

Hierarchy	URBAN FRINGE
Settlements:	Colney, Cringleford, Bawburgh, Stoke Holy Cross, Trowse, Sprowston, Felthorpe, Hellesdon, Easton,

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

STAGE 1 – LIST OF SITES PROMOTED IN THE SETTLEMENT

LIST OF SITES TO BE CONSIDERED FOR COMMERCIAL/EMPLOYMENT

Address	Site Reference	Area (ha)	Proposal
University of East Anglia, Colney	GNLP0140-C	4.20	UEA Triangle site, Watton Road
Land at Colney Lane, Cringleford	GNLP0244	7.34	University related
South-east of Norfolk & Norwich University Hospital (Cringleford)	GNLP0331R-A	14.80	Employment-led mixed use
south of Norwich Research Park extension	GNLP0331R-B	1.26	Employment
South of Norwich Research Park extension	GNLP0331R-C	5.59	Employment
Costessey Park and Ride, Bawburgh	GNLP0376	1.05	Employment & Commercial use
Land west of Ipswich Road, Keswick (Cringleford)	GNLP0497	6.90	Employment
A140/Mulbarton Road, Keswick (Cringleford)	GNLP3047	16.10	Employment
Land at junction Loddon Road/Bungay Road (Stoke Holy Cross/Poringland)	GNLP3051	7.91	Park and Ride Site
Land at and adjacent to Whitlingham Country Park	GNLP3052	200.00	Recreation and tourism associated with

			the existing Country Park
White House Farm	GNLP3024	6.04	Multi Use Community Hub
Land off Norwich Northern Distributor Road. Felthorpe	GNLP0465	5.04	Commercial
West of Hellesdon Park Industrial Estate, Hellesdon	GNLP2142	5.71	Extension to industrial estate, burial ground, open space, car park
Total area of land		281.94	

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

Address	Site Reference	Area (ha)	Proposal
University of East Anglia, Colney	GNLP0140-A	2.50	Proposed clubhouse, pavilion and pitch site
University of East Anglia, Colney	GNLP0140-B	0.80	Proposed car park extension
Norfolk Showground, Easton	GNLP2074	76.66	Food, farming, leisure, tourism, recreation, arts, exhibition
Land East of Reepham Road/North of Arden Grove School, Hellesdon	GNLP1019	11.08	Open Space
Land adjacent to St Marys Church, Low Road, Hellesdon	GNLP1020	1.26	Burial Ground
Rear of Heath Crescent, Prince Andrews Road, Hellesdon	GNLP1021	2.07	Leisure
Total area of land		94.37	

LIST OF SITES TO BE CONSIDERED FOR COMMUNITY USES

Address	Site Reference	Area (ha)	Proposal
Sprowston Park and Ride	GNLP0383	5.19	High school
Total area of land		5.19	

INFRASTRUCTURE/TRANSPORT/RECREATION AND LEISURE

Site Reference	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
GNLP0140A	n/a													
GNLP0140B	n/a													
GNLP2074	Green	Green	Green	Green	Amber	Amber	Green	Green	Green	Amber	Amber	Green	Green	Green
GNLP3051	n/a													
GNLP3052	n/a													
GNLP1019	n/a													
GNLP1020	n/a													
GNLP1021	n/a													

COMMUNITY USES

	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														
GNLP0383	n/a													

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

Site Reference	Comments
GNLP0140-A - C	<p>General comments: Objections raised concerns regarding loss of green space, impact on the wellbeing on humans and wildlife and flood risk. The large number of development sites outside of the valley being proposed should more than meet the expected growth needs for housing and employment, without risking damage to what local plans identify as a Strategic Green Infrastructure Corridor. Do not allow grant the status of Development Site above and beyond what has already been granted re Norwich Rugby club. These sites are in a protected area. The rugby building, and pitch is too close to the river, will mean putting in a road in place of a well-used used car free, cycle/pedestrian path currently exists from UEA across to John Innes and the hospital.</p> <p>Sport England comments: Sport England supports this allocation which is the subject of an existing planning consent for new sports facilities.</p>
GNLP0244	<p>General comments: Objections raised concerns as the site is within the ‘strategic green infrastructure corridor’ that is important for the environment and local community. Loss of green space had impacts on the Yare Valley Green Infrastructure Corridor. Other concerns include (1) flood risk, (2) loss of local wildlife, (3) destruction of woodland, (4) traffic congestion, (5) road safety, (6) site is essential woodland for physical and psychological health, (7)</p> <p>One comment submitted in support of site. Report submitted consisting of the assessment of deliverability. The redevelopment of Congregation Hall has been a long-term ambition of the UEA, with the redevelopment first mentioned in the 2010 Development Framework Strategy. It is recognised that the Hall does not fulfil its potential at present, and the comprehensive redevelopment of the site would seek to implement a new conference/events space which acts as a focal point and reflects the architectural integrity of the wider Campus.</p> <p>Site GNLP0244 should be allocated for UEA related uses, NRP related uses and potentially residential development. As set out in the full Representation, the site is suitable, available, achievable and viable and is therefore deliverable. It represents a sustainable location for development and is capable of delivering a modest quantum of development.</p> <p>Norfolk Wildlife Trust comments: This site is currently plantation woodland and part of the Yare Valley GI corridor. It should not be allocated, for this reason.</p>

Norwich Green Party comments:

GNLP 0244 and 0461 - We consider that the allocation of these sites for development would be inappropriate. The existing woodland should be protected, and green space protected by a Greenbelt policy. This also forms part of the strategic gap between Norwich and Cringleford that we feel is necessary for them to be seen as separate settlements.

Colney Parish Council comments:

The UEA plantation area adjacent Colney Lane was originally conceived as a woodland of mainly broadleaved trees. Site GNLP0244, adjacent the playing fields, is scheduled for a variety of uses and would involve the further removal of trees on this designated green field location. All of this would be in addition the trees planned to be felled to create rugby pitches in the 2016/0233 application for development of the much-prized Yare Valley. These proposals would reduce the effectiveness of the plantation as a water storage area as identified by the Environment Agency potentially increasing future flood risks of the Yare. This area should be left alone.

Norfolk Geodiversity Partnership comments:

We wish to object to this site proposal on the grounds of negative impact on the landscape character and countryside setting of the Wensum Valley. Furthermore, we note that it includes a chalk pit of great geological interest, listed in the Norfolk Geodiversity Audit as site SNF28. It is significant exposure of the Chalk of the Pre-Weybourne Chalk sub-division with a rich fossil fauna (Wood 1988, Gale 2014). If development were granted we urgently request that plans be made conditional upon providing chalk exposures as part of a nature conservation area for Green Infrastructure, supporting wildlife as well as geology.

Cringleford Parish Council comments:

A large part of the site lies in Cringleford. The Parish Council endorses the observation made on the site for the GNLP but notes that it is 'proposed for university related uses and potentially housing'. 'University related' is unspecified but the granting by South Norfolk District Council of planning permission on it for a rugby club and extensive playing fields means that some of the woodland is scheduled for removal and the slopes sculpted to provide pitches for rugby football. The Parish Council opposed this development and regrets the incursion of the valley. The Parish Council is opposed to the development of the rest of the site for housing or any other purpose. Housing would not only add to the emerging urban character of the parish, which most parishioners see as undesirable, but would also further compromise access to the Yare Valley, further detract from the landscape of the valley

	and remove ever diminishing and much needed green space from the south west fringes of Norwich.
GNLP0331R-A	<p>General comments: Objections raised concerns regarding site is an important wildlife link between the Yare Valley and the Bypass Landscape Protection Zone, removal of a popular walking location, no footpaths and site serves as a valuable part of any future protection of wildlife migration routes.</p> <p>Colney Parish Council comments: We submit that all these additional sites be removed from the putative allocation procedures under Regulation 18 and that what remains of this beautiful and biodiverse Valley as well as Colney Parish be left alone as is the intention under existing planning procedures. The only purpose of reviewing these landscape policies is to strengthen them. See full submission.</p>
GNLP0331R-B	<p>General comments: One objection raised concerns regarding site falls within the Yare Valley corridor and are covered by the NSBLPZ to give protection for a wildlife corridor.</p> <p>Colney Parish Council comments: We submit that all these additional sites be removed from the putative allocation procedures under Regulation 18 and that what remains of this beautiful and biodiverse Valley as well as Colney Parish be left alone as is the intention under existing planning procedures. The only purpose of reviewing these landscape policies is to strengthen them. See full submission.</p>
GNLP0331R-C	<p>General comments: One objection raised concerns regarding site falls within the Yare Valley corridor and are covered by the NSBLPZ to give protection for a wildlife corridor.</p> <p>Colney Parish Council comments: We submit that all these additional sites be removed from the putative allocation procedures under Regulation 18 and that what remains of this beautiful and biodiverse Valley as well as Colney Parish be left alone as is the intention under existing planning procedures. The only purpose of reviewing these landscape policies is to strengthen them. See full submission.</p>
GNLP0376	No comments submitted
GNLP0497	<p>General comments: One comment in support of site. This submission is made in respect of Land West of Ipswich Road, East of B1113 (Ref: GNLP0497) on behalf of MAHB Capital the promoters of the site.</p>

	<p>The site presents the opportunity, in combination with an existing allocation (KES2), to provide land for additional employment floorspace in a sustainable location and contribute to the challenge of providing 45,000 jobs in the Greater Norwich Area over the plan period. It is considered that the site, in combination with KES2, would have the capacity to deliver in the region of 30, 000 sq. meters of employment floorspace. A development of this nature could deliver circa 1000 new jobs. See full report.</p> <p>One comment made said at the south Norfolk Development Management Committee of Wednesday 21st June 2017 this application was firmly rejected by the Committee on the basis 'It is not considered that the material considerations of job creation or the delivery of the proposed highway works outweigh the identified policy conflict'. The availability of significant evidence from the GNLP Evidence Base now confirming that there is no need for this additional capacity for job creation, makes the case for rejection of this application overwhelming. The GNLP should respect the decision of South Norfolk.</p> <p>Objections raised concerns regarding loss of a green zone and wildlife. Site has flood risks and is a protected area. The marshes and land adjacent to them are enjoyed by many people and animals and provide a beautiful respite from the city for everyone to enjoy. With so many more appropriate places to build identified it is unfathomable to damage this beautiful sport and build close to the protected area and yare valley.</p> <p>Keswick and Intwood Parish Council comments: Keswick and Intwood Parish Council believe GNLP 0497 should be refused for reasons already provided in response to Planning Application 2016/0764 and 2017/2794 (currently being considered) both being analogous to GNLP 0214. Planning Application 2016/0764 was refused because the proposed development would have resulted in a significant adverse impact on the Norwich Southern Bypass Landscape Protection Zone (NSBLPZ), and the landscape setting of Norwich by the extent of the application site and the identified harm to the openness of the NSBPLZ when viewed from the west. This conflicts with Policy DM4.6 of the South Norfolk Local Plan 2015.</p>
GNLP3047	<p>No comments submitted as site submitted during stage B consultation.</p>
GNLP2074	<p>General comments: Objections raised concerns regarding road safety, no footpaths, unsuitable roads and pollution.</p> <p>Costessey Town Council comments: Refuse development for housing on this triangle site. Only access to this site is onto Long Lane. There are always tailbacks onto the</p>

	<p>Longwater Interchange southern roundabout at peak times and when there are events at the Showground. Costessey TC could support a regional facility such as a concert hall, Exhibition Centre (e.g. like the NEC in Birmingham) on this site, but NOT residential development or light industrial use. CTC would prefer to keep the use as a Showground as it is an important facility in East Anglia. NB: Food hub is proposed further out along the A47 with potentially a new town. CTC could not support new dwellings further dwellings on this site as the road access is difficult as evidenced by the congestion on the existing Longwater interchange.</p>
GNLP3051	No comment submitted as site submitted during stage B consultation.
GNLP3052	No comment submitted as site submitted during stage B consultation.
GNLP0383	No comments submitted
GNLP0465	<p>General comments: The site could be considered with more detailed plans.</p> <p>There are concerns about traffic due to the lack of nearby petrol stations and traffic bunching. Would prejudice a 'no development' policy along the NDR and development would undo the objective of freeing traffic on radial roads and providing sustainable transport in the NDR DCO. There would be extra traffic down the narrow Brands Lane which is unsuitable. The site is isolated so would discourage residents from integrating into the community. No public transport or facilities. Too close to Drayton Dreway.</p> <p>Site is outside the settlement limit and adjacent to Common Land and Green Infrastructure land (which supports walking/cycling etc.). It is contrary to Policy 8 of the Drayton Neighbourhood Plan. Location is isolated which would discourage residents from integrating into the community.</p> <p>Objections raised regarding potential development. The green space and natural environment should be protected for wildlife and recreation. Rather than reducing its size every effort should be made to improve and protect it from encroaching development.</p> <p>Drayton Parish Council comments: Subject to receipt of more detailed plans and proposals the site could be given consideration by the Parish Council. The site is outside the settlement limit and is adjacent to Drayton Dreway which is Common Land and adjacent to Green Infrastructure land which is contrary to policy 8 of the Drayton Neighbourhood Plan. Since the opening of the NDR this has become a valuable walking</p>

	<p>route (G1) and Drayton Parish Council would wish to avoid developing this area.</p> <p>Felthorpe Parish Council comments: Felthorpe Parish Council objects to the proposals for the following reasons: the development would cause extra traffic down Brands Lane which is a narrow country lane and already unsuitable for the amount of traffic using it; the location would be removed from the main parish and so parishioners would find it difficult to integrate into the community; there would be no facilities or buses for the new properties; the site is close to Drayton Drewray and would affect these vital wildlife sites.</p>
GNLP2142	<p>General comments: One objection made on the grounds it would ruin the character of Hellesdon, already having lack of facilities and infrastructure.</p> <p>One comment welcomes the allocation of land to burial ground and parking for parish church. However, have reservations on the use of this steeply sloping site for industrial use as it will be detrimental to the landscape views from the Wensum Valley.</p> <p>One comment in support of site. This area of industrial units is a local success story in terms of employment. It does not impact upon land the community uses and could have minimal visual impact. If sensible, sensitive proposals were brought forward I would be in favour.</p>
GNLP1019	<p>General comments: Objections raised concerns regarding traffic congestion, lack of country walk areas, pollution, services already oversubscribed, impacts on wildlife, poor road systems, impact on existing infrastructure, ruining the landscape and is on the flight path to Norwich Airport.</p> <p>Comments submitted in support of site on the grounds the site is used for recreational use not housing.</p> <p>Drayton Parish Council comments: We would support this site for recreational purposes as requested by Hellesdon Parish Council but would object if this site was proposed under GNLP0332 as housing.</p> <p>Hellesdon Parish Council comments: Cottinghams park and allotments are Hellesdon amenities and should not be considered for development under GNLP0332. Designation as recreational land should not be changed.</p>
GNLP1020	<p>General comments:</p>

	<p>Objections raised concern regarding bad access, distance from Norwich Airport impacting take off flight lines. Other concerns include traffic congestion, pollution, lack of services to support development and loss of wildlife.</p> <p>Comments in support of proposal as burial land.</p> <p>Hellesdon Parish Council comments: Designation as a burial ground should not be changed.</p>
GNLP1021	<p>General comments: Objections raised concerns regarding traffic congestion, oversubscribed services particularly schools, loss of green spaces, pollution and ruin Jarrold's sports ground. Land is designated as recreational and should remain so. Under the neighbourhood plan all green spaces should be protected.</p> <p>Comments in support of site for recreational land.</p> <p>Site submitted on behalf of Hellesdon Parish Council. The site is in private ownership, but before its closure it was a Sportsground for a local company offering Football pitches, tennis courts, a full-size bowling green and a club house. Hellesdon is deficient per head of population in formal recreational facility sites by some 12 hectares, and as a Parish Council we believe that this is the last piece of green open recreational space within the parish periphery which needs to be kept for the resident's amenity. The parish council fully support this site allocation proposal.</p> <p>Sport England support the retention of this site for sport, given the deficiencies of provision in the local area. It is capable of accommodating sports pitches, a bowling green, tennis courts and clubhouse/community centre. Its allocation would be in line with Sport England planning objectives to protect existing sports facilities, and NPPF (Paras 73-74).</p> <p>Hellesdon Parish Council comments: This is virtually the last green area in Hellesdon and should be retained as an amenity for the Parish of Hellesdon which has below a satisfactory level of formal recreation land.</p>
GNLP3024	<p>No comment submitted as site submitted during stage B consultation.</p>

STAGE 4 – DISCUSSION OF SUBMITTED SITES

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

Commercial/Employment

Colney

University of East Anglia, Colney GNLP0140-C, 4.2 ha, UEA Triangle site, Watton Road.

GNLP0140-C coincides with the existing research park allocation COL2 in the adopted South Norfolk local plan which is longstanding. Permission was given in 2011 for an innovation centre and associated car parking (ref: 2008/0736). COL2 is allocated for science park development, hospital expansion or other development which would complement these uses. Site GNLP0140-C seeks to maintain this allocation for these uses in the new local plan to 2038.

Cringleford

Land at Colney Lane, Cringleford, GNLP0244, 7.34 ha, University related.

Identified site constraints are the potential previous quarrying uses and that a small part of the site has a risk of surface water flooding. South Norfolk designations affecting the site are the Yare River Valley (ENV3) landscape and its use for open space (PPG17). Due to the landscape and open space designations GNLP0244 is not a reasonable option to consider further. This site is not preferred for allocation due to landscape constraints and concern about the loss of open space.

Development in this location would significantly change the character of the area

Colney

South-east of the Norfolk & Norwich University Hospital, GNLP0331R-A, 14.8 ha, Employment-led mixed use.

GNLP0331-A is being promoted for a mixed use extension to Norwich Research Park South, with 8.9 ha of land adjacent to the Norfolk and Norwich University Hospital proposed for employment use and 6.3 ha to the east being put forward for residential use. As an employment proposal constraints to GNLP0331R-A include the townscape and landscape considerations to the coalescence of Cringleford and the Norwich Research Park developments at Colney. High voltage powerlines cross GNLP0331R-A as well. As to residential development the Cringleford Neighbourhood Plan identified an area for approximately 1,200 new homes for which permissions are in place (outline application references 2013/1494 and 2013/1793) for up to 1,300. In addition to the land permitted for housing, further undeveloped land is identified within the Cringleford settlement boundary, and so negates the need for further residential land allocations. For these reasons GNLP0331R-A is considered an unreasonable alternative for further assessment.

Colney

South of Norwich Research Park (NRP) extension, GNLP0331R-B, 1.26 ha, Employment.

The site is bounded to the south by an internal access road that has already been permitted under the outline planning permission (ref: 2012/1880/O). To the immediate north and east is Norwich Research Park as permitted. This site is preferred for allocation to allow additional capacity up to 2038 for the continued growth of the allocated science park and hospital expansion proposals in the South Norfolk Local Plan (allocation reference COL 1).

Colney

South of Norwich Research Park extension, GNLP0331R-C, 5.59 ha, Employment. GNLP0331R-C is a proposal to extend Norwich Research Park by over 5 ha to the south of the existing 39 ha site (reference Policy COL 1). Norwich Research Park is a key location for employment expansion and so it is important that a permissive planning regime continues. This site is preferred for allocation to allow additional capacity up to 2038 for the continued growth of the allocated science park and hospital expansion proposals in the South Norfolk Local Plan (allocation reference COL 1).

Bawburgh

Costessey Park and Ride, Bawburgh, GNLP0376, 1.05 ha, Employment & Commercial use.

GNLP0376 is proposed for office and retail uses on part of what is currently the Costessey Park & Ride site. Access would be through the existing Park and Ride and is situated close to the Longwater junction of the A47. To justify a local plan allocation in this location more evidence is needed of likely end-user businesses who would bring forward development, as well as evidence to show there is no conflict with the overarching Transport for Norwich strategy. Without this information the site is not considered to be suitable for allocation at the current time.

Keswick

Land west of Ipswich Road, Keswick, GNLP0497, 6.90 ha, Employment.

GNLP0497 is situated between the A140 Ipswich Road and B1113. Constraints on the development include the need for highway improvements, some areas at surface water flood risk, landscape and heritage considerations. To the west is the Grade II Church of all Saints. The site is also within the Southern Bypass Landscape Protection Zone. Nevertheless, this site is preferred for allocation recognising that employment allocation KES2 from the South Norfolk Local Plan now has planning consent (reference 2017/2794) on a larger boundary that incorporates this site. The carried forward allocation will be redrawn accordingly.

Keswick

A140/Mulbarton Road, Keswick, GNLP3047, 16.10 ha, Employment.

The proposal consists of approximately 10 ha for potential development and 5 ha as a landscape buffer. Constraints on the development include the need for highway improvements, some areas at surface water flood risk, landscape and heritage considerations. To the west is the Grade II Church of all Saints. This site is not considered to be suitable for allocation as evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich. This area is outside the planning

application boundary for the extended KES2 allocation in the South Norfolk Local Plan.

Sprowston

White House Farm GNLP3024, 6.04, Multi Use Community Hub.

GNLP3024 is promoted for a variety of commercial and community uses (including retail, office, recreation, and leisure uses) to the east of Atlantic Avenue. The edge of GNLP3024 overlaps with the much larger parcel of land GNLP0132, and GNLP3024 also includes much of Round Hill Plantation. This proposal is considered to be a reasonable alternative for further consideration if additional community-based facilities are needed in this area of Greater Norwich to support the planned residential development. There is already a farm shop and commercial activities at White House Farm and residential development is located nearby, with additional residential growth planned for the future. However, it is not preferred for allocation at the current time as more evidence is required about the need for the proposal and how the development will come forward.

Felthorpe

Land off Norwich Northern Distributor Road. Felthorpe, GNLP0465, Commercial. GNLP0465 is proposed for fast food, retail, and petrol filling station uses, with access coming from the Broadland Northway (A1270) roundabout with Reepham Road. This site is not considered to be suitable for allocation as to justify a local plan allocation in this location more evidence would be required to demonstrate need and the likely end-user businesses who would bring forward development.

Hellesdon

West of Hellesdon Park Industrial Estate, Hellesdon, GNLP2142, Extension to industrial estate, burial ground, open space, car park
GNLP2142 is a proposal to extend the Industrial Park by 5 ha to the west of Alston Road, and provide open space, burial ground land and a car park for the Church. This site is not considered to be suitable for allocation as evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich. There is therefore no need to allocate any additional large-scale employment sites in the new local plan.

Infrastructure/Transport/Recreation and Leisure

Colney

University of East Anglia, Colney, GNLP0140-A, 2.5 ha, Clubhouse/Pavilion and Artificial Grass Match Pitch.

GNLP0140-A now has the benefit of planning permission and the principle of development has been established (ref: 2016/0233). Given the existing planning permission on the site it is not necessary to consider the site further for allocation. This site is not preferred for allocation as consent has already been granted under planning application reference 2016/0233.

Colney

University of East Anglia, Colney GNLP0140-B, 0.8 ha. Proposed car park extension.

GNLP0140-A now has the benefit of planning permission and the principle of development has been established (ref: 2016/0233). Given the existing planning permission on the site it is not necessary to consider the site further for allocation. This site is not preferred for allocation as consent has already been granted under planning application reference 2016/0233.

Easton

Norfolk Showground, Easton, GNLP2074, 76.66 ha, Food, farming, leisure, tourism, recreation, arts, exhibition uses.

This proposal is to continue the wide range of events and activities permissible at the Showground to include food, farming, leisure, tourism, recreation, arts and exhibition uses. Differences with the existing allocation COS 5 are to remove a parcel of land to the west that includes the Norfolk Family Golf Centre and to add an area of land south of the A47 roundabout. Policy wording changes would allow more scope for the siting of permanent buildings and structures on the Showground site. This site is preferred for allocation, minus the small area of land to the east of Long Lane. It is proposed to revise the COS5 allocation from the existing South Norfolk Local Plan to remove the family golf centre and site GNLP2074 is preferred on the same boundary as the revised COS5 allocation. The policy wording has also been revised to take account of updated wording suggested by the site promoter.

Bixley

Land at junction Loddon Road/Bungay Road, GNLP3051, 7.91 ha, Park and Ride Site

This proposal is for an alternative park and ride site to that already identified as TROW2. However, use as a park and ride falls outside the remit of the Housing and Economic Land Availability Assessment and so the site has not been assessed against these criteria. The submission document hints at the possibility of retail, restaurant and petrol filling station uses, but no detail on such facilities is included as yet. This proposal is considered to be a reasonable alternative for further consideration. The future need for this site depends on the overarching Transport for Norwich strategy and the long-term plan for the provision of park and ride facilities to serve the local area.

Trowse

Whitlingham Country Park, GNLP3052

GNLP3052 is land southwards of Whitlingham Broad to the A47 Southern Bypass that is promoted for extending the Country Park. In total the proposal for Whitlingham Country Park measures 200 ha. This proposal is considered to be a reasonable alternative for further consideration but is not preferred for allocation at the current time as more details are required about the exact nature of the plans. The land promoted is also mostly within the Broads Authority administrative area, for which there are policies relating to Whitlingham Country Park.

Hellesdon

Land East of Reepham Road/North of Arden Grove School, Hellesdon, GNLP1019, Open Space.

Within the land promoted as GNLP00332R (and within the Hellesdon parish boundary) is the proposal GNLP1019 for open space. This site is the same as existing allocation HEL4 from the Broadland Local Plan. HEL4 is allocated for recreational open space. Site GNLP1019 seeks to maintain this allocation in the new local plan to 2038 and is therefore a preferred site.

Hellesdon

Land adjacent to St Marys Church, Low Road, Hellesdon, GNLP1020, Burial Ground.

This site is the same as existing allocation HEL3 from the Broadland Local Plan. HEL3 is allocated for an extension to the existing burial ground. GNLP1020 seeks to maintain this allocation in the new local plan to 2038 and is therefore a preferred site.

Hellesdon

Rear of Heath Crescent, Prince Andrews Road, Hellesdon, GNLP1021, Leisure. Differing proposals exist for the land behind Heath Crescent and Prince Andrew's Road that is known as the former Jarrolds Sports and Social Club. The proposal from Hellesdon Parish Council (reference GNLP1021) seeks to retain the whole site for sports, recreation, and open space. Whereas GNLP2173 is proposed by the owners for 35-50 dwellings, as well as to safeguard the bowls green, and possibly tennis courts. This proposal is considered to be a reasonable alternative but is not preferred for allocation at the current time as more information is needed about how the plans put forward by Hellesdon Parish Council sit alongside alternative plans for residential/recreational use put forward by the landowner.

Community Uses

Sprowston

Sprowston Park and Ride, GNLP0383, 5.19 ha, High School.

The North East Growth Triangle Area Action Plan identifies the possibility of requiring this site as a high school. Considerations to developing this site as a school includes highway improvements and possibly identifying alternative Park & Ride facilities. Other considerations are managing surface water flood risk across the site. The site is a strategically important and a reasonable alternative for a new high school. If the new high school is not needed, then the site will be reconsidered for housing.

STAGE 5 – SHORTLIST OF SITES FOR FURTHER ASSESSMENT

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

Address	Site Reference	Area (ha)	Proposal
University of East Anglia, Colney	GNLP0140-C	4.20	UEA Triangle site, Watton Road
South of Norwich Research Park (NRP) extension	GNLP0331R-B	1.26	Employment.
South of Norwich Research Park extension	GNLP0331R-C	5.59	Employment
Sprowston Park and Ride	GNLP0383	5.19	High School
Land west of Ipswich Road, Keswick (Cringleford)	GNLP0497	6.90	Employment
Land East of Reepham Road/North of Arden Grove School, Hellesdon	GNLP1019	11.08	Open Space
Land adjacent to St Marys Church, Low Road, Hellesdon	GNLP1020	1.26	Burial Ground
Rear of Heath Crescent, Prince Andrews Road, Hellesdon	GNLP1021	2.07	Leisure
Norfolk Showground, Easton	GNLP2074	76.66	Food, farming, leisure, tourism, recreation, arts, exhibition uses
White House Farm	GNLP3024	6.04	Multi Use Community Hub
Land at junction Loddon Road/Bungay Road	GNLP3051	7.91	Park and Ride Site
Land at and adjacent to Whitlingham Country Park	GNLP3052	200	Recreation and tourism associated with the existing Country Park
Total area of land		328.16	

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

Of the sites promoted for non-residential use seven are favoured for allocation. Three of which, sites GNLP0140-C, GNLP0331R-B, and GNLP0331R-C relate to the strategically important developments associated to the University of East Anglia and Norwich Research Park. Adding these sites to the local plan is considered important in allowing continued growth up to 2038 of the allocated science park and hospital expansion proposals.

The four other preferred non-residential allocations formalise existing uses and permitted development proposals. In Keswick preferring GNLP0497 reflects planning permission 2017/2794 and carries forward the existing KES 2 allocation. In Hellesdon the preferred approach is to carry forward existing open space allocation HEL4 (GNLP1019) and burial land allocation HEL3 (GNLP1020). In Costessey and Easton the policy safeguarding the Showground remains (COS 5/GNLP2074) but without the land associated to the family golf centre. As suggested by the site promotor, some updates are proposed to the Showground COS 5 policy, but the suggestion for a small area of additional land east of Long Lane is not included.

A total of five sites are considered reasonable but are not proposed for allocation at present, due to queries over the strategic need or requiring more information about the exact development proposed. These are: the reserving of land for a new high school in Sprowston (GNLP0383); the retention of recreation land in Hellesdon (GNLP1021), the need for additional commercial and community uses also in Sprowston (GNLP3024), the need for a new park & ride site off the A146/B1332 (GNLP3051); and, the detail of proposals to expand Whitlingham County Park (GNLP3052).

Of the remaining sites considered unreasonable for allocations reasons relate to: townscape and landscape considerations (GNLP0244, GNLP0331R-A); that the site is not required for allocation to fulfil the objectives of the local plan (GNLP0376, GNLP0465, GNLP2142, and GNLP3047); or, that the site in question already benefits from having planning permission so needs no further consideration (GNLP0140-A and GNLP0140-B).

Preferred Sites

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Colney				
South of Norwich Research Park extension	GNLP0331R-B	1.26	Employment	This site is preferred for allocation to allow additional capacity up to 2038 for the continued growth of the allocated science park and hospital expansion proposals in the South Norfolk Local Plan (allocation reference COL 1).
South of Norwich Research Park extension	GNLP0331R-C	5.59	Employment	This site is preferred for allocation to allow additional capacity up to 2038 for the continued growth of the allocated science park and hospital expansion proposals in the South Norfolk Local Plan (allocation reference COL 1).
University of East Anglia, Colney	GNLP0140-C	4.20	UEA Triangle site, Watton Road	This site is the same as existing allocation COL2 from the South Norfolk Local Plan. COL2 is allocated for science park development, hospital expansion or other development which would complement these uses. Site GNLP0140-C seeks to maintain this allocation for these uses in the new local plan to 2038.
Costessey				
Norfolk Showground, Easton	GNLP2074 (part)	76.66	Food, farming, leisure, tourism, recreation, arts, exhibition	This site is preferred for allocation, minus the small area of land to the east of Long Lane. It is proposed to revise the COS5 allocation from the existing South Norfolk Local Plan to remove the family golf centre and site GNLP2074 is preferred on the same boundary as the revised

				COS5 allocation. The policy wording has also been revised to take account of updated wording suggested by the site promoter.
Cringleford (including Keswick)				
Land west of Ipswich Road, Keswick	GNLP0497	6.90	Employment	This site is preferred for allocation recognising that employment allocation KES2 from the South Norfolk Local Plan now has planning consent (reference 2017/2794) on a larger boundary that incorporates this site. The carried forward allocation will be redrawn accordingly.
Drayton				
NO PREFERRED NON-RESIDENTIAL SITES				
Easton and Honingham				
NO PREFERRED NON-RESIDENTIAL SITES				
Hellesdon				
Land East of Reepham Road / North of Arden Grove School	GNLP1019	11.08	Recreational open space	This site is the same as existing allocation HEL4 from the Broadland Local Plan. HEL4 is allocated for recreational open space. Site GNLP1019 seeks to maintain this allocation in the new local plan to 2038.
Land adjacent to St Marys Church, Low Road, Hellesdon	GNLP1020	1.26	Burial Ground	This site is the same as existing allocation HEL3 from the Broadland Local Plan. HEL3 is allocated for an extension to the existing burial ground. GNLP1020 seeks to maintain this allocation in the new local plan to 2038.
Old Catton				
NO PREFERRED NON-RESIDENTIAL SITES				
Rackheath				
NO PREFERRED NON-RESIDENTIAL SITES				

Sprowston

NO PREFERRED NON-RESIDENTIAL SITES

Taverham and Ringland

NO PREFERRED NON-RESIDENTIAL SITES

Thorpe St Andrew

NO PREFERRED NON-RESIDENTIAL SITES

Trowse (including Bixley and Whitlingham)

NO PREFERRED NON-RESIDENTIAL SITES

Reasonable Alternatives

Address	Site Reference	Area (Ha)	Proposal	Reason for not allocating
Colney				
NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES				
Costessey				
NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES				
Cringleford (including Keswick)				
NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES				
Drayton				
NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES				
Easton and Honingham				
NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES				
Hellesdon				
Rear of Heath Crescent, Prince Andrews Road, Hellesdon	GNLP1021	2.07	Leisure	This proposal is considered to be a reasonable alternative for further consideration but is not preferred for allocation at the current time as more information is needed about how the plans put forward by Hellesdon Parish Council sit alongside alternative plans for residential/recreational use put forward by the landowner as site reference GNLP2173, which is also considered to be a reasonable alternative.
Old Catton				
NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES				
Rackheath				
NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES				
Sprowston				

Spowston Park and Ride	GNLP0383	5.19	High school (or housing if a school is not required).	The North East Growth Triangle Area Action Plan identifies the possibility of requiring this site for a new high school. Considerations to developing this site as a school include highway improvements and possibly identifying alternative Park & Ride facilities. Other considerations are managing surface water flood risk across the site as well as the overarching strategy for schools provision in this area of Greater Norwich. This site is of strategic importance and is considered to be a reasonable alternative for a new high school if required. If the new high school is not needed, then the site will be reconsidered for housing.
White House Farm	GNLP3024	6.04	Multi Use Community Hub	This proposal is considered to be a reasonable alternative for further consideration if additional community-based facilities are needed in this area of Greater Norwich to support the planned residential development. There is already a farm shop and commercial activities at White House Farm and residential development is located nearby, with additional residential growth planned for the future. However, it is not preferred for allocation at the current time as more evidence is required about the need for the proposal and how the development will come forward.
Taverham and Ringland				
NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES				

Thorpe St Andrew

NO REASONABLE ALTERNATIVE NON-RESIDENTIAL SITES

Trowse (including Bixley and Whitlingham)

Land at junction Loddon Road/Bungay Road, Bixley	GNLP3051	7.91	Park and Ride Site	This proposal is considered to be a reasonable alternative for further consideration. The future need for this site depends on the overarching Transport for Norwich strategy and the long-term plan for the provision of park and ride facilities to serve the local area. The submission document hints at the possibility of retail, restaurant and petrol filling station uses, but no detail on such facilities is included as yet.
Land at and adjacent to Whitlingham Country Park	GNLP3052	200.00	Recreation and tourism associated with the existing Country Park	This proposal is considered to be a reasonable alternative for further consideration but is not preferred for allocation at the current time as more details are required about the exact nature of the plans. The land promoted is also mostly within the Broads Authority administrative area, for which there are policies relating to Whitlingham Country Park.

Unreasonable Sites

Address	Site Reference	Area (Ha)	Proposal	Reason considered to be unreasonable
Colney				
University of East Anglia, Colney	GNLP0140-A	2.50	Proposed clubhouse, pavilion and pitch site	This site is not preferred for allocation as consent has already been granted under planning application reference 2016/0233.
University of East Anglia, Colney	GNLP0140-B	0.80	Proposed car park extension	This site is not preferred for allocation as consent has already been granted under planning application reference 2016/0233.
South-east of Norfolk & Norwich University Hospital	GNLP0331R-A	14.80	Employment-led mixed use	This site is not preferred for allocation due to townscape and landscape constraints. It currently acts as an area of open land between the hospital and existing/proposed residential development. There are also high voltage power lines running across the site.
Land at Colney Lane, Cringleford	GNLP0244	7.34	University related	This site is not preferred for allocation due to landscape constraints and concern about the loss of open space. Development in this location would significantly change the character of the area.
Costessey				
Costessey Park and Ride, Bawburgh	GNLP0376	1.05	Employment & Commercial use	To justify a local plan allocation in this location more evidence is needed of likely end-user businesses who would bring forward development, as well as evidence to show there is no conflict with the overarching Transport for Norwich strategy. Without this information the site is not considered to be suitable for allocation at the current time.
Cringleford (including Keswick)				

A140/Mulbarton Road, Keswick	GNLP3047	16.10	Employment	This site is not considered to be suitable for allocation as evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich. There is therefore no need to allocate any additional large-scale employment sites in the new local plan. This area is outside the planning application boundary for the extended KES2 allocation in the South Norfolk Local Plan.
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Drayton

Land off Norwich Northern Distributor Road. Felthorpe	GNLP0465	5.04	Commercial	This site is not considered to be suitable for allocation as evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich. There is therefore no need to allocate any additional large-scale employment sites in the new local plan.
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Easton and Honingham

NO UNREASONABLE NON-RESIDENTIAL SITES

Hellesdon

West of Hellesdon Park Industrial Estate, Hellesdon	GNLP2142	5.71	Extension to industrial estate, burial ground, open space, car park	This site is not considered to be suitable for allocation as evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich. There is therefore no need to allocate any additional large-scale employment sites in the new local plan.
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Old Catton

NO UNREASONABLE NON-RESIDENTIAL SITES

Rackheath

NO UNREASONABLE NON-RESIDENTIAL SITES

Sprowston

NO UNREASONABLE NON-RESIDENTIAL SITES

Taverham and Ringland

NO UNREASONABLE NON-RESIDENTIAL SITES

Thorpe St Andrew

NO UNREASONABLE NON-RESIDENTIAL SITES

Trowse (including Bixley and Whitlingham)

NO UNREASONABLE NON-RESIDENTIAL SITES

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

Colney

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Policy COL2 / GNLP0140-C Land rear/east of Institute of Food Research (IFR), Colney (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
UEA Estates & Buildings	Support	It has been demonstrated, the site is suitable, available, achievable and viable, and is deliverable within the plan period. Accordingly, the foregoing text demonstrates that this specific site is a suitable location for development, and the UEA support the GNLP's proposals to allocate the site for B1(b)		Comment noted	None

		Science Park development, hospital expansion and other proposals ancillary and complementary to these uses.			
Environment Agency	Comment	It appears that the site boundary has been drawn to exclude the current and future flood zones just to the east of the site, and therefore the sequential approach has been correctly applied.		Comment noted	No change
Historic England	Object	Suggested Change: We suggest that the policy be amended to include reference to the heritage assets and the need to conserve and where appropriate enhance them Suggested wording: Development should conserve or where appropriate enhance the significance of nearby heritage assets including Earlham Conservation Area and associated listed buildings (noting that significance may be harmed by development		It is accepted that the policy should acknowledge the potential for harm to the heritage asset(s) and the requirement for measures to address this	Add policy requirement to COL2 to read: 'Any development must conserve and enhance the significance of nearby heritage assets including Earlham Conservation Area and associated listed buildings to the west, including any

		within the setting of an asset) through appropriate landscaping, density and design.			contribution made to that significance by setting. This includes but is not limited to appropriate landscaping, density and design.
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Costessey

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Policy COS5- Site GNLP2074 Royal Norfolk Showground, Costessey (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Michael Haslam (Agent)	Support	We support policy COS5/GNLP2074 subject to the inclusion of the words in the policy and revisions as set out in the notes underneath the policy.		Support noted	None

Cringleford

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Policy KES2 – Site GNLP0497 Land west of Ipswich Road, Keswick (Carried Forward Employment Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	5
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 2 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
Anglian Water	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also 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
Norfolk Wildlife Trust		Our comments below relate to specific ecological concerns regarding allocations. In addition to the protection provided in Policy 2, we recommend that specific wording is included in the allocation	Consistent policy approach with regards to ecology.	Amend Policy to reflect the need for mitigation measures to protect the Harford Bridge Marshes CWS and Nature Reserve.	Amend policy requirements

		<p>policies to ensure accompanied by an ecological appraisal, with provision of biodiversity net gain and sufficient buffering and safeguarding space secured between the development and the wildlife site in perpetuity (potentially also delivering contributions to green infrastructure).</p> <p>KES2 this site is adjacent to Harford Bridge Marshes CWS and NWT Nature Reserve. Run-off from the development onto the CWS may be an issue and will need to be mitigated for.</p>		<p>Biodiversity Net gain requirement will be covered by Strategic policy and will apply to all sites</p> <p>The site now has planning permission.</p>	
Norwich Apex Limited/ Lanpro Services Ltd	Support	On behalf of Norwich Apex Limited (owners of Apex Business Park). Norwich Apex secured planning permission for Apex Business Park in 2018 from South Norfolk Council (2017/2794) and are currently assembling the required infrastructure for the site (including the		Support noted. The KES2 allocation is carried forward on the boundary of planning permission 2017/2794 which incorporate site GNLP0497.	None

		access, link road and strategic landscaping). Norwich Apex fully support this proposed policy allocation. The land presents the opportunity to provide additional employment floorspace in a sustainable location and in a sustainable manner and contribute to the challenge of providing jobs growth in the Greater Norwich Area over the plan period.			
Keswick and Intwood Parish Council	Object	<p>Keswick and Intwood PC believes no further approval should be granted until:</p> <ul style="list-style-type: none"> • the impact (visually and environmentally) of the current development can be assessed and its effect on Keswick village; • the commercial success of the site can be judged in relation to other space available; • the suitability of the road infrastructure to cope with traffic created is evaluated and especially 		Comments noted but the site now has planning consent (reference 2017/2794) on a larger boundary that incorporates site GNLP0497. The carried forward allocation will be redrawn accordingly.	None

		<p>the Low Road traffic scheme;</p> <ul style="list-style-type: none"> • there is evidence justification for the need of future employment land; • the material benefits of the job creation is shown to outweigh the adverse impact on the local area. 			
Historic England	Object	<p>Whilst there are no designated heritage assets within the site boundary, the grade II listed church of all Saints and remains of the Church of All Saints lies to the west of the site. Any development has the potential to impact upon the setting of these designated heritage assets. There is currently no mention of these assets within the policy or of the need to conserve and where appropriate enhance the significance of these nearby heritage assets.</p> <p>Suggested Change: Amend policy to include reference to the grade II</p>		It is accepted that the policy should acknowledge the potential for harm to the heritage assets and the requirement for measure to address this.	Amend Site Policy for KES2 to read: ‘Any development must conserve and enhance the significance of nearby heritage assets including the grade II listed church of All Saints and remains of the Church of All Saints to the west of the site, including any contribution made to that

		listed Church and remains of church and the need to conserve and where appropriate enhance the significance of these heritage assets.			significance by setting'.
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP3047 A140/Mulbarton Road, Keswick (Unreasonable Non-Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Lanpro Services Ltd	Object	The site is in a sustainable location and represents an important employment opportunity that should be included in the GNLP. We provide evidence that there will be clear demand for this site over the plan period and that it is needed to meet the growth ambitions of the plan.	Consider evidence presented	This site is not considered to be suitable for allocation as evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich. There is therefore no need to allocate any additional large-scale employment	None

				sites in the new local plan.	
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Hellesdon

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Policy HEL4 / Site GNLP1019 Land northeast of Reepham Road (Carried Forward Allocation)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Individual	Comment	Due to the location of HEL4 this allocation cannot fulfil its intention for open space. It is remote from the centre of Hellesdon and only residents on the northern boundary can access it easily, there is currently no provision for parking (and there is not likely to be due to the necessary costs). If HEL4 is to be counted as allocation for recreational open space then it must serve the majority of the		Hellesdon has an identified need for open space, this is a carried forward site adopted through the 2016 Broadland Local Plan therefore no changes are proposed .	None

		parish, much of which is over 1.5 miles distant. It is irresponsible to create a green space which you then need to use the car to drive to!			
CODE Development Planners Ltd	Object	<p>The landowners object to the allocation of 11.08 hectares for recreational open space.</p> <p>In our view, unless and until appropriate evidence is prepared, the draft allocation for recreational open space on 11.08 hectares of land at Reepham Road should be deleted. The landowners continue to encourage dialogue with all relevant parties, including the parish councils in order to identify the most appropriate provision of recreational open space to meet the requirements of various forms of outdoor recreation.</p>		<p>Hellesdon has an identified need for open space, this is a carried forward site adopted through the 2016 Broadland Local Plan therefore no changes are proposed .</p>	None

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP1021 Rear of Health Crescent, Prince Andrews Road, Hellesdon (Reasonable Alternative Site) *This site is also being considered for residential uses by landowner See GNLP 2173
TOTAL NUMBER OF REPRESENTATIONS:	40
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	37 Support, 0 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
Members of the Public (various)	Support	Support for the Open Space at this location in order to play bowls, football, tennis, running etc. This is an area of extensive growth therefore; open space would be widely needed. There is wide support for mental health and by utilising this land for open space it supports this objective.	Consider competing proposals for housing and open space on the site in the context the need for additional open space in Hellesdon	This proposal was considered as a reasonable alternative through the Regulation 18C consultation alongside alternative plans for residential use put forward by the landowner to allow for further consideration of both proposals. The decision has been taken not to allocate either site	None

				and leave it as 'white land' within the settlement boundary to be dealt with through the planning or Neighbourhood Plan process. The need for open space in Hellesdon put forward by the Parish Council is recognised but there does not seem to be any agreement between the Parish Council and the landowner about the future use of the site so the delivery for open space cannot be guaranteed.	
Hellesdon Parish Council	Support	There is clear support from the community and robust evidence demonstrating an undersupply of formal and informal open space at Hellesdon. The Neighbourhood Plan seeks to allocate this site for	Consider competing proposals for housing and open space on the site in the context the need for additional open space in Hellesdon	This proposal was considered as a reasonable alternative through the Regulation 18C consultation alongside alternative plans for	None

		<p>open space and suggest that BDC could assist through compulsory purchase of the land from Jarrolds.</p>		<p>residential use put forward by the landowner to allow for further consideration of both proposals. The decision has been taken not to allocate either site and leave it as 'white land' within the settlement boundary to be dealt with through the planning or Neighbourhood Plan process. The need for open space in Hellesdon put forward by the Parish Council is recognised but there does not seem to be any agreement between the Parish Council and the landowner about the future use of the site so the delivery for open</p>	
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				space cannot be guaranteed.	
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STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP2142 West of Hellesdon Park Industrial Estate, Hellesdon (Unreasonable Non-Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Brown & Co	Object	The site provides an opportunity to provide a sustainable employment area that would complement the existing industrial estate to the east. It would provide a range of units to encourage start-up business as well as the opportunity for existing business to move to larger premises. The site is		This site is not considered to be suitable for allocation as evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich.	None

		situated within the built-up area of Hellesdon and within easy reach of residential, commercial and retail uses. Development would provide community benefits through a community woodland and extension to the burial ground.			
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Sprowston

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP0383 Sprowston Park and Ride (High School or redevelopment for housing if a school is not required). (Reasonable Non-Residential Alternative)
TOTAL NUMBER OF REPRESENTATIONS:	1
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Sprowston Town Council	Comment	If the site is not to be redeveloped for a new school it should be allocated for civic use, and not (as proposed in the draft) for housing.		The site is allocated for High School / Institutional Use in OSRT AAP and this plan is not superseding the AAP	None

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP3024 White House Farm, Sprowston (Multi use Community Hub) (Reasonable Alternative – Non-Residential Site)
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	2 Support, 0 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Sprowston Town Council	Support	Supports that this site should be classified as a reasonable alternative non-residential site.		Support noted however the site is not proposed to be allocated in the Regulation 19 version of the plan as there is insufficient evidence about the need for the proposal and how the development will come forward.	None
Mr Oliver Gurney/ Mrs Nicole Wright [14312]	Support	On behalf of client support reasonable alternative for multi -use hub. We		Support noted however the site is not proposed to be	None

		currently have a thriving hub of local businesses (planning application No. 20160106). See full rep for details.		allocated in the Regulation 19 version of the plan as there is insufficient evidence about the need for the proposal and how the development will come forward.	
Environment Agency	Comment	This site intersects water courses therefore, should undertake a WFD compliance assessment for the watercourse receiving the runoff, maintain a buffer of 20 m between the watercourse and gardens and secure opportunities for riparian habitat restoration.		Comments noted but it is not intended to allocate this site in the Regulation 19 version of the plan.	None

Trowse (including non-residential at Bixley and Whitlingham)

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP3051 Land at junction of Loddon Road/Bungay Road, Bixley (Reasonable Alternative Site– Non-Residential – Park and Ride)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 1 Object, 1 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Member of the public	Comment	There are discrepancies between TROW2 not being carried forward for allocation of P&R in SNDC SA and suggested RA which may be allocated.	Check status of Park and Ride facilities around Norwich	This proposal was considered as a reasonable alternative in the Regulation 18C consultation to allow for further consideration of the long term plan for the provision of park and ride facilities through the Transport for Norwich Strategy. There are no plans for a park and ride	None

				site in this location therefore deliverability cannot be demonstrated and the site is not allocated.	
Member of the public	Object	Proposed site is adjacent to their property and would object if it went ahead as it would devalue their property.		Comment noted	None

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Site GNLP3052 Land adjacent to Whitlingham Country Park (Reasonable Alternative Site – Non Residential)
TOTAL NUMBER OF REPRESENTATIONS:	2
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 0 Object, 2 Comments

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION	DRAFT GNLP RESPONSE	PROPOSED CHANGE TO PLAN
Environment Agency	Comment	As a country park would be classed as water compatible development under Amenity open space, nature conservation and biodiversity then this would be an acceptable land use within the flood zones, including Flood Zone 3b, Therefore, it would be preferable if any associated built development is located within Flood Zone 1.		This proposal was considered as a reasonable alternative in the Regulation 18C consultation to allow for further consideration regarding the exact nature of the plans. As the majority of the site area is within the Broads Authority it is not considered appropriate for allocation in this	None

				plan. The Broads Authority Plan contains policies relating to Whitlingham Country Park.	
Crown Point Estate	Comment	The additional land at WCP should be safeguarded so that it can be called upon to support the additional population arising from new development in the locality. Formally safeguarding the site for leisure and open space purposes through policy will provide confidence in investment within the Park, to support this increasing demand.		This proposal was considered as a reasonable alternative in the Regulation 18C consultation to allow for further consideration regarding the exact nature of the plans. As the majority of the site area is within the Broads Authority it is not considered appropriate for allocation in this plan. The Broads Authority Plan contains policies relating to Whitlingham Country Park.	None

**PART 3 - ASSESSMENT OF NEW & REVISED SITES SUBMITTED
DURING THE REGULATION 18C CONSULTATION**

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

FINAL CONCLUSIONS FOR THE REGULATION 19 VERSION OF THE PLAN

Site assessments prior to the Regulation 18C consultation

Up to the Regulation 18C consultation there were thirteen sites promoted for commercial/employment use, six sites for recreation/leisure use, and one for community uses across the Urban Fringe. The outcome of initial site assessment work (which is detailed in part 1 of this booklet) was to prefer seven new sites, but this is not the entire story. There was also a total of ten carried forward allocations, several of which are integral to the vision and objectives of the GNLP, including existing allocations at the Norwich Research Park in Colney.

All the newly preferred sites are selected in order to update and revise existing allocations. For example, revisions are preferred to the Longwater retail park in Costessey, as well as the Royal Norfolk Showground. As to Hellesdon, there are revisions to open space designations; and, in Keswick the allocation KES2 is expanded to a corresponding planning permission.

A further part of the Regulation 18C consultation was a series of reasonable alternatives – concerning sites in Hellesdon, Sprowston, and Trowse. In Hellesdon, a single site had two alternatives, one proposal for residential versus a proposal for open space/leisure options. For Sprowston there were options for redeveloping the Park and Ride site; and, for a community hub adjacent to White House Farm. As to Trowse a new park and ride was proposed near the Bungay Road (B1332) and for enhanced facilities at Whitlingham Country Park.

Summary of comments from the Regulation 18C draft plan consultation

Through the Regulation 18C consultation relatively few comments were received regarding the non-residential sites across the Urban Fringe, but what was said has been taken into account. Comments were received about sites in Colney, Costessey, Keswick, Hellesdon, Sprowston, and Trowse.

For sites in Colney, comments came from Historic England about heritage assets for which adjustments have been considered for rewording and adding to policy requirements. As regards the nearby Colney Lakes, support was given for a new large-scale country park, but with caveats for managing the ecological benefits for what is a County Wildlife Site too.

The consultation response on Costessey related to sites COS3/GNLPSL2008 at the Longwater Employment Area, and COS5/GNLP2074 at the Royal Norfolk Showground. The only point about Longwater Employment Area came from Anglian Water about water efficiency which is being addressed by strategic policy 2. About the Royal Norfolk Showground, the agent on behalf of its owners gave support to the revisions proposed to COS5/GNLP2074.

In Keswick, comments concerned the land between the A140 and B1113, near Harford Bridge – sites KES 2, GNLP0497, and GNLP3047. Norfolk Wildlife Trust and

Historic England made points about the ecological implications to Harford Bridge Marshes and the heritage implications to the nearby All Saints Church. Other comments, including from Keswick and Intwood Parish Council and the site promoters, concerned the pace and trigger points for more commercial development in this location.

Comments were also received on some of the Hellesdon sites, these being HEL 4/GNLP1019, GNLP1021, and GNLP2142. Notably when responding about HEL 4/GNLP1019 development promoters on behalf of the landowner objected to the recreational open space as set on this site. For GNLP1021 support for the open space proposal came from Hellesdon Parish Council, as opposed to the competing residential proposal on the same land. Lastly in Hellesdon, promoters of GNLP2142 seeking to extend Hellesdon Park Industrial Estate expressed their opposition to the proposal being considered unreasonable.

For non-residential sites in Sprowston comments were made about GNLP0383 and GNLP3024. Sprowston Town Council said about GNLP0383 that if the park and ride is redeveloped it should be for civic use and not for housing. As to GNLP3024 the Town Council gave its support, the Environment Agency noted the need for a 20-metre buffer to nearby watercourses, and the promoter of the site observed how it is already a thriving hub of local businesses.

Regarding Trowse and parishes it is clustered with comments were made on GNLP3051 for a new park and ride facility, and GNLP3052 concerning Whittingham Country Park. About GNLP3051 there was a comment about how the plan-making process compared this site to the existing park and ride allocation (reference TROW2), and, another respondent living near to the site objected. As to GNLP3052, the Environment Agency noted any built development related to the country park should be on land classified as Flood Zone 1; and, the promoter points out that expanding the country park would benefit people living in the area, especially as the population increases.

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

No new or revised sites were submitted.

Sustainability Appraisal

The sustainability performance of each reasonable alternative site has been considered in the selection of sites. The Sustainability Appraisal includes a scoring and assessment narrative on the sustainability performance of each reasonable alternative and recommendations for mitigation measures have been incorporated in policy requirements as appropriate. The Sustainability Appraisal (which can be found in the evidence base [here](#)) highlighted a number of negative and positive impacts for non-residential sites across the Urban Fringe.

Final conclusion on sites for allocation in the Regulation 19 Plan

The approach taken in the Regulation 18C consultation was to prefer smaller additional sites that complemented existing allocations carried forward from existing plans. The same approach continues to be relevant and has been settled upon for the Regulation 19 GNLP. The list of new sites for allocation and carried forward sites for reallocation thus stays the same as at Regulation 18C.

New and carried forward reallocations are selected for Colney, Costessey, Keswick, and Hellesdon. GNLP0331RB, GNLP0331RC, COL 1, COL 2/GNLP0140-C, and COL 3 reaffirms and allows further modest expansion of the Colney Strategic Employment Area, which includes the Norwich Research Park. Added to that are updated and slightly expanded allocations for the Longwater Employment Area at Costessey, the Norfolk Showground site, and employment-related uses at Keswick.

As to open space allocations, the reallocation of Colney Lakes (BAW 2) represents commitment to further establishing a new country park here. On a smaller scale the reallocation of HEL3/GNLP1020 and HEL4/GNLP1019 reiterate existing commitments. HEL3/GNLP1020 being to extend the existing burial ground and HEL4/GNLP1019 being for recreational open space.

Conclusions have also been drawn as to sites considered reasonable alternatives at the Regulation 18C stage. The decision in all cases being not to make a new allocation, albeit for different reasons, which are explained in the table at appendix B. Sites not allocated are GNLP1021 in Hellesdon, GNLP0383 and GNLP3024 in Sprowston, as well as GNLP3051 and GNLP3052 in the Trowse cluster.

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