

**SOUTH NORFOLK VILLAGES (NON RESIDENTIAL SITES) – SITE SUMMARIES**

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	SOUTH NORFOLK VILLAGES (NON-RESIDENTIAL SITES) OVERVIEW
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	22
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	12 Support, 3 Object, 7 Comment

South Norfolk Village (Non- Residential Sites) have 1 c/f allocation, 0 preferred sites, 0 reasonable alternatives and 11 sites which are judged to be unreasonable.

Main issues:

- Soundness issues raised in relation to site GNLP0604R at Swainsthorpe. Request for site to be allocated for the relocation of Ben Burgess
- Significant public opposition to site GNLP0604R
- Discrepancies identified between the HELAA and the site assessment booklet for site GNLP2128 at Tivetshall. Concern about absence of brownfield assessment from HELAA methodology. Criticism that no high level viability work has been undertaken for non-residential sites. Request to reconsider site for allocation

Sites with no comments submitted through the consultation:

#### Unreasonable Non-Residential Sites

- GNLP0224 – Bunwell
- GNLP0455 – Gillingham, including Haddiscoe
- GNLP0245 – Mulbarton Cluster (Ketteringham)

- GNLP2165 – Mulbarton Cluster (East Carleton)
- GNLP0071R – Seething Cluster (Mundham)
- GNLP2158 – Stoke Holy Cross Cluster (Caistor St Edmund and Bixley)
- GNLP0545 – Tacolneston
- GNLP0546 – Tacolneston
- GNLP2182 – Wreningham Cluster (Ashwellthorpe)

### South Norfolk Villages Non-Residential Sites– General Comments

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	South Norfolk Villages Non-Residential Sites - General Comments
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 0 Object, 2 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>GNLP RESPONSE</b>	<b>CHANGE TO PLAN</b>
National Grid	Comment	Refers to GNLP0552 which isn't non-residential. Site is in close proximity to National Grid assets (Overhead Transmission Line Route).		Passed to South Norfolk Council for consideration through their Village Clusters Plan	None
Breckland District Council	Comment	Welcome further discussions regarding progress of sites at Foulsham, Easton and Honingham		Logged under policy 7.4, not non-residential so no further action needed here	None

### South Norfolk Villages Non Residential Sites – Carried Forward Allocations

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	BKE 3, Brooke Industrial Estate (Carried Forward allocation)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 2 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>GNLP RESPONSE</b>	<b>CHANGE TO PLAN</b>
Anglian Water	Comment	No reference to water efficiency forming part of design unlike other allocation policies. See also comments on Policy 2	<ul style="list-style-type: none"> <li>Consistent policy approach to water efficiency needed</li> </ul>	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	None
Norfolk Wildlife Trust	Comment	This allocation appears to overlap with Atlas Gravel Workings CWS and needs further clarification		The allocation does overlap with the County Wildlife site however the principle and boundary of the BKE3 allocation has already been	

				agreed through the South Norfolk Local Plan so it carried forward unchanged into the GNLP.	
Historic England	Object	<p>Comments:</p> <ul style="list-style-type: none"> <li>• Arlington Hall grade II listed lies to east of site.</li> <li>• Welcome reference to landscaping southern boundary</li> <li>• North east boundary treatment is considered important</li> </ul> <p>Recommend amending bullet point in policy to reference all boundary treatments and setting of listed buildings</p>		It is accepted that the policy should acknowledge the potential for harm to the heritage assets and the requirement for measures to address this.	<p>Amend existing policy requirement to include reference to the need for north east boundary treatment.</p> <p>Add policy requirement to BKE3 to read: ‘Any development must conserve and enhance the significance of the grade II listed Arlington Hall to the east of site, including any contribution made to that significance by setting.</p>

### South Norfolk Villages Non Residential Sites – Unreasonable Sites

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	GNLP 0604R, Land West of A140, Adjacent Hickling Lane, Swainsthorpe (Newton Flotman Cluster) (Unreasonable Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	16
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	12 Support, 1 Object, 3 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>GNLP RESPONSE</b>	<b>CHANGE TO PLAN</b>
Ben Burgess Ltd via CODE Development Planners Ltd	Object	<p>Ben Burgess contends that as currently drafted the GNLP would fail when considered against the legal requirements and tests of soundness in accordance with paragraph 35 of the NPPF.</p> <p>Previous representations have demonstrated that the proposal for a new headquarters at Swainsthorpe is deliverable and would constitute sustainable economic development. The GNLP does not explain how the locational requirements of the sector within which Ben Burgess operates have</p>	<p>Consideration of soundness issues raised.</p> <p>Request for engagement with GNLP Team prior to Regulation 19 to discuss reasonable alternatives</p>	<p>Issues raised added to Soundness Log.</p> <p>The view remains that the site is better dealt with through the planning application process as there is no identified need to allocate any additional large scale employment sites in the Greater Norwich Local Plan. Evidence shows</p>	

		<p>been addressed in accordance with paragraph 82 of the NPPF. Ben Burgess would like to engage with GNLP team ahead of Regulation 19 to identify reasonable alternatives.</p> <p>The evidence base fails to consider the specific requirements of the industry in order to justify the claim “evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich”. The decision to designate to the Development Management Process contradicts the very foundation of a policy led planning system.</p> <p>Ben Burgess contend that land west of Ipswich Road, Swainsthorpe should be considered as a preferred option in the GNLP and failure to do so would render the plan unsound.</p> <p>(More detail contained in representation)</p>		that currently committed land is more than sufficient in quantity and quality to meet the employment needs in Greater Norwich.	
Members of the Public - various	Comment/Support	<p>Comments in support of site being considered unreasonable include:</p> <ul style="list-style-type: none"> <li>• Unjustified to destroy arable fields, landscape, habitats and wildlife</li> <li>• Would destroy views of Grade II listed church and wider countryside for villagers</li> </ul>		Support noted	None

		<ul style="list-style-type: none"> <li>• Would contradict South Norfolk Local Landscape Designations Review – Landscape Character Areas and River Valleys in the Norwich Policy Area (2012)</li> <li>• Would re-define Swainsthorpe as an adjunct to an industrial complex</li> <li>• Will devastate a beautiful Saxon village</li> <li>• Will add to congestion on A140 at peak times/terrible transport links.</li> <li>• A140 traffic already due to increase due to Long Stratton housing developments.</li> <li>• A140 has large number of accidents, turning onto A140 currently dangerous.</li> <li>• Important road for emergency services which would be affected.</li> <li>• Noise pollution would increase for nearby village.</li> <li>• Already separate Planning permissions for site (reference 2018/2631 and 2018/2632)</li> <li>• Greenfield sites shouldn't be used when brownfield sites are available for development.</li> <li>• Proposal contradicts 2.19 which says smaller villages will have appropriately smaller developments.</li> </ul>			
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		<ul style="list-style-type: none"> <li>• Surface water concerns during winter/wet weather</li> <li>• No/limited pedestrian access, potentially dangerous walking/cycling routes to site.</li> <li>• Would contradict environmental protection policies.</li> </ul>			
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<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	GNLP 2128, Former Waste Transfer Station, Tivetshall (Tivetshall St Mary and St Margaret Cluster) (Unreasonable Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	1
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 object, 0 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>GNLP RESPONSE</b>	<b>CHANGE TO PLAN</b>
FCC Environment Ltd via Agent	Object	Identified discrepancies between the site assessment booklet and the 2018 HELAA addendum. The site was initially scored as 'green' for all constraints except for contamination in the 2018 HELAA. However, the HELAA comparison table in the site assessment booklet scores amber on a number of factors.	Further investigation into discrepancies between the site assessment booklet and 2018 HELAA addendum	Issue regarding absence of brownfield assessment in the HELAA added to log of soundness issues. The HELAA is based on a	

		<p>FCC has reviewed the RAG assessment and considers that the amber scores for access to site, significant landscapes, historic environment and transport and roads should be green</p> <p>Not clear from Para 5.10 of HELAA 2017 whether overly cautious technical consultees have affected final RAG assessment or if these have been adjusted. This should be more transparent and adjusted appropriately where needed.</p> <p>Stage 4 of Assessment booklet concludes site not suitable as more evidence needed to prove demand (Presumed to be based off Parish Council comments). High level viability work only appears to have been done for residential developments which raises questions as to the evidence to support this reason to discount the site.</p> <p>FCC maintain the redevelopment of the site is viable/achievable with sufficient market demand particularly as there is a significant amount of growth permitted in Long Stratton to the north. A viability assessment has been undertaken by specialist consultants which concluded there is demand for a variety of commercial uses.</p>	<p>Further consideration of implications of lack of brownfield/greenfield assessment in the HELAA</p>	<p>Norfolk wide methodology</p> <p>Discrepancies between the HELAA addendum and site assessment booklets are noted and will be investigated through further site assessment work. However the view remains that the site is better dealt with through the planning application process as there is no identified need to allocate any additional large scale employment sites in the Greater Norwich Local Plan. Evidence shows that currently committed land is more than sufficient in quantity and quality to meet the employment needs in Greater Norwich.</p>	
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		<p>Question the level of consideration that has been given to the brownfield status of the site. Given that there is no specific criteria relating to brownfield land within the HELAA assessment, it is unclear how the council can demonstrate that they have considered the use of previously developed land above greenfield development sites. Therefore, the soundness of the evidence base documents, and thus, the Local Plan is questioned.</p> <p>FCC consider that the site is suitable, available and achievable for redevelopment, and would provide an opportunity to redevelop a redundant brownfield site, which national planning policy requires local plans to strive to achieve. Thus, the site should be allocated for development within the Local Plan.</p>			
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