sensitive Townscapes, Biodiversity and Geodiversity, Historic Environment, Transport and Roads</p>
<p>HELAA Conclusion This revised greenfield site is now being promoted for 10.55ha from 2.62ha, for housing with additional land for water attenuation/drainage and green space use. The site, located east of Manor road, abuts the existing settlement boundary and has housing to the south and west with greenfield to the east and north. The site is reasonably located to services in Horsham St Faith; there are bus stops near the border of the site on Manor Road and St Faiths Church of England Primary School is similarly situated close to the site, the local Dr surgery is within 500m. Access is proposed from Manor Road, initial highway evidence considers the site may be suitable subject to Transport Assessment and implementation of any agreed mitigation measures. Access strategy to be agreed with Highway Authority and may require local improvements. Cycleway/footway required at Manor Road site frontage. No vehicular access to Mill Lane. Community car park required to support adjacent school and crematorium / ensure Manor Road remains clear of parked vehicles, enabling safe access to the site. Perhaps consider a comprehensive access strategy for 0482R, 4044, 4060, 4059, 4047 3028R & 3027R combined, along with appropriate highway improvements.</p> <p>Grade II listed Mill Farm House is within 50m of the south east boarder buildings. Grade II listed The Oaks and The Lilacs are nearby to the south, however these are separated from the site by existing development at Mill Lane. The site borders Spixworth Bridge Meadows County Wildlife Site to the east and is within 300m of Horsham Meadows County Wildlife Site to the west - ecology comments received suggest consideration of enhancements to link County Wildlife Sites, and woodland to the north recommended. (with GNLP 3028R, GNLP4046; GNLP 4047 has potential to reduce connectivity - connectivity and habitat for badgers should be considered as records located either side of these site proposed allocations. In combination with GNLP 3027R potential to fragment habitats as gap between settlements reduced.</p> <p>This site is a significant increase in size to the previously submitted boundary, a large proportion of the site is within Flood Zone 3 to the south/south east due to the river running through the site and there is risk of flooding from surface water</p>

across the north, east and south boundaries, however development could be located on land in flood zone one adjacent to Manor Road. Mature trees and hedging on the boundaries of the site along with utility poles and a utility building at the western border of the site require consideration. Other considerations include the proximity to Norwich airport. There are no concerns over contamination, ground stability or quality of agricultural land. This is an enlarged boundary to a previously submitted site. The original site has already been counted towards the land availability assessment, therefore an additional 7.92ha is considered suitable for the land availability assessment.

FURTHER COMMENTS

Highways

Subject to Transport Assessment and implementation of any agreed mitigation measures. Access strategy to be agreed with Highway Authority and may require local improvements. Cycleway/footway required at Manor Road site frontage. No vehicular access to Mill Lane. Community car park required to support adjacent school and crematorium / ensure Manor Road remains clear of parked vehicles, enabling safe access to the site. Suitable pedestrian crossing required. Perhaps consider a comprehensive access strategy for 0482R, 4044, 4060, 4059, 4047, 3028R & 3027R combined, along with appropriate highway improvements.

Development Management

None

Lead Local Flood Authority

AMBER – surface water flood risk on site, significant mitigation required for severe constraints, significant information required at a planning stage. No internal & external flooding on site but both within 500m. Watercourses – main river on site and ordinary watercourse and main river within 100m. No surface water sewer system on site or within 100m. No Source Protection Zone, in Norfolk Rivers IDB. The site predominantly has superficial deposits of clay, silt, sand and gravel. Comments on the infiltration potential are dependent on a complete geotechnical investigation.

Watercourses and main river on site and within 100m of the site boundary are within an IDB area. The site is affected by a moderate/major flow path that must be considered when reviewing the site. There is a reasonable percentage of the site that is not affected by flood risk and deemed developable. The LLFA would recommend a more detailed review of the site.

PLANNING HISTORY:

None

BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION

Original submission:

- None (Site submission form and boundary plan)

Revised site:

- (Revised boundary 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.

New and revised sites to be considered for allocation:

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Horsham & Newton St Faith				
Land to the west of West Lane	GNLP0125R	2.31	50 dwellings	Through the Reg 18C consultation the promoter suggested a slightly larger site for up to 50 dwellings. This is the site which has been chosen for allocation as the Sustainability Appraisal showed no difference in impact between the two sites and discussions with Children's Services concluded that the school could accommodate the children from an additional 20 dwellings.

New and revised sites considered to be unreasonable for allocation:

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
Horsham & Newton St Faith				
Land east of Old Norwich Road	GNLP0482R	5.44	Housing	As originally promoted this is a sizeable site which if developed in its entirety would be prominent in the landscape and too large for the identified capacity of the cluster. Further consideration was given to the revised proposal submitted through the Regulation 18C consultation, which is still considered to be unreasonable due to the flatness of the landscape in this location.
Land off Manor Road	GNLP1054R	1.55	Housing	Although adjacent to existing allocation HNF1 this site is not considered to be reasonable for allocation due to landscape character and neighbour amenity

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				issues. An appeal on the site was dismissed in December 2019 due to the effect of the proposed development on the character and appearance of the area with specific regard to the setting of listed buildings, the effect on neighbouring occupiers with specific regard to noise disturbance and whether the site is in an appropriate location for development.
East of Manor Road	GNLP3027R	10.55	Housing	This site as originally submitted was considered to be unreasonable for allocation for flood risk reasons. The site was almost wholly covered by surface water flood risk which would affect the developable area. The site was revised through the Reg 18C consultation to include further land to allow for water attenuation/drainage and green space but as no specific details or layout proposals have been submitted the site is still considered to be unreasonable for allocation.
North of Meadow Farm Lane	GNLP3028R	12.05	Housing	This site is considered to be unreasonable for allocation as vehicular access would be from narrow roads and there is no safe walking route to St Faiths Primary School. The site was revised through the Reg 18 C consultation but no additional information has been submitted regarding how these issues may be overcome so it is still considered to be unreasonable for allocation.
Off Manor Road	GNLP4027	0.70	12+ dwellings	This site has previously been submitted under reference GNLP0246 with a slightly larger boundary 0.78ha. The site was considered to be unreasonable for allocation as it was thought to

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				be unlikely to meet the minimum 12-15 dwelling threshold for allocation if built at a similar density to reflect the existing built form. This submission is for a slightly smaller site with no detailed layout proposals to demonstrate how 12-15 dwellings could be accommodated on site so it continues to be considered unreasonable for allocation.
West Farm	GNLP4042	12.28	Housing	This site is considered to be unreasonable for allocation as there is no safe walking route to St Faiths Primary School, it is remote with no network access and would require highway improvement on third party land beyond the site. Noise issues from proximity to proposed employment site, the NDR and Norwich Airport.
West Farm	GNLP4043	7.79	Housing	This site is considered to be unreasonable for allocation as there is no safe walking route to St Faiths Primary School, it is remote with no network access and would require highway improvement on third party land beyond the site. Noise issues from proximity to proposed employment site, the NDR and Norwich Airport.
West Farm	GNLP4044	2.67	Housing	This site is not considered to be suitable for allocation as there is currently no safe walking route to school. Whilst it may be possible to provide footway connections through development it is considered that development here would push the boundaries of Horsham St Faith further out into the countryside and be particularly prominent in the flat landscape. The site could potentially be developed as part of a comprehensive access

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				strategy with GNLP0482R and GNLP4060 but this would lead to a form of development far larger than the capacity of the cluster.
Meadow Farm Lane, Coltishall Lane	GNLP4046	6.50	Housing	This site is not considered to be suitable for allocation as a standalone scheme as it would be contrary to the form and character of the settlement. It could be considered with other sites as part of a comprehensive access strategy but the resulting development would be too large for the capacity of the cluster.
Coltishall Lane/ Spixworth Road	GNLP4047	8.90	Housing	This site is not considered to be suitable for allocation as a standalone scheme as it would be contrary to the form and character of the settlement. It could be considered with other sites as part of a comprehensive access strategy but the resulting development would be too large for the capacity of the cluster.
North of Spixworth Road	GNLP4059	9.36	TBC	This site is not considered to be suitable for allocation as a standalone scheme as it would be contrary to the form and character of the settlement. It could be considered with other sites as part of a comprehensive access strategy but the resulting development would be too large for the capacity of the cluster.
South of Spixworth Road	GNLP4060	6.98	TBC	This site is not considered to be suitable for allocation as a standalone scheme as it would be contrary to the form and character of the settlement. It could be considered with other sites as part of a comprehensive access strategy but the resulting development would be too large for the capacity of the cluster.

FINAL CONCLUSIONS FOR THE REGULATION 19 VERSION OF THE PLAN

Site assessments prior to the Regulation 18C consultation

Up to the Reg 18C consultation there were 11 sites promoted for residential/mixed use totalling around 60 hectares of land. The outcome of initial site assessment work (which is detailed in part 1 of this booklet) was to prefer site GNLP0125 for 20-30 dwellings on a much smaller boundary than promoted to overcome capacity issues at the school and historic environment concerns. This preferred site was favoured over other sites promoted in the cluster because of its accessibility to the A140, proximity to commercial development and safe walking route to St Faiths Primary School and was consulted on as part of the Regulation 18C draft plan consultation. It is recognised that the site has historic environment sensitivities but it is thought that these can be overcome through policy mitigations.

Summary of comments from the Regulation 18C draft plan consultation

Through the Regulation 18C consultation a number of comments were received regarding sites in the Horsham St Faith cluster. The main issues raised were historic environment concerns regarding the preferred site (detailed in part 2 above). These comments have resulted in the policy wording being strengthened to refer to the need for an Historic Impact Assessment but did not result in any changes to the selection of the site preferred for allocation.

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

A total of 8 new sites and 5 revised sites were submitted through the Regulation 18C consultation totalling around 87 hectares of land, including a proposed extension to site GNLP0125 to accommodate up to 50 dwellings., as well as a number of large sites to the east of the village. All the new and revised sites were subject to the same process of assessment as the earlier sites (detailed in part 3 of this booklet). The conclusion of this work was that the majority of new sites were unreasonable for allocation as they were too large for the scale of development required in the cluster. After consideration and engagement with Development Management colleagues, highway and Children's Services the extension to preferred site GNLP0125 was considered to be appropriate because the Sustainability Appraisal showed no difference in the impact of the revised sites proposal over the preferred site and Children's Services confirmed that the school could accommodate the number of children that would be generated by an additional 20 dwellings.

N.B Site GNLP0085 was revised during the Regulation 18C consultation and has now become small site GNLP4005.

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 [here](#)) highlighted a number of negative and positive impacts for the sites in Horsham St Faith but showed how broadly all sites promoted scored similarly.

The Sustainability Appraisal shows how site GNLP0125 has changed from the original large submission to the smaller site preferred at Reg 18C and slightly larger revised site then submitted. It clearly shows how a smaller development on GNLP0125 scored much better through the SA, with there not being much difference between the scoring of the Reg 18C site and the revised site. Site GNLP0125 scores a double negative for education and a double positive for population and community. Other more minor issues flagged up for site GNLP0125 through the SA were related to historic environment impacts but it is considered that these can be addressed through policy.

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 Horsham St Faith is to allocate site GNLP0125 for 50 dwellings on the revised boundary promoted through the Regulation 18C consultation (the range of dwellings in villages was dropped after the Regulation 18C consultation) in addition to carried forward allocated HNF1. Other sites are rejected for allocation as in general they were considered to be either too small to accommodate the minimum allocation requirement or too large and out of keeping with the scale of the settlement with resultant landscape impacts.

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.

