

Greater Norwich Local Plan Hearing Statement

Matter 10 – Housing and mixed Use allocations - new sites without planning permission that are allocated for less than 500 dwellings

Introduction

This Hearing Statement has been produced by Broadland District Council, Norwich City Council and South Norfolk Council, working with Norfolk County Council as the Greater Norwich Development Partnership (GNDP).

The Document Library for the Greater Norwich Local Plan (GNLP) Examination and further information can be found on the GNLP Examination website:

www.gnlp.org.uk

The Councils have responded to each question directly in the body of the Hearing Statement.

Site: Friars Quay Car Park, Colegate (Ref GNLP2163) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

1. The allocation of site GNLP2163 (see [A2](#), pages 62 to 64 for the policy) is justified as it is an appropriate housing development / residential-led mixed-use site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. This site allocation makes effective use of sustainably located brownfield land in the urban centre, see the site assessment booklet [B1.2](#).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

2. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Norwich site assessment booklet ([B1.2](#)). This process was robust and involved a number of different partners including Highways, Norwich City Council planning officers and development management colleagues, Minerals and Waste and the Lead Local Flood Authority. For site GNLP2163 the main constraints were identified as heritage impact, constraints related to developing brownfield land and the loss of car parking in the City Centre, which are proposed to be mitigated through requirements in the policy (see [A2](#), page 63).
3. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F71 to F74 and G4) identified mitigation measures to provide improvements to the site provided by the policy requirements.
4. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed?

Response to question 3

5. The availability of site GNLP2163 is confirmed through a Statement of Common Ground agreed with the promoter ([D2.18](#)).
6. The viability of site GNLP2163 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
7. The deliverability of site GNLP2163 is demonstrated in a number of different documents:
 - Housing Trajectory ([D3.2C](#)) which forecasts delivery of the 25 units in 2026/27.
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 48
 - Statement of Common Ground ([D2.18](#)) which advises a full planning application shall be submitted upon adoption of the GNLP. The owner /promoter expects to deliver all units within 24 months of starting on site.
 - Site Delivery Table ([D1.5](#))
8. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

9. As stated on page 48 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP2163 has been promoted, is assessed as suitable and has been shown by appraisal to be viable.
10. The owner/promoter Newall Properties Developments Ltd has provided an SoCG ([D2.18](#)) indicating their intention to bring forward the development through a planning application to tie in with anticipated completion of the local plan. Newall Properties Developments Ltd expect to deliver all units within 24 months of starting on site. GNLP2163 is consequently considered a 'developable' site under the NPPF definition, and this is reflected in the housing trajectory ([D3.2C](#)), with delivery of 25 homes in 2026/27 projected.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

11. The policy requirements for site GNLP2163 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP2163 this included producing additional Heritage related criteria in the policy relating to archaeology in response to concerns from Historic England at Regulation 18C, and subsequent support at Regulation 19.

Site: Land west of Eastgate House, Thorpe Road (Ref GNLP2164) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

12. The allocation of site GNLP2164 (see [A2](#), pages 65 to 67 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. This site allocation makes effective use of sustainably located brownfield land in the urban centre, see the site assessment booklet [B1.2](#).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

13. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Norwich site assessment booklet ([B1.2](#)). This process was robust and involved a number of different partners including Highways, Norwich City Council planning officers and development management colleagues, Minerals and Waste and the

Lead Local Flood Authority. For site GNLP2164 the main constraints were identified as townscape matters relating to heritage impact and areas of land with Tree Preservation Orders, which are proposed to be mitigated through requirements in the policy (see [A2](#), page 63).

14. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F75 to F78 and G4) identified mitigation measures provide improvements to the site provided by the policy requirements.
15. Consultation comments for this site did not raise any significant issues to be taken into account (see Statement of Consultation [A8.1](#) and associated appendices).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

16. The availability of site GNLP2164 is confirmed through a Statement of Common Ground agreed with the promoter ([D2.19](#)).
17. The viability of site GNLP2164 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
18. The deliverability of site GNLP2164 is demonstrated in a number of different documents:
 - Housing Trajectory ([D3.2C](#)) which forecasts delivery of the 20 units in 2026/27.
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 49
 - Statement of Common Ground ([D2.19](#)) which advises, following refusal of a previous application, the site owner remains committed to submitting a full planning application upon adoption of the GNLP. The owner /promoter expects to deliver all units within 24 months of starting on site.
 - Site Delivery Table ([D1.5](#))
19. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

20. As stated on page 49 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP2164 the landowner remains committed to the site and intends to submit another planning application when the site is allocated in the local plan. Also, the SoCG says that the development will be delivered within 24 months of starting on site.
21. Lanpro on behalf of Bignold House Ltd has provided an SoCG ([D2.19](#)) indicating their intention to bring forward the development through a planning application to tie in with anticipated completion of the local plan. The site owners have previously received resolution to approve an outline scheme for 20 flats on the site, which was ultimately refused due to Section 106 agreements not being reached. The site owner anticipates being able to offer/deliver a full suite of CIL/S.106 contributions in line with the City Council's normal adopted and emerging standards and expect to deliver all units within 24 months of starting on site. GNLP2164 is consequently considered a 'developable' site under the NPPF definition, and this is reflected in the housing trajectory ([D3.2C](#)), with delivery of 20 homes in 2026/27 projected.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

22. The policy requirements for site GNLP2164 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have not required amendment in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices). The site has been generally well accepted.

Site: Land to the west of Green Lane West, Rackheath (Ref GNLP0172) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

23. The allocation of site GNLP0172 (see [A2](#), pages 228-229) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as one of the most suitable and deliverable sites in the Rackheath, see the site assessment booklet [B1.9](#) .

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

24. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Rackheath Site Assessment booklet [B1.9](#) . This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For Site GNLP0172 the main constraints were identified as the proximity to the grade II listed Rackheath Hall and bridge to the west of the A1270 as well as site being underlain by safeguarded mineral resources, which are both proposed to be mitigated through requirements in the policy (see [A2](#), pages 228-229)
25. The Sustainability Appraisal (see [A6.3](#) [B1.53](#), for detailed assessments of the site, particularly F298-302 and G7) also identified possible mitigation measures in relation to the landscape buffer for the Broadland Northway and proximity to the historic gardens of Rackheath Hall, a grade II listed building.
26. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and [A8.20](#) and associated appendices page 51-52). In the case of GNLP0172 a statement of common ground has been produced with Historic England ([B4.3](#) page 57) and HE has welcomed the criterion 6 to make it absolutely clear that land to the

west of the A1270 should only be used for open space and to conserve and where opportunities arise enhance the grade II listed Rackheath Hall and bridge.

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

27. The availability of site GNLP0172 is confirmed through a Statement of Common Ground/ Delivery Statement agreed with the promoter [D2.71](#) .
28. The viability of site GNLP0172 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
29. The deliverability of site GNLP0172 is demonstrated in a number of different documents:
 - Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 28
 - Statement of Common Ground/ Delivery Statement [D2.71](#) .
 - (Site Delivery Table ([D1.5](#)) page 4 of 11
30. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

31. As stated on page 28 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0172 has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
32. The developer Taylor Wimpey has provided an SoCG ([D2.71](#)) indicating their intention to bring forward the development through a planning application 20172208 to tie in with anticipated completion of the local plan. Taylor Wimpey expect

construction to begin in 2023 at the rate of 50 homes per annum and complete the scheme by 2025/26. GNLP0172 is consequently considered a ‘deliverable’ site under the NPPF definition, and this is reflected in the housing trajectory ([D3.2C](#)), with delivery of 205 homes expected 2025/26 projected.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

33. The policy requirements for site GNLP0172 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and [A8.20](#) associated appendices) as well as in the Rackheath Site Assessment booklet [B1.9](#). In the case of GNLP0172 this included that criterion 6 required that land to the west of the A1270 should only be used for open space and to conserve and where opportunities arise enhance the grade II listed Rackheath Hall and bridge in response to concerns from Historic England. In addition, criterion 7 requires the considering the benefits of extracting the minerals as site partly underlain by safeguarded mineral resources in response from comments from Minerals and Waste team.

Site: Land at Heathwood Gospel Hall, Green Lane West, Rackheath (Ref GNLP0351) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

34. The allocation of site GNLP0351 (see [A2](#), pages 230-231 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and [A8.20](#) and associated appendices) and the settlement hierarchy. It has been assessed as one of the most suitable and deliverable site in the Rackheath Site Assessment Booklet [B1.9](#)

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

35. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Rackheath Site Assessment Booklet [B1.9](#). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0351 the main constraints were identified as the need to manage the compatibility of neighbouring industrial estate uses and in the event of expanding the site over 1 ha then Mineral and Waste Plan Policy CS16 would apply as site is underlain by sand and gravel within the minerals and waste consultation area. These are both proposed to be mitigated through requirements in the policy (see [A2](#), pages 230-231).
36. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F304 to 306 and G8) also identified possible mitigation measures in relation to industrial buildings to the rear of the site which were included in the policy.
37. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and [A8.20](#) and associated appendices).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

38. The availability of site GNLP0351 is confirmed through a Statement of Common Ground / Delivery Statement agreed with the promoter ([D2.72](#)).
39. The viability of site GNLP0351 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
40. The deliverability of site GNLP0351 is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 29-30
 - Statement of Common Ground/Delivery Statement ([D2.72](#))
 - Site Delivery Table ([D1.5](#))

41. As stated on page 29 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

42. As stated on page 29 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0351 has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
43. Lanpro on behalf of the promoter has provided an SoCG ([D2.72](#)) indicating their intention to bring forward the development through a planning application in 2022 to tie in with anticipated completion of the local plan. Lanpro expect construction to begin in 2022-2023 and complete the scheme by 2026/27. GNLP0351 is consequently considered a 'deliverable' site under the NPPF definition, and this is reflected in the housing trajectory ([D3.2C](#)), with delivery of 15 homes in 2026/27 projected.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

44. The policy requirements for site GNLP0351 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and [A8.20](#) associated appendices as well as, the Rackheath Site Assessment Booklet [B1.9](#)). In the case of GNLP0351 this included reference to Minerals and Waste policy CS16 in the event the site was expanded over 1 ha in response to comments made by Minerals and Waste Team. In addition, measures to manage compatibility with neighbouring industrial uses were also included per comments made by Development Management colleagues.

Site: Land off Beech Avenue, Taverham (Ref GNLP0159R) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

45. The allocation of site GNLP0159R (see [A2](#), pages 245-246 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and [A8.20](#) associated appendices) and the settlement hierarchy. It has been assessed as one of the most suitable and deliverable site in the Taverham Site Assessment Booklet ([B1.11](#))

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

46. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Taverham Site Assessment Booklet ([B1.11](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0159R the main constraints were identified as heritage impact and the need for potential highway improvements, which are both proposed to be mitigated through requirements in the policy (see [A2](#), page 245-246).
47. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F313 to 316 and G8) confirmed that no major constraints were foreseen apart from a small deciduous woodland on part of the site, as result the site policy requires mitigation for impact on trees established through an arboricultural impact assessment.
48. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and [A8.20](#) associated appendices as well as Taverham Site Assessment Booklet ([B1.11](#))) In the case of GNLP0159R the access point was subject to access

via site adjacent under same ownership and reference to Minerals and waste policy CS16 as site underlain by Minerals safeguarding area for sand and gravel.

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

49. The availability of site GNLP0159R is confirmed through a Statement of Common Ground/Delivery Statement agreed with the promoter ([D2.75](#)).
50. The viability of site GNLP0159R has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
51. The deliverability of site GNLP0159R is demonstrated in a number of different documents:
 - Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 31
 - Statement of Common Ground / Delivery Statement ([D2.75](#))
 - Site Delivery Table ([D1.5](#))
52. As stated on page 31 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

53. As stated on page 31 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0159R has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
54. The developer Abel Homes has provided a SoCG ([D2.75](#)) indicating their intention to bring forward the development through a planning application in 2022/23 to tie in with

anticipated completion of the local plan. Abel Homes expect construction to begin and complete the scheme by 2022/23. GNLP0159R is consequently considered a 'deliverable' site under the NPPF definition, and this is reflected in the housing trajectory ([D3.2C](#)), with delivery of 12 homes in 2022/23 projected.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

55. The policy requirements for site GNLP0159R are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Taverham Site Assessment Booklet ([B1.11](#) and Statement of Consultation [A8.1](#) and [A8.20](#) associated appendices). In the case of site GNLP0159R, this was kept to twelve homes due to deciduous woodland on site as well as access via site to the east in response to comments from highway authority.

Site: Colney Hall, Watton Road, Colney (Ref GNLP0253) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

56. The allocation of site GNLP0253 (see [A2](#), pages 184-85 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and [A8.20](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site in the Colney site assessment booklet ([B1.3](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0253 the main constraints were identified as heritage impact and the need for potential highway improvements, which are both proposed to be mitigated through requirements in the policy (see [A2](#), pages 184-185). (see Heritage Statement ([B10.4](#)) completed at the request of Historic England).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

57. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Colney site assessment booklet ([B1.3](#)).
58. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F232 to 236 and G6) also identified possible mitigation measures in relation to heritage impact which were included in the policy.
59. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and [A8.20](#) and associated appendices). In the case of site GNLP0253 a Heritage Statement ([B10.4](#)) has been produced in response to concerns raised by Historic England. In addition, a statement of common ground has been produced with Historic England ([B4.3](#) page 53) where the GNLP has not objection to the proposed modification if the inspector is minded to recommend it.

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

60. The availability of site GNLP0253 is confirmed through a Statement of Common Ground / Delivery Statement agreed with the promoter ([D2.58](#)).
61. The viability of site GNLP0253 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
62. The deliverability of site GNLP0253 is demonstrated in a number of different documents:
 - Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 51
 - Statement of Common Ground / Delivery Statement ([D2.58](#)).
 - Site Delivery Table ([D1.5](#))

63. As stated on page 51 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

64. As stated on page 51 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0253 has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
65. The landowner of the Colney Estate has signed an SoCG ([D2.58](#)) indicating the commitment to bring forward an exemplary scheme for specialist housing for older people and for university research and healthcare uses to support wellbeing in later life. Pre-application discussions have already happened, and various consultation activities are planned. The landowner has set a timetable for submitting a planning application in early 2022 and completing the scheme in 2025/26. GNLP0253 is consequently considered a 'deliverable' site under the NPPF definition, and this is reflected in the housing trajectory ([D3.2C](#)), a cautious approach has been taken in the housing trajectory, projecting delivery from 2026/27 to allow ample time to progress to a planning consent.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

66. The policy requirements for site GNLP0253 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP0253 this included producing a Heritage Statement ([B10.4](#)) has been produced in response to concerns raised by Historic England. In addition, a statement of common ground has been produced with

Historic England ([B4.3](#) page 53) where the GNLP has no objection to the proposed modification if the inspector is minded to recommend it.

Site: Land at Briar Farm, Harleston (Ref GNLP2136) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

67. The allocation of site GNLP2136 (see [A2](#), pages 280 and 282) is justified as it is an appropriate housing development site, taking account of reasonable alternatives and is supported by evidence. Its inclusion as an allocation has taken account of the sustainability appraisal (see [A6.3](#), section F.16.2), consultation comments (see Statement of Consultation [A8.1](#), and [A8.14](#)), and the settlement hierarchy. It has been assessed as amongst the most suitable and deliverable sites in Harleston (see site assessment booklet [B1.16](#)).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

68. The constraints to development and any implications for infrastructure have been identified and evaluated through the Harleston site assessment booklet ([B1.16](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP2136 the main constraints were identified as effectively masterplanning this mixed-use scheme, achieving two suitable access points, and safeguarding an existing Public Right of Way, which will be mitigated through requirements in the policy (see [A2](#), pages 280 and 282).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

69. The availability of site GNLP2136 is confirmed through a Statement of Common Ground agreed with the promoter M Scott Properties Ltd ([D2.83](#)). As stated on page 54 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of GNLP2136 has been considered with regard to the Statement of Common Ground, pre-application

discussions, and other objective evidence including the Lichfields publication '[Start to Finish](#)'

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

70. As stated on page 54 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP2136 has been promoted, is assessed as suitable, and is appraised to be viable. Consequently, GNLP2136 is considered deliverable under the NPPF definition, and this is reflected in the housing trajectory ([D3.2C](#)), with delivery of 75 homes in 2023/24.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

71. The promotor Scott Properties is undertaking work to deliver the policy requirements. Also, in their Statement of Common Ground ([D2.83](#)) Scott Properties confirms their commitment to the community benefits of the allocation. These are amongst other things 8 ha of open space, 0.65 ha of allotments, and 1.6 ha for community use. Notably too the policy requirements were consulted upon at the Regulation 18C stage and were evolved as a consequence.

Site: Land at Norwich Road, Aylsham (Ref GNLP0596R) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

72. The allocation of site GNLP0596R (see [A2](#), pages 262 and 264) is justified as it is an appropriate housing development site, taking account of reasonable alternatives and is supported by evidence. Its inclusion as an allocation has taken account of the sustainability appraisal (see [A6.3](#), section F.13.4), consultation comments (see Statement of Consultation [A8.1](#), and [A8.14](#)), and the settlement hierarchy.
73. GNLP0596R has been assessed as amongst the most suitable and deliverable sites in Aylsham (see site assessment booklet [B1.14](#)) and was moved from a “reasonable

alternative” to an allocation during 2020. A decision that was related to an uplift in the strategic housing requirement.

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

74. The constraints to development and any implications for infrastructure have been identified and evaluated through the Aylsham site assessment booklet ([B1.14](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority.
75. For site GNLP0596R the main constraints were identified in a masterplan to incorporate a 90 bed care unit, achieving two suitable access points along Norwich Road, safeguarding an existing Public Right of Way, and managing drainage. Conserving the setting of the Grade II Diggens Farmhouse was considered in a Heritage Statement ([B10.9](#)) that was produced in response to concerns raised by Historic England.

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

76. The availability of site GNLP0596R is confirmed through a Statement of Common Ground agreed with the promoter Norfolk Homes Ltd ([D2.78](#)). As stated on page 32 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of GNLP0596R has been considered with regard to the Statement of Common Ground, pre-application discussions, and other objective evidence including the Lichfields publication '[Start to Finish](#)'

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

77. As stated on page 32 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0596R has been promoted, is assessed as suitable, and is appraised to be viable. Consequently, GNLP0596R is considered deliverable under the NPPF definition. This is reflected in the housing trajectory ([D3.2C](#)), with delivery beginning in 2024/25 with 25 homes, and the scheme completing in 2033/34.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

78. Norfolk Homes are undertaking work to deliver the policy requirements. In their Statement of Common Ground ([D2.78](#)), they confirm their commitment to the community benefits of the allocation, which are a care facility, policy-compliant affordable housing, public open space, and land for a sustainable transport hub (as identified by the Town Council). The extra care housing facility is considered justified in order to respond to the housing needs of older people ([D3.7](#), Appendix A) and the idea for a sustainable transport hub responds to the priorities in the Aylsham Neighbourhood Plan, under objective 7.

Site: Land south of Burgh Road and west of the A140, Aylsham (RefGNLP0311, 0595 and 2060) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

79. The allocation of site GNLP0311, 0595 and 2060 (see [A2](#), pages 259 and 261) is justified as it is an appropriate housing development site, taking account of reasonable alternatives and is supported by evidence. Its inclusion as an allocation has taken account of the sustainability appraisal (see [A6.3](#), section F.13.3), consultation comments (see Statement of Consultation [A8.1](#), and [A8.14](#)), and the settlement hierarchy. GNLP0311, 0595 and 2060 has been assessed as amongst the most suitable and deliverable sites in Aylsham (see site assessment booklet [B1.14](#)).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

80. The constraints to development and any implications for infrastructure have been identified and evaluated through the Aylsham site assessment booklet ([B1.14](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues,

Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0311, 0595 and 2060 the main constraints were identified as a masterplan to incorporate land for a primary school, achieving two suitable access points along Burgh Road, improved green infrastructure alongside the Bure Valley Walk, conserving the setting of the Grade II Bure Valley Farmhouse, and managing drainage.

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

81. The availability of site GNLP0311, 0595 and 2060 is confirmed through a Statement of Common Ground agreed with the promoter Hopkins Homes Ltd ([D2.77](#)). As stated on page 32 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of GNLP0311, 0595 and 2060 has been considered with regard to the Statement of Common Ground, pre-application discussions, comparable recent schemes in Aylsham, and other objective evidence including the Lichfields publication '[Start to Finish](#)'

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

82. As stated on page 32 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0311, 0595 and 2060 has been promoted, is assessed as suitable, and is appraised to be viable. Consequently, GNLP0311, 0595 and 2060 is considered deliverable under the NPPF definition. This is reflected in the housing trajectory ([D3.2C](#)), with delivery beginning in 2024/25 with 50 homes, and the scheme completing in 2028/29.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

83. The promoter Hopkins Homes is undertaking work to deliver the policy requirements. In their Statement of Common Ground ([D2.77](#)), Hopkins Homes confirms their commitment to the community benefits of the allocation, which are land for a primary school, affordable housing, public open space, and a formal crossing of the A140 where the Bure Valley Path crosses the A140. Notably, the need for the primary school requirement was identified by the Local Education Authority, was consulted upon at the Regulation 18C stage, and Hopkins Homes have committed to delivering this requirement.

Site: Land at Frontier Agriculture Ltd, Sandy Lane, Diss (Ref GNLP0102) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

84. The allocation of site GNLP0102 (see [A2](#), pages 273 and 274) is justified as it is an appropriate housing development site, taking account of reasonable alternatives and is supported by evidence. Its inclusion as an allocation has taken account of the sustainability appraisal (see [A6.3](#), section F.14.1), consultation comments (see Statement of Consultation [A8.1](#), and [A8.14](#)), and the settlement hierarchy. GNLP0102 has been assessed as amongst the most suitable and deliverable sites in Diss (see site assessment booklet ([B1.15](#))).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

85. The constraints to development and any implications for infrastructure have been identified and evaluated through the Diss site assessment booklet ([B1.15](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0102 the main constraints were identified as assessment of possible site contamination, mitigation of neighbouring uses, cycle/footway improvements, and mitigating risk of surface water flood risk.

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

86. The availability of site GNLP0102 is confirmed through a Statement of Common Ground agreed with the promoter and landowner Frontier Agriculture Ltd ([D2.81](#)). As stated on page 52 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of GNLP0102 has been considered with regard to the Statement of Common Ground, and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

87. As stated on page 52 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0102 has been promoted, is assessed as suitable, and is appraised to be viable. Consequently, GNLP0102 is considered developable under the NPPF definition. This is reflected in the housing trajectory ([D3.2C](#)), with delivery beginning in 2025/26 with 75 homes, and the scheme completing in 2026/27.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

88. The promotor Frontier Agriculture is undertaking work to deliver the policy requirements, which relate primarily to redeveloping a brownfield site and providing pedestrian/footway improvements. In their Statement of Common Ground ([D2.81](#)), Frontier Agriculture confirms their commitment to dealing with the technical challenges of the site which are to do with ground conditions, landscaping/ecology, highways/access, and noise impacts from the nearby railway. These issues have been subject to public consultation at Regulation 18C stage and discussions have taken place with the promoter to ensure that the policy requirements can be met.

Site: Land South of Spirketts Lane, Harleston (Ref GNLP2108) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

89. The allocation of site GNLP2108 (see [A2](#), pages 278 and 279) is justified as it is an appropriate housing development site, taking account of reasonable alternatives and is supported by evidence. Its inclusion as an allocation has taken account of the sustainability appraisal (see [A6.3](#), section F.16.1), consultation comments (see Statement of Consultation [A8.1](#), and [A8.14](#)), and the settlement hierarchy. GNLP2108 has been assessed as amongst the most suitable and deliverable sites in Harleston (see site assessment booklet [B1.16](#)).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

90. The constraints to development and any implications for infrastructure have been identified and evaluated through the Harleston site assessment booklet ([B1.16](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP2108 the main constraints were identified as points of access from Spirkett's Lane, safeguarding a Public Right of Way to the River Waveney, and a design layout to take account of existing adjacent development.

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

91. The availability of site GNLP2108 is confirmed through a Statement of Common Ground agreed with the promoter Durrants ([D2.82](#)). As stated on page 53 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of GNLP2108 has been considered with regard to the Statement of Common Ground, and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

92. As stated on page 53 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP2108 has been promoted, is assessed as suitable, and is appraised to be viable. Consequently, GNLP2108 is considered developable under the NPPF definition. The site may need until 2026/27 before house-building commences. But equally, the agent's predicted start on site is 2023/24.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

93. The promotor Durrants is undertaking work to deliver the policy requirements, and acknowledges the principal constraints of the footpath, surface water flood risk, and the need for landscaping next to the Harleston bypass. In their Statement of Common Ground ([D2.82](#)), Durrants also confirm their commitment to affordable housing, open space, and retaining the Public Right of Way to the River Waveney. All these issues were also subject to public consultation at Regulation 18C stage.

Site: Land at Johnson's Farm, Wymondham (Ref GNLP0354R) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

94. The allocation of site GNLP0354R (see [A2](#), pages 307 and 308) is justified as it is an appropriate housing development site, taking account of reasonable alternatives and is supported by evidence. Its inclusion as an allocation has taken account of the sustainability appraisal (see [A6.3](#), section F.17.1), consultation comments (see Statement of Consultation [A8.1](#), and [A8.14](#)), and the settlement hierarchy. GNLP0354R has been assessed as amongst the most suitable and deliverable sites in Wymondham (see site assessment booklet [B1.18](#)).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

95. The constraints to development and any implications for infrastructure have been identified and evaluated through the Wymondham site assessment booklet ([B1.18](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0354R the main constraints were the access from London Road, pedestrian/cycle access via Preston Avenue, and mitigating impact on the Conservation Area and listed buildings to the north of the site.

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

96. The availability of site GNLP0354R is confirmed through a Statement of Common Ground agreed with the landowner ([D2.90](#)). As stated on page 53 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of GNLP0354R has been considered with regard to the Statement of Common Ground, and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

97. As stated on pages 54-55 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0354R has been promoted, is assessed as suitable, and is appraised to be viable. Consequently, GNLP0354R is considered developable under the NPPF definition, and will likely commence by 2026/27. But equally, the agent's predicted start on site is in four years, which would be 2025/26.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

98. The promotor Cheffins is undertaking work to deliver the policy requirements, which includes assessments of heritage, highways and drainage matters, and a concept master plan has been drafted. This gives confidence that the policy requirements are justified; and furthermore, they were consulted upon and evolved following the public consultation at Regulation 18C stage.

Site: Land North of Tuttle Lane, Wymondham (Ref GNLP3013) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

99. The allocation of site GNLP3013 (see [A2](#), pages 307 and 308) is justified as it is an appropriate housing development site, taking account of reasonable alternatives and is supported by evidence. Its inclusion as an allocation has taken account of the

sustainability appraisal (see [A6.3](#), section F.17.2), consultation comments (see Statement of Consultation [A8.1](#), and [A8.14](#)), and the settlement hierarchy. GNLP3013 has been assessed as amongst the most suitable and deliverable sites in Wymondham (see site assessment booklet [B1.18](#)).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

100. The constraints to development and any implications for infrastructure have been identified and evaluated through the Wymondham site assessment booklet ([B1.18](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP3013 the main constraints were the access from Tuttle Lane, the amenity of the neighbouring dwelling, and mitigating surface water flood risk.

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

101. The availability of site GNLP3013 is confirmed through a Statement of Common Ground agreed with the landowner ([D2.91](#)). As stated on page 53 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of GNLP3013 has been considered with regard to the Statement of Common Ground, and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

102. As stated on pages 54-55 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP3013 has been promoted, is assessed as suitable, and is appraised to be viable. Consequently, GNLP3013 is considered developable under the NPPF definition. The landowner predicts the development could commence in 2026, but to be cautious the site is placed towards the back of the trajectory to deliver in 2028/29.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

103. The primary challenges of site GNLP3013 relate to achieving a suitable, consideration of surface water flood risk, and landscaping. These issues and the requirements to deal with them were also consulted upon at Regulation 18C stage. Furthermore, the Statement of Common Ground from the landowner ([D2.91](#)) acknowledges that the allocation will offer affordable housing, green infrastructure, and biodiversity enhancements.

Site: Land west of Acle (north of Norwich Road, south of South Walsham Road) (Ref GNLP0378R and GNLP2139R) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

104. The allocation of site GNLP0378R and GNLP2139R (see [A2](#), pages 313 and 314 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site in the Acle, see the site assessment booklet ([B1.19](#))

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

105. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Acle site assessment booklet ([B1.19](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For sites GNLP0378R and GNLP2139R the main constraints were identified as gaining access via ACL 1 and the need for potential highway improvements, which are both proposed to be mitigated through requirements in the policy (see [A2](#), pages 313 and 314).

106. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F409 to 412) also identified possible mitigation measures in relation to access and highway improvements were included in the policy.

107. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

108. The availability of sites GNLP0378R and GNLP2139R is confirmed through a Statement of Common Ground agreed with the promoter ([D2.92](#) and [D2.93](#)).

109. The viability of site GNLP0378R and GNLP2139R has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).

110. The deliverability of sites GNLP0378R and GNLP2139R is demonstrated in a number of different documents:

- Housing Trajectory ([D3.2C](#))
- Appendix 4 to Topic Paper 1 ([D3.2](#)) page 3
- Statement of Common Ground ([D2.92](#) and [D2.93](#))
- Site Delivery Table ([D1.5](#))

111. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

112. As stated on page 33 of Appendix 4 to Topic Paper 1 ([D3.2](#)), sites GNLP0378R and GNLP2139R have been promoted, are assessed as suitable and have been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.

113. The developer Lovell has provided an SoCG ([D2.92](#) and [D2.93](#)) indicating their expectation to begin construction in 2023 to tie in with anticipated completion of the local plan. Lovells expect the scheme to begin in 2023 and complete by 2034. GNLP0378R and GNLP2139R is consequently considered a 'deliverable' site under the NPPF definition, and this is reflected in the housing trajectory ([D3.2C](#)), with delivery of 45 homes per annum in 2024/25 through to 2032/33 and 25 homes in 2033/34 projected.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

114. The policy requirements for site GNLP0378R and GNLP2139R are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices).

Site: Land to the east of Beccles Road, Loddon (Ref GNLP0312) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

115. The allocation of site GNLP0312 (see [A2](#), pages 345 and 346 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as one of the most suitable and deliverable sites in the Loddon cluster, see the site assessment booklet ([B1.42](#))

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

116. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Loddon and Chedgrave site assessment booklet ([B1.42](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0312 the main constraints were identified with the access and the need for potential highway improvements, which are both proposed to be mitigated through requirements in the policy (see [A2](#), pages 434 and 435).
117. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F454 to 456 and G11) also identified possible mitigation measures in relation to heritage impact which were included in the policy .
118. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

119. The availability of site GNLP0312 is confirmed through a Statement of Common Ground agreed with the promoter ([D2.108](#)). An additional update has been provided by the developer to confirm that a planning application was submitted on 22nd October 2021.
120. The viability of site GNLP0312 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
121. The deliverability of site GNLP0312 is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 57 and 58
 - Statement of Common Ground ([D2.108](#)) UPDATED**
 - Site Delivery Table ([D1.5](#))

122. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

123. As stated on pages page 57 and 58 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0312 has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
124. The developer Hopkins Homes has provided an SoCG ([D2.108](#)) confirming that a planning application was intended to be submitted in the second quarter of 2021. An additional update has since been provided by the developer to confirm that a planning application was submitted on 22nd October 2021, to tie in with anticipated completion of the local plan. Hopkins Homes expect construction to begin in 2023 and complete the scheme by 2026/27. GNLP0312 is consequently considered a 'deliverable' site under the NPPF definition, and this is reflected in the housing trajectory ([D3.2C](#)), with an annual delivery of 50 homes in 2023/24 through to 2025/26 and 30 homes in 2026/27 projected.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

125. The policy requirements for site GNLP0312 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices).

Site: Land south of Norwich Road, Hingham (Ref GNLP0520) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

126. The allocation of site GNLP0520 (see [A2](#), pages 348 and 349 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site in the Hingham cluster, see the site assessment booklet ([B1.23](#))

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

127. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Hingham site assessment booklet ([B1.23](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0520 the main constraints were identified as heritage impact and the sites susceptibility to surface water flooding, which are both proposed to be mitigated through requirements in the policy (see [A2](#), page 348 and 349).

128. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F446 to 448) also identified possible mitigation measures in relation to heritage impact which were included in the policy.

129. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP0520 a Flood Risk Assessment and Drainage Strategy ([D2.105.1](#)) has been produced in response to the Lead Local Flood Authority (LLFA).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

130. The availability of site GNLP0520 is confirmed through a Statement of Common Ground agreed with the promoter ([D2.105](#)).
131. The viability of site GNLP0520 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
132. The deliverability of site GNLP0520 is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 56 and 57
 - Statement of Common Ground ([D2.105](#))
 - Site Delivery Table ([D1.5](#))
133. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

134. As stated on page 56 and 57 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0520 has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
135. The developer Abel Homes has provided an SoCG ([D2.105](#)) indicating their intention to bring forward the development through a planning application in 2022 to tie in with anticipated completion of the local plan. Abel Homes expect construction to begin in 2024 and complete the scheme by 2027. GNLP0520 is consequently considered a 'deliverable' site under the NPPF definition, and this is reflected in the housing trajectory ([D3.2C](#)), with delivery of 35 homes in 2023/24 and 2024/25 and 10 homes in 2025/26 projected.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

136. The policy requirements for site GNLP0520 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP0520 a Flood Risk Assessment and Drainage Strategy ([D2.105.1](#)) has been produced in response to the Lead Local Flood Authority (LLFA).

Site: Land off Langley Road, Chedgrave (Ref GNLP0463R) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

137. The allocation of site GNLP0463R (see [A2](#), pages 356 and 357 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as one of the most suitable and deliverable sites in the Loddon and Chedgrave cluster, see the site assessment booklet ([B1.24](#)).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

138. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Loddon and Chedgrave site assessment booklet ([B1.24](#)). This process was robust and involved a number of different partners including Norfolk County Council

highways, district council development management colleagues, planning officers from Norwich City Council, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0463R the main constraints were identified as heritage/landscape impact and the site's susceptibility to surface water flooding, which are both proposed to be mitigated through requirements in the policy (see [A2](#), pages 356 and 357).

139. The Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F458 to 460 and G11) also identified possible mitigation measures in relation to heritage impact and surface water flooding, which were included in the policy.
140. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

141. The availability of site GNLP0463R is confirmed through a Statement of Common Ground agreed with the promoter ([D2.110](#)).
142. The viability of site GNLP0463R has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
143. The deliverability of site GNLP0463R is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 57
 - Statement of Common Ground ([D2.110](#))
 - Site Delivery Table ([D1.5](#))
144. As stated on page 57 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

145. As stated on page 57 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0463R has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
146. The developer ESCO Developments has provided an SoCG ([D2.110](#)) indicating their intention to bring forward the development through a planning application in 2022 to tie in with anticipated completion of the local plan. ESCO Developments expect construction to begin in 2023 and complete the scheme by 2025. GNLP0463R is consequently considered a 'deliverable' site under the NPPF definition, and this is reflected in the housing trajectory ([D3.2C](#)), with delivery of 30 homes in 2023/24 and 30 homes in 2024/25 projected.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

147. The policy requirements for site GNLP0463R are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices).

Site: Land adjacent to Norwich Camping & Leisure, off Yarmouth Road, Blofield (Ref GNLP2161) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

148. The allocation of site GNLP2161 (see [A2](#), pages 323 and 324 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the

site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site in Blofield cluster, see the site assessment booklet ([B1.20](#))

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

149. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Blofield site assessment booklet ([B1.20](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP2161 the main constraint identified is for potential highway works/improvements, which is proposed to be mitigated through requirements in the policy (see [A2](#), pages 323 and 324).
150. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

151. The availability of site GNLP2161 is confirmed through a Statement of Common Ground agreed with the promoter ([D2.97](#))
152. The viability of site GNLP2161 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 34
 - Statement of Common Ground ([D2.97](#))
 - Site Delivery Table ([D1.5](#))
153. The deliverability of site GNLP02161 is demonstrated in a number of different documents: As stated on page 34 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground

agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

154. As stated on page 34 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP2161 has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
155. The developer Tredwell Developments Ltd has provided an SoCG ([D2.97](#)) indicating their intention to bring forward the development through a planning application in 2021/22 to tie in with anticipated completion of the local plan. Tredwell Developments Ltd expect construction to begin in 2023 and complete the scheme by 2026/27. GNLP2161 is consequently considered a 'deliverable' site under the NPPF definition, and this is reflected in the housing trajectory ([D3.2C](#)), with delivery of the 15 homes in 2026/27 projected.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

156. The policy requirements for site GNLP2161 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices).

Site: Land north of Springfield Way and west of Dereham Road, Hingham (Ref GNLP0503) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

157. Since the publication of the GNLP Regulation 19 Pre-Submission Draft the landowners have changed their minds about wanting to sell their land for development. This site is consequently not expected to come forward. This is not strategically significant as GNLP0503 is a relatively small 20-home site, and so does not undermine either the overall housing numbers in the plan or the approach taken to development in Key Service Centres, such as Hingham.

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

158. GNLP0503 has been withdrawn.

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

159. GNLP0503 has been withdrawn.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

160. GNLP0503 has been withdrawn.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

161. GNLP0503 has been withdrawn.

Site: Land to the west of West Lane, Horsham St Faith (Ref GNLP0125R) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

162. The allocation of site GNLP0125R (see [A2](#), pages 434 and 435 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site in the Horsham St Faith/Newton St Faith cluster, see the site assessment booklet [B1.40](#). The site boundary was increased to accommodate 50 dwellings following representation submitted by the site promoter at Regulation 18C (see page 167 of appendix 9f of Statement of Consultation ([A8.16](#))).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

163. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Horsham St Faith site assessment booklet ([B1.40](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0125R the main constraints were identified as heritage impact and the need for potential highway improvements, which are both proposed to be mitigated through requirements in the policy (see [A2](#), pages 434 and 435).

164. The site was also subject to Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F540 to 543 and G14). Issues flagged up for site GNLP0125 through the SA were related to historic environment impacts but it was considered that these can be addressed through policy.
165. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP0125R a Heritage Statement ([B10.1](#)) has been produced in response to concerns raised by Historic England as well as the addition of a further policy requirement to conserve and enhance the significance of listed buildings in the vicinity of the site (see page 164 of appendix 9f of Statement of Consultation ([A8.16](#))).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

166. The availability of site GNLP0125R is confirmed through a Statement of Common Ground agreed with the promoter ([D2.129](#)).
167. The viability of site GNLP0125R has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
168. The deliverability of site GNLP0125R is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 38
 - Statement of Common Ground ([D2.129](#))
 - Site Delivery Table ([D1.5](#))
169. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

170. As stated on page 38 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0125R has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
171. The developer Abel Homes has provided an SoCG ([D2.129](#)) indicating their intention to bring forward the development through a planning application in 2022 to tie in with anticipated completion of the local plan. Abel Homes expect construction to begin in 2024 and complete the scheme by 2025/26. GNLP0125R is consequently considered a 'deliverable' site under the NPPF definition, and this is reflected in the housing trajectory ([D3.2C](#)), with delivery of 25 homes in 2024/25 and 25 homes in 2025/26 projected.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

172. The policy requirements for site GNLP0125R are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices. In the case of site GNLP0125R a Heritage Statement ([B10.1](#)) has been produced in response to concerns raised by Historic England as well as the addition of a further policy requirement to conserve and enhance the significance of listed buildings in the vicinity of the site (see page 164 of appendix 9f of Statement of Consultation ([A8.16](#))). At Regulation 19 the site promoter suggested a change to policy requirement number 1 in relation to highway requirements, as stated at page 111 of appendix 11b to the Statement of Consultation ([A8.20](#)) the GNLP authorities have no objection in principle to this

Site: Dog Lane, Horsford (Ref GNLP0264) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

173. The allocation of site GNLP0264 (see [A2](#), pages 430 and 431 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site in the Horsford cluster, see the site assessment booklet [B1.39](#).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

174. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Horsford site assessment booklet [B1.39](#). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0264 the main constraints was access from Dog Lane, the site was only considered suitable for allocation if accessed via Horsebeck Way and this is proposed to be mitigated through a requirement in the policy (see [A2](#), pages 430 and 431).

175. The site has been subject to Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F536 to 539 and G14) GNLP0264 did score negatively in the SA for health, education and economy but was still considered favourably for allocation as the loss of economic uses on the site needs to be weighed up against the benefits of developing a brownfield site for housing over greenfield land.

176. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP0264 a policy requirement was added relating to a WFD compliance assessment in relation to representations received from the Environment Agency at Regulation 18C (see page 124 of appendix 9f of the Statement of Consultation ([8.16](#))).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

177. With regards to availability to date no Statement of Common Ground has been agreed for the site but it still has good prospects for development in the plan period, and discussions continue with the agent about submitting an SoCG. To be cautious, the site has been included in the housing trajectory ([D3.2C](#)) towards the end of the plan period to start in 2029/30.
178. The viability of site GNLP0264 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
179. The deliverability of site GNLP0264 is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 38
 - Site Delivery Table ([D1.5](#))
180. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

181. As stated on page 38 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0264 has been promoted, is assessed as suitable and has been shown by appraisal to be viable.
182. To date no Statement of Common Ground has been agreed for the site but it still has good prospects for development in the plan period, and discussions continue with the agent about submitting an SoCG. To be cautious, the site has been included in the housing trajectory ([D3.2C](#)) towards the end of the plan period to start in 2029/30.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

183. The policy requirements for site GNLP0264 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP0264 a policy requirement was added relating to a WFD compliance assessment in relation to representations received from the Environment Agency at Regulation 18C (see page 124 of appendix 9f of the Statement of Consultation ([8.16](#))).

Site: Land east of Aylsham Road, Buxton with Lammas (Ref GNLP0297) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

184. The allocation of site GNLP0297 (see [A2](#), pages 382 and 383 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site in the Buxton with Lammas cluster, see the site assessment booklet [B1.29](#).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

185. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Buxton site assessment booklet ([B1.29](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district

council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0297 the main constraint was identified as the need to provide a short section of footway at the north east side of Aylsham Road to ensure a continuous safe pedestrian route to school and this is proposed to be mitigated through a requirement in the policy (see [A2](#), pages 382 and 383).

186. The site was also subject to Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F489 to 492 and G12). Issues flagged up in relation to the site were related to views from the nearby PRoW and noise pollution from the nearby railway line, but it is considered that these can be addressed through policy.
187. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP0297 an additional policy requirement was added to reflect that the development will need phasing in line with upgrades to the Aylsham Water Recycling Centre in response to representations from the Environment Agency at Regulation 18C (see page 14 appendix 9f of Consultation Statement ([A8.16](#))).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

188. The availability of site GNLP0297 is confirmed through a Statement of Common Ground agreed with the promoter ([D2.117](#)).
189. The viability of site GNLP0297 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
190. The deliverability of site GNLP0297 is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 35
 - Statement of Common Ground ([D2.117](#))
 - Site Delivery Table ([D1.5](#))
191. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2

of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

192. As stated on page 35 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0297 has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
193. The landowners, who are the executors of the JM Crane Will Trust, have provided an SoCG ([D2.117](#)) indicating their willingness to bring forward the development. They will consider submitting a planning application as the local plan's policies gain weight with a view to delivering 20 homes in 2023/24 and 20 homes in 2024/25. This is considered realistic but as the site does not meet the NPPF definition of deliverable it is thus deemed as developable and adjusted accordingly in the housing trajectory ([D3.2C](#)), with delivery of 20 homes in 2026/27 and 20 homes in 2027/28 projected.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

194. The policy requirements for site GNLP0297 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP0297 an additional policy requirement was added to reflect that the development will need phasing in line with upgrades to the Aylsham Water Recycling Centre in response to representations from the Environment Agency at Regulation 18C (see page 14 appendix 9f of Consultation Statement ([A8.16](#))). At Regulation 19 the site promoter suggested a change to policy requirement number 6 following clarification of evidence in relation to the Water Cycle Study, as stated at page 97 of appendix 11b to the Statement of Consultation ([A8.20](#)) the GNLP authorities have no objection in principle to this

Site: Land east of Gayford Road, Cawston (Ref GNLP0293) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

195. The allocation of site GNLP0293 (see [A2](#), pages 390 and 391 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site in the Cawston cluster, see the site assessment booklet [B1.31](#).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

196. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Cawston site assessment booklet ([B1.31](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0293 limited constraints were identified and only part of a much larger site was preferred for allocation. The site should be masterplanned with the adjacent carried forward CAW2 allocation to bring forward a cohesive development and this is reflected through a requirement in the policy (see [A2](#), pages 390 and 391).

197. The site was also subject to Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F500 to 503 and G23). The reduced size of the eventual allocation on GNLP0293 from that originally submitted addresses some of the identified potential impacts on Marriotts Way County Wildlife Site and the setting of the Conservation Area.

198. Consultation comments were also taken into account where appropriate (see Statement of Consultation [A8.1](#) and associated appendices).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

199. The availability of site GNLP0293 is confirmed through a Statement of Common Ground agreed with the promoter ([D2.118](#)).
200. The viability of site GNLP0293 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
201. The deliverability of site GNLP0293 is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 35
 - Statement of Common Ground ([D2.118](#))
 - Site Delivery Table ([D1.5](#))
202. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

203. As stated on page 35 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0293 has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
204. The landowners, the Pye Family, have provided an SoCG ([D2.118](#)) indicating their willingness to bring forward the development. The landowners are looking to agree an option agreement with a developer. An indicative timeframe is to complete the development by early 2024. These timescales will be kept under review. This is considered realistic but as the site does not meet the NPPF definition of deliverable it is thus deemed as developable and adjusted accordingly in the housing trajectory ([D3.2C](#)), with delivery of 20 homes in 2026/27 and 20 homes in 2027/28 projected.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

205. The policy requirements for site GNLP0293 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices

Site: South of Bowlers Close, Freethorpe (Ref GNLP2034) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

206. The allocation of site GNLP2034 (see [A2](#), pages 412 and 413 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site in the Freethorpe cluster, see the site assessment booklet [B1.34](#).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

207. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Freethorpe site assessment booklet ([B1.34](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP2034 minimal constraints

were identified, although the promoter will need to demonstrate that they can provide and footway and carriageway of adequate width to enable safe access and this has been written into the supporting text for the policy (see [A2](#), pages 412 and 413).

208. The site has also been subject to Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F528 to 531 and G13). One of the minor impacts identified by the SA included landscape impact, which is addressed through the site policy related to trees on the sites boundary.
209. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP2034 an additional policy requirement was added to refer to the need to upgrade Freethorpe Water Recycling Centre before development can take place in response to representations from the Environment Agency at Regulation 18C (see page 62 of appendix 9f of Statement of Consultation ([A8.16](#))).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

210. The availability of site GNLP2034 is confirmed through a Statement of Common Ground agreed with the promoter ([D2.125](#)).
211. The viability of site GNLP2034 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
212. The deliverability of site GNLP2034 is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 37
 - Statement of Common Ground ([D2.125](#))
 - Site Delivery Table ([D1.5](#))
213. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

214. As stated on page 37 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP2034 has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
215. One Planning Ltd on behalf of the landowner Mr Dunthorne have provided an SoCG ([D2.125](#)) indicating their intent to bring forward the development at 10 completions per annum and for it to be complete within five years. This cautious approach to the pace of development is reflected in the housing trajectory ([D3.2C](#)), which projects development to start in 2029/30.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

216. The policy requirements for site GNLP2034 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP2034 an additional policy requirement was added to refer to the need to upgrade Freethorpe Water Recycling Centre before development can take place in response to representations from the Environment Agency at Regulation 18C (see page 62 of appendix 9f of Statement of Consultation ([A8.16](#))).

Site: Land south of Le Neve Road, Marsham (Ref GNLP2143) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

217. The allocation of site GNLP2143 (see [A2](#), pages 452 and 453 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site in the Marsham cluster, see the site assessment booklet [B1.43](#).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

218. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Marsham site assessment booklet ([B1.43](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP2143 the main constraint was identified as heritage impact, which is proposed to be mitigated through requirements in the policy (see [A2](#), pages 452 and 453).

219. The site has also been subject to Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F565 to 568 and G14). The site scored negatively for the historic environment due to the proximity of the grade I listed church but it is felt that appropriate mitigation has been written into the policy.

220. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP2143 a Heritage Statement (B10.12) has been produced in response to concerns raised by Historic England as well as an additional policy requirement to conserve and enhance the listed buildings in the vicinity of the site. An additional policy requirement was also added in relation to upgrades to Aylsham Water Recycling Centre in response to

representations from the Environment Agency at Regulation 18C (see page 243 onwards of appendix 9f of Statement of Consultation ([A8.16](#))).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

221. The availability of site GNLP2143 is confirmed through a Statement of Common Ground agreed with the promoter ([D2.135](#)).
222. The viability of site GNLP2143 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
223. The deliverability of site GNLP2143 is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 40
 - Statement of Common Ground ([D2.135](#))
 - Site Delivery Table ([D1.5](#))
224. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

225. As stated on page 40 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP2143 has been promoted, is assessed as suitable and has been shown by appraisal to be viable.
226. The landowners Mr Payne and his family have provided an SoCG ([D2.135](#)) giving confidence that the site is developable within the plan period. To be cautious, the housing trajectory ([D3.2C](#)) places delivery of the site towards the back end of the plan period to start in 2029/30.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

227. The policy requirements for site GNLP2143 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP2143 a Heritage Statement ([B10.12](#)) has been produced in response to concerns raised by Historic England as well as an additional policy requirement to conserve and enhance the listed buildings in the vicinity of the site. An additional policy requirement was also added in relation to upgrades to Aylsham Water Recycling Centre in response to representations from the Environment Agency at Regulation 18C (see page 243 onwards of appendix 9f of Statement of Consultation ([A8.16](#))).

Site: West of Blofield Road, Lingwood (Ref GNLP0380) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

228. The allocation of site GNLP0380 (see [A2](#), pages 446 and 447 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as one of two suitable and deliverable sites in the Lingwood cluster, see the site assessment booklet [B1.42](#). The site was originally consulted on as a reasonable alternative at Regulation 18C and was preferred for allocation at Regulation 19 following consideration of consultation comments received to the original preferred site GNLP0379 (see appendix 9f of Statement of Consultation ([A8.16](#))). Appendix 1 of the site assessment booklet gives more detail about the choice of allocated sites in Lingwood.

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

229. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Lingwood site assessment booklet ([B1.42](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0380 the main constraints were identified as highway visibility and safety and the need to provide a gateway to the village, which are both proposed to be mitigated through requirements in the policy (see [A2](#), pages 446 and 447).

230. The site has also been subject to Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F557 to 560 and G14).

231. Consultation comments were also taken into account where appropriate (see Statement of Consultation [A8.1](#) and associated appendices

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

232. The availability of site GNLP0380 is confirmed through a Statement of Common Ground agreed with the promoter ([D2.133](#)).

233. The viability of site GNLP0380 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).

234. The deliverability of site GNLP0380 is demonstrated in a number of different documents:

- Housing Trajectory ([D3.2C](#))
- Appendix 4 to Topic Paper 1 ([D3.2](#)) page 39
- Statement of Common Ground ([D2.133](#))
- Site Delivery Table ([D1.5](#))

235. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021

which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

236. As stated on page 39 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0380 has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
237. Norfolk County Council and Repton Property Developments Ltd provided an SoCG ([D2.133](#)) indicating their intent to bring forward the development. Their ambition at the time of writing was to achieve 30 completions in 2025. Taking a cautious approach, at least part of this site is shown in the housing trajectory ([D3.2C](#)) as being deliverable in the next 5 years, and the projection is for the first completions in 2025/26.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

238. The policy requirements for site GNLP0380 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices).

Site: East of Station Road, Lingwood (Ref GNLP4016) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

239. The allocation of site GNLP4016 (see [A2](#), pages 448 and 449 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as one of two suitable and deliverable sites in the Lingwood cluster, see the site assessment booklet [B1.42](#). The site was a fairly late submission to the process and was preferred as an allocation at Regulation 19 following consideration of consultation comments received to the original preferred site GNLP0379. Appendix 1 of the site assessment booklet gives more detail about the choice of allocated sites in Lingwood.

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

240. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Lingwood site assessment booklet ([B1.42](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, planning officers from Norwich City Council, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP4016 the main constraint is achieving a suitable visibility splay for access and the removal of existing hedgerow were identified as heritage impact and the need for potential highway improvements, which are proposed to be mitigated through requirements in the policy (see [A2](#), pages 448 and 449).

241. The site has also been subject to Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F561 to 564 and G14).

242. Consultation comments were also taken into account where appropriate (see Statement of Consultation [A8.1](#) and associated appendices

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

243. The availability of site GNLP4016 is confirmed through a Statement of Common Ground agreed with the promoter ([D2.134](#)).
244. The viability of site GNLP4016 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
245. The deliverability of site GNLP4016 is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 39
 - Statement of Common Ground ([D2.134](#))
 - Site Delivery Table ([D1.5](#))
246. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

247. As stated on page 39 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP4016 has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
248. Norfolk County Council/ Repton Property Developments Ltd have provided an SoCG ([D2.134](#)) indicating their intent to bring forward the development to achieve 30 completions by 2024. Taking a cautious approach, at least part of this site is shown in the housing trajectory ([D3.2C](#)) as being deliverable in the next 5 years, and the projection is for the first completions in 2025/26.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

249. The policy requirements for site GNLP4016 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices

Site: Land to east of Station Road, Reedham (Ref GNLP1001) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

250. The allocation of site GNLP1001 (see [A2](#), pages 456 and 457 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as one of two suitable and deliverable sites in the Reedham cluster, see the site assessment booklet [B1.44](#).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

251. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Reedham site assessment booklet ([B1.44](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP1001 the main constraint is the inability to provide an off-carriageway pedestrian footway for the whole route to

Reedham Primary School. This is proposed to be mitigated through requirements in the policy for enhancement of Public Right of Way links to provide a traffic free route for part of the journey to school (see [A2](#), pages 456 and 457).

252. The site has also been subject Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F569 to 572 and G14).
253. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP1001 an additional policy requirement was added to make reference to the need for sensitive design to mitigate the impact on the Broads in response to representations from the Broads Authority at Regulation 18C (see page 261 of appendix 9f of Statement of Consultation ([A8.16](#))).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

254. The availability of site GNLP1001 is confirmed through a Statement of Common Ground agreed with the promoter ([D2.136](#)).
255. The viability of site GNLP1001 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
256. The deliverability of site GNLP1001 is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 40
 - Statement of Common Ground ([D2.136](#))
 - Site Delivery Table ([D1.5](#))
257. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

258. As stated on page 40 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP1001 has been promoted, is assessed as suitable and has been shown by appraisal to be viable and is subject to an option agreement with developer Badger Building (East Anglia). Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.

259. Badger Building has signed an SoCG ([D2.136](#)) indicating their intent to bring forward the development and at the time of writing aimed to make a planning application in 2021. This may slip into 2022, but the first phase of the development that fronts Station Road is well-advanced, and Badger Building have actively pursued the preparation of draft plans for the development of GNLP1001. In the housing trajectory ([D3.2C](#)) first delivery is shown in 2021/22. This may slip into 2022/23 but considering the good progress onsite with the first phase the site is considered 'deliverable' under the NPPF definition.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

260. The policy requirements for site GNLP1001 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP1001 an additional policy requirement was added to make reference to the need for sensitive design to mitigate the impact on the Broads in response to representations from the Broads Authority at Regulation 18C (see page 261 of appendix 9f of Statement of Consultation ([A8.16](#))). At Regulation 19 the Broads Authority suggested a change to policy requirement number 4 to include impact on dark skies, as stated at page 115 of appendix 11b to the Statement of Consultation ([A8.20](#)) the GNLP authorities have no objection in principle to this

Site: Mill Road, Reedham (Ref GNLP3003) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

261. The allocation of site GNLP3003 (see [A2](#), pages 458 and 459 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as one of two suitable and deliverable sites in the Reedham cluster, see the site assessment booklet [B1.44](#).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

262. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Reedham site assessment booklet ([B1.44](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP3003 the main constraint is related to highways and the recognition that it is not possible to provide an off-carriageway pedestrian footway to the school. The site is however located in close proximity to the school and it is proposed to mitigate any constraints through requirements in the policy (see [A2](#), pages 458 and 459). However this is reliant on the site promoter demonstrating to the highway authority that they can come up with an acceptable solution to fulfil the requirements of the policy.

263. In their Statement of Common Ground ([D2.137](#)) the promoters state that they believe there are alternative options for access that do not meet the requirements of the policy. The county highway authority have had sight of these proposals and do not consider them to be acceptable. In their view the allocation is only deliverable if the requirements of the policy are met and they do not believe these to have been demonstrated at the current time – see appendix 1 of this document for a supplementary highways note.

264. The site has also been subject to Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F573 to 576 and G15).

265. Consultation comments were also taken into account where appropriate (see Statement of Consultation [A8.1](#) and associated appendices

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

266. The availability of site GNLP3003 is confirmed through a Statement of Common Ground agreed with the promoter ([D2.137](#)).

267. The viability of site GNLP3003 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).

268. The deliverability of site GNLP3003 is demonstrated in a number of different documents:

- Housing Trajectory ([D3.2C](#))
- Appendix 4 to Topic Paper 1 ([D3.2](#)) page 41
- Statement of Common Ground ([D2.137](#))
- Site Delivery Table ([D1.5](#))

269. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

270. As stated on page 41 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP3003 has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.

271. The landowner Mr Key has provided an SoCG ([D2.137](#)) indicating his intent to bring forward the development. The owner is actively progressing technical studies into how the land can be developed. While the SoCG gives confidence that the site is developable within the plan period, a cautious approach is taken in the housing trajectory ([D3.2C](#)), with delivery projected from 2026/27 to allow ample time to progress to a planning consent.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

272. The policy requirements for site GNLP3003 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices).

273. In the case of site GNLP3003 the policy includes specific access requirements regarding vehicular access via Mill Road with pedestrian access at Holly Farm Road and the potential need to acquire third party land to achieve appropriate visibility splays. In their Statement of Common Ground ([D2.137](#)) the promoters state that they believe there are alternative options for access that do not meet the requirements of the policy. The county highway authority have had sight of these proposals and do not consider them to be acceptable. In their view the allocation is only deliverable if the requirements of the policy are met and they do not believe these to have been demonstrated at the current time – see appendix 1 of this document for a supplementary highways note.

Site: Land north of Chamery Lane, South Walsham (Ref GNLP0382) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

274. The allocation of site GNLP0382 (see [A2](#), pages 466 and 467 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site in the South Walsham cluster, see the site assessment booklet [B1.46](#).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

275. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the South Walsham site assessment booklet ([B1.46](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0382 the main constraint was identified as the need for highway improvements to ensure a safe and continuous pedestrian route to Fairhaven Primary School and this is proposed to be mitigated through a requirement in the policy (see [A2](#), pages 466 and 467).

276. The site has also been subject to Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F581 to 584 and G15).

277. Consultation comments were also taken into account where appropriate (see Statement of Consultation [A8.1](#) and associated appendices).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

278. The availability of site GNLP0382 is confirmed through a Statement of Common Ground agreed with the promoter ([D2.139](#)).
279. The viability of site GNLP0382 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
280. The deliverability of site GNLP0382 is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 42
 - Statement of Common Ground ([D2.139](#))
 - Site Delivery Table ([D1.5](#))
281. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

282. As stated on page 42 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0382 has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
283. Norfolk County Council has provided an SoCG ([D2.139](#)) indicating their intent to bring forward the development. Their intention is to submit a planning application in 2022 using the council's own development company, Repton Property Developments Ltd. This could lead to a start on site in 2023/24 and completion of all 25 homes in 2025/26, based on a build out rate of 20 homes per annum. The SoCG gives confidence that the site is developable within the plan period. However a cautious

approach is being taken in the housing trajectory ([D3.2C](#)) with delivery projected from 2026/27 due to the delay that has occurred to the neighbouring allocation SWA1. As allocating GNLP0382 facilitates access to SWA1, which is also owned by Norfolk County Council, there is a good prospect of these timescales being achieved.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

284. The policy requirements for site GNLP0382 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices). At Regulation 19 the site promoter suggested a change to the policy to give more flexibility regarding access, as stated at page 117 of appendix 11b to the Statement of Consultation ([A8.20](#)) the GNLP authorities have no objection in principle to this

Site: Land east of Woodbastwick Road, Blofield Heath (Ref GNLP1048R) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

285. The allocation of site GNLP1048R (see [A2](#), pages 376 and 377 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site in the Blofield Heath cluster, see the site assessment booklet [B1.28](#). The site area was reduced from 0.95ha to 0.64ha following comments received from the site promoter at Regulation 18C (see pages 6 and 7 of appendix 9f to Consultation Statement ([A8.16](#)))

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

286. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Blofield Heath site assessment booklet ([B1.28](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP1048R the main constraints identified were related to highway improvements, which are proposed to be mitigated through requirements in the policy (see [A2](#), pages 376 and 377).

287. The site was also subject to Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F481 to 484 and G22). The SA flagged up issues related to biodiversity and landscape which are both addressed through the policy.

288. Consultation comments were also taken into account where appropriate (see Statement of Consultation [A8.1](#) and associated appendices

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

289. The availability of site GNLP1048R is confirmed through a Statement of Common Ground agreed with the promoter ([D2.114](#)).

290. The viability of site GNLP1048R has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).

291. The deliverability of site GNLP1048R is demonstrated in a number of different documents:

- Housing Trajectory ([D3.2C](#))
- Appendix 4 to Topic Paper 1 ([D3.2](#)) page 34
- Statement of Common Ground ([D2.114](#))
- Site Delivery Table ([D1.5](#))

292. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year

Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

293. As stated on page 34 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP1048R has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
294. Savills, on behalf of the landowner Hugh Crane Ltd, have submitted a SoCG ([D2.114](#)) indicating their willingness to achieve 30 completions in 2024/25 and a further completions in 2025/26. This time scale is considered realistic and is reflected cautiously in the housing trajectory ([D3.2C](#)), with delivery of 20 homes in 2026/27. Please note the allocation has been revised down to approximately 20 homes not the 60 specified in the SoCG and this will be a matter for further negotiation. Nevertheless, the landowners commitment to bringing forward development on GNLP1048R has been demonstrated.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

295. The policy requirements for site GNLP1048R are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices). At Regulation 19 the site promoter suggested a change to policy requirement number 4 to remove specific reference to grass snakes and replace with the more general requirement for an ecological appraisal, as stated at page 96 of appendix 11b to the Statement of Consultation ([A8.20](#)) the GNLP authorities have no objection in principle to this

Site: Land at Rectory Road and south of the Bure Valley Railway, Coltishall (Ref GNLP2019) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

296. The allocation of site GNLP2019 (see [A2](#), pages 398 and 399 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site in the Coltishall cluster, see the site assessment booklet [B1.32](#).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

297. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Coltishall site assessment booklet ([B1.32](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP2019 the main constraint was identified as the local highway network, which is both proposed to be mitigated through requirements in the policy for a transport assessment (see [A2](#), pages 398 and 399).

298. The site has been subject to Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F512 to 515 and G13). The SA did flag up the proximity of the site to the Bure Valley railway and text has been added to both the policy and the supporting text to reflect and mitigate for this.

299. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP2019 additional words were added to the supporting text to reflect the importance of the Bure Valley Railway and Bure Valley path in response to representations from the District

Councillor at Regulation 18C (see page 42 of appendix 9f to the Statement of Consultation ([A8.16](#))).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

300. The availability of site GNLP2019 is confirmed through a Statement of Common Ground agreed with the promoter ([D2.121](#)).
301. The viability of site GNLP2019 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
302. The deliverability of site GNLP2019 is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 36
 - Statement of Common Ground ([D2.121](#))
 - Site Delivery Table ([D1.5](#))
303. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

304. As stated on page 36 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP2019 has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
305. The developer Crocus Contractors Ltd has signed an SoCG ([D2.121](#)) indicating their intention to bring forward the development. The exact start on site date is difficult to predict due to GNLP2019 being accessed via the existing allocation COL1.

However, both sites are in the control of Crocus Contractors Ltd and COL1 has recently had a planning application (20201627) approved by Broadland District Council which overlaps with site GNLP2019. Crocus Contractor also estimate in their SoCG that both Col1 and GNLP2019 can be delivered within five years. Accordingly GNLP2019 is identified in the housing trajectory ([D3.2C](#)), as being deliverable and projected for completion in 2025/26.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

306. The policy requirements for site GNLP2019 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices).). In the case of site GNLP2019 additional words were added to the supporting text to reflect the importance of the Bure Valley Railway and Bure Valley path in response to representations from the District Councillor at Regulation 18C (see page 42 of appendix 9f to the Statement of Consultation ([A8.16](#))).

**Site: Land at Bridge Farm Field, St Faiths Close, Great Witchingham (Ref GNLP0608R) Are the proposed site allocations listed below soundly based?
In particular:**

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

307. The allocation of site GNLP0608R (see [A2](#), pages 422 and 423 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site in the Lenwade/Great Witchingham cluster, see the site assessment booklet [B1.41](#). The area of the allocation was reduced from 1.75 ha to 0.72ha following representations from the site promoter at Regulation 18C (see page 101 of appendix 9f of Statement of Consultation ([D8.16](#))).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

308. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Great Witchingham site assessment booklet ([B1.41.](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0608R the main constraint is the potential for a ransom strip between the offered land and the highway, the site promoter will have to demonstrate that vehicular access is achievable which has been mentioned in the supporting text to the policy (see [A2](#), pages 422 and 423).
309. The site has also been subject to Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F532 to 535 and G13).
310. Consultation comments were also taken into account (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP0608R this included the addition of a policy requirement to conserve and enhance the significance of the grade II listed Bridge House to the east of the site in response to representations from Historic England (see page 102 of appendix 9f of Statement of Consultation ([D8.16](#))).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

311. No Statement of Common Ground has been submitted to demonstrate the availability of the site, but the site has been promoted through the local plan process and there is no evidence to show that it is not available.
312. The viability of site GNLP0608R has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
313. The deliverability of site GNLP0608R is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 37

- Site Delivery Table ([D1.5](#))

314. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

315. As stated on page 37 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0608R has been promoted, is assessed as suitable and has been shown by appraisal to be viable.
316. The site is promoted by the landowners who are the Comer/Moy family and has good prospects for development in the plan period. Since no SoCG has been submitted, to be cautious, the site has been placed in the housing trajectory ([D3.2C](#)) towards the back end of the plan period to start in 2029/30.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

317. The policy requirements for site GNLP0608R are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP0608R this included the addition of a policy requirement to conserve and enhance the significance of the grade II listed Bridge House to the east of the site in response to representations from Historic England (see page 102 of appendix 9f of Statement of Consultation ([D8.16](#))). At Regulation 19 Norfolk Wildlife Trust suggested a change to insert a new policy requirement for preliminary ecological assessment, as stated at page 106 of appendix 11b to the Statement of Consultation ([A8.20](#)) the GNLP authorities have no objection in principle to this.

Site: Land west of Foundry Close, Foulsham (Ref GNLP0605) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

318. The allocation of site GNLP0605 (see [A2](#), pages 406 and 407 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site in the Foulsham cluster, see the site assessment booklet [B1.33](#).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

319. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the Foulsham site assessment booklet ([B1.33](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. Site GNLP0605 has minimal constraints (see [A2](#), pages 434 and 435).

320. The site was also subject to Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F520 to 523 and G13). Issues identified were related to historic environment, landscape and biodiversity impacts but these are considered to be minor and it is considered that the heritage impacts can be addressed through the policy.

321. Consultation comments were also taken into account where appropriate (see Statement of Consultation [A8.1](#) and associated appendices. In the case of site GNLP0605R this included the addition of a policy requirement to conserve and enhance the significance of grade II listed buildings to the south of the site in response to representations from Historic England (see page 57 of appendix 9f of the Statement of Consultation ([A8.16](#))).

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

322. The availability of site GNLP0605 is confirmed through a Statement of Common Ground agreed with the promoter ([D2.123](#)).
323. The viability of site GNLP0605 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
324. The deliverability of site GNLP0605 is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 36
 - Statement of Common Ground ([D2.123](#))
 - Site Delivery Table ([D1.5](#))
325. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

326. As stated on page 36 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0605 has been promoted, is assessed as suitable and has been shown by appraisal to be viable. Evidence from Start to Finish indicates that such sites typically deliver their first homes 3 years from validation of a planning application.
327. DLP Planning on behalf of the landowner Mr Hendry have submitted an SoCG ([D2.123](#)) indicating their willingness to bring forward the development. They intend to submit a planning application once the site is allocated in the local plan. In the meantime, negotiations are taking place over a ransom strip, alongside work on technical investigations. To be cautious the site is projected in the housing trajectory ([D3.2C](#)) to be built out in 2026/27.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

328. The policy requirements for site GNLP0605 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices). In the case of site GNLP0605R this included the addition of a policy requirement to conserve and enhance the significance of grade II listed buildings to the south of the site in response to representations from Historic England (see page 57 of appendix 9f of the Statement of Consultation ([A8.16](#))).

Site: Land adjoining Norwich Road, Salhouse (Ref GNLP0188) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

329. The allocation of site GNLP0188 (see [A2](#), pages 462 and 463 for the policy) is justified as it is an appropriate housing development site taking account of reasonable alternatives as supported by evidence. Its inclusion as an allocation has taken account of sustainability appraisal (see [A6.3](#) for detailed assessments of the site), consultation comments (see Statement of Consultation [A8.1](#) and associated appendices) and the settlement hierarchy. It has been assessed as the most suitable and deliverable site in the Salhouse cluster, see the site assessment booklet [B1.45](#).

Question 2

Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

Response to question 2

330. The constraints to development and any implications for infrastructure have been identified and evaluated through the site assessment process as documented in the

Salhouse site assessment booklet ([B1.45](#)). This process was robust and involved a number of different partners including Norfolk County Council highways, district council development management colleagues, Children's Services, Minerals and Waste and the Lead Local Flood Authority. For site GNLP0188 the main constraints were identified as townscape impact and the need for potential highway improvements, which are both proposed to be mitigated through requirements in the policy (see [A2](#), pages 462 and 463).

331. The site has also been subject to Sustainability Appraisal (see [A6.3](#) for detailed assessments of the site, particularly F577 to 580 and G15).
332. Consultation comments were also taken into account where appropriate (see Statement of Consultation [A8.1](#) and associated appendices

Question 3

Has the availability, viability and deliverability of the site been robustly assessed??

Response to question 3

333. No Statement of Common Ground has been submitted to demonstrate the availability of the site, but the site has been promoted through the local plan process and there is no evidence to show that it is not available.
334. The viability of site GNLP0188 has been assessed through the use of typologies in the Viability Appraisal ([B26.3](#)).
335. The deliverability of site GNLP0188 is demonstrated in a number of different documents:
- Housing Trajectory ([D3.2C](#))
 - Appendix 4 to Topic Paper 1 ([D3.2](#)) page 41
 - Site Delivery Table ([D1.5](#))
336. As stated on page 27 of Appendix 4 to Topic Paper 1 ([D3.2](#)), the deliverability of sites has been considered with regard to evidence from the councils' 2019/20 5 Year Housing Land Supply Statement, an updated trajectory produced in November 2021 which took account of agreed evidence from a planning appeal ([D3.2C](#), see page 2 of [D3.2B](#) on the updates), Statements of Common Ground agreed with landowners and developers and other objective evidence including the Lichfields publication '[Start to Finish](#)'.

Question 4

Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)?

Response to question 4

337. As stated on page 41 of Appendix 4 to Topic Paper 1 ([D3.2](#)), site GNLP0188 has been promoted, is assessed as suitable and has been shown by appraisal to be viable.
338. The site still has good prospects for development in the plan period, but the agent and landowner has declined to submit an SoCG. To be cautious the site has been placed towards the back of the plan period to start in 2029/30 see housing trajectory ([D3.2C](#)).

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

339. The policy requirements for site GNLP0188 are justified and effective having been developed through the site assessment and sustainability appraisal process, in liaison with partners such as Norfolk County Council highways, the Lead Local Flood Authority, Minerals and Waste and District and City Council planning colleagues. The policy requirements have been amended where appropriate in response to consultation comments (see Statement of Consultation [A8.1](#) and associated appendices).

Appendix 1 Norfolk County Council Highway Authority note regarding Statement of Common Ground ([D2.137](#)) on site GNLP3003 – Land off Mill Road, Reedham

Thank you for forwarding the above SoCG. I have reviewed the document and whilst I note it has been signed off by Greater Norwich Development Partnership, would wish to highlight some matters in respect of Highway requirements.

By way of background, the Highway Authority has been consulted with two different proposals to provide access to GNLP3003. The provided drawings sought to demonstrate that vehicular access could be achieved via either Mill Road, or Holly Farm Lane. Neither proposal was considered acceptable on highway safety grounds.

I would comment on the proposals as follows:

Vehicular Access

Holly Farm Road is not considered suitable to provide access to the development. It is not sufficiently wide to support two-way traffic and would need to be widened. All development traffic would pass through the Holly Farm Road junction with School Hill and Mill Road. Visibility at the junction from Holly Farm Road would require improvement to be of an appropriate standard to safely accept development traffic. Reedham Primary School is accessed direct from the carriageway within the junction. The proposed layout presented significant highway layout concerns and would be resisted by the Highway Authority.

The improvements required to make access via Holly Farm Road acceptable are not achievable within highway, would require land from multiple owners and potentially significant engineering due to differences in ground levels. It is considered unlikely that a satisfactory provision is achievable.

Mill Road is considered able to support a vehicular access for development, subject to provision of visibility splays to current standards. The Highway Authority has been consulted with a proposal to narrow the carriageway to provide visibility splays within existing highway; the proposal was found to be unacceptable. The existing carriageway width must be maintained, it is clear that 3rd party land would be required at both sides of the access to enable an acceptable layout to be achieved.

Pedestrian Access

The development proposals include a pedestrian access at Holly Farm Road. The pedestrian route would join the road adjacent to a brick parapet for an existing rail bridge. The parapet is adjacent to the carriageway and would mask a small child. The carriageway at the bridge is not sufficiently wide to provide a footway. It is a concern that emerging pedestrians would not be visible to vehicles approaching from the southeast. Pedestrians would be required to walk in narrow carriageway, in conflict with vehicles. This proposal may result in a highway safety concern.

With regard to the SoCG, I would wish to highlight the following:

Section 1

It is stated that 3rd party land may be required for visibility splays at Mill Road. The Highway Authority considers that an acceptable highway access cannot be achieved at Mill Road without 3rd party land.

It is also stated that a pedestrian access will be provided at Holly Farm Road, this may result in a highway safety concern.

Section 2

It is stated that 3rd party land may be required for visibility splays at Mill Road. The Highway Authority considers that an acceptable highway access cannot be achieved at Mill Road without 3rd party land.

Pedestrian access at Holly Farm Road may result in a highway safety concern.

It has not been demonstrated that an acceptable access via Holly Farm Lane can be achieved. It is likely such a proposal would be resisted by the Highway Authority.

Section 5

It has not been demonstrated that an acceptable access via Holly Farm Lane can be achieved. It is likely such a proposal would be resisted by the Highway Authority.

Section 6

The Highway Authority considers that acceptable highway access at Mill Road will require 3rd party land.

A pedestrian access at Holly Farm Road may result in a highway safety concern.

It has not been demonstrated that an acceptable access via Holly Farm Lane can be achieved. It is likely such a proposal would be resisted by the Highway Authority.

Section 7

It has not been demonstrated that an acceptable access via Holly Farm Lane can be achieved. It is likely such a proposal would be resisted by the Highway Authority.

David Wilson
Engineer Major and Estate Development